LAW OFFICES

MESSER, VICKERS, CAPARELLO, MADSEN, LEWIS, GOLDMAN & METZ

SUITE 701

215 SOUTH MONROE STREET POST OFFICE BOX 1876

TALLAHASSEE, FLORIDA 32302-1876

TELEPHONE (904) 222-0720 TELECOPIER (904) 224-4359 SUITE 900
2000 PALM BEACH LAKES BOULEVARD
WEST PALM BEACH, FLORIDA 33409
TELEPHONE (407) 640-0820

TELECOPIER (407) 640-8202

Tallahassee

August 11, 1993

HAND DELIVERY

Mr. Steve Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32399-0850

Re: FPSC Docket No. 911082-WS

Dear Mr. Tribble:

Enclosed for filing on behalf of Southern States Utilities, Inc. in the above-referenced docket are sixteen (16) copies of a two page exhibit reflecting Southern States' average investment in excess of rate base to be included in the record of this proceeding.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours

Floyd R. Sel

FRS/amb Enclosures

cc: with enclosures

Christiana T. Moore, Associate General Counsel

Wayne L. Schiefelbein, Esq.

H. F. Mann, II, Assocate Public Counsel

Brian P. Armstrong, Esq.

Mr. Buddy Dewar

Hon. Julia L. Johnson, Commissioner

DOCUMENT NUMBER-DATE

08696 AUG II &

FPSC OREAU OF RECORDS

FPSC-RECORDS/REPURTING

W/D OTn

FM

PAGE 1

SOUTHERN STATES UTILITIES SUMMARY OF ESTIMATED SSU AVERAGE INVESTMENT IN EXCESS OF RATE BASE FOR 1993 RULE (000's)

SSU INVESTMENT @ 12/31/91

\$118,496

RATE BASE PER FILING @ 12/31/91

97,165

TOTAL INVESTMENT IN EXCESS OF RATE BASE

\$21,331

PAGE 2

SOUTHERN STATES UTILITIES SUMMARY OF ESTIMATED SSU AVERAGE INVESTMENT IN EXCESS OF RATE BASE BY MAJOR SYSTEMS FOR 1993 RULE MAKING WORKSHOP

SYSTEM NAME	\$8U INVESTMENT @12/31/91 (a)	RATE BASE PER FILINGS @ 12/31/91 (b)	INVESTMENT IN EXCESS OF RATE BASE (a-b)
DELTONA SYSTEMS	79,101	67,172	11,929
LEHIGH UTILITIES	11,873	9,314	2,559
BURNT STORE	3,046	1,086	1,960
DEEP CREEK	1,964	1,027	937
SUGAR MILL WOODS	2,394	0	2,394
OTHER SYSTEMS OVER \$100,000	*Id		
BEACON HILLS	1,737	1,070	667
CHULUOTA	2,022	1,613	409
COVERED BRIDGE	171	66	105
FL CENT COMM PARK	485	0	485
HERMITS COVE	239	119	120
HOLIDAY HAVEN	181	41	140
KEYSTONE HEIGHTS	835	608	227
PALM TERRACE	570	436	134
SILVER LAKE EST	237	118	119
SUGAR MILL	936	215	721
SUNSHINE PARKWAY	1,372	470	902
UNIVERSITY SHORES	3,703	3,136	567
ZEPHYR SHORES	253	142	111
TOTAL SYSTEMS OVER \$100,000	12,741	8,034	4,707
REMAINING SYSTEMS	11,000	10,532	488
LESS LP GAS	3,623	0	3,623
	118,496	97,165	21,331

NOTES:

SSU's investment is a combination of consideration paid plus liabilities assumed at time of acquisition plus additions since acquisition. It does not include the assumption of off balance sheet liabilities or the out of pocket cost of acquisitions.

This presentation does not include the following systems as they are (or were) county regulated as of 12/31/91: Lake Gibson, Sugar Creek, Orange Hill, Gibsonia Estates (Polk County); Keystone Club, Geneva Lakes (Bradford County); Venice Gardens (Sarasota County); Valrico Hills, Hershel Heights (Hillsborough County); Tropical Isle (St. Lucie County); and Palm Valley, Remington Forest (St. John's County). It also does not include Enterprise, a Volusia County receivorship. It does include two non-FPSC-regulated systems (Seaboard and Deep Creek) and one sold system (St. Augustine) as they were part of a larger purchase which included both FPSC Regulated and Non-FPSC regulated systems.