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November 15, 1995

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Case No. 950495-WS

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Motion for Reconsideration.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck

Charles J. Beck
Deputy Public Counsel

- ACK ✓
- AFA 3
- APP CJB:bsr
- CAF Enclosures
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- LEG 1
- LM 5
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
11329 NOV 15 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate)
increase for Orange-Osceola)
Utilities, Inc. in Osceola County,)
and in Bradford, Brevard, Charlotte,)
Citrus, Clay, Collier, Duval,)
Highlands, Lake, Lee, Marion,)
Martin, Nassau, Orange, Osceola,)
Pasco, Putnam, Seminole, St. Johns,)
St. Lucie, Volusia, and Washington)
Counties by Southern States)
Utilities, Inc.)
_____)

Docket No. 950495-WS

Filed: November 15, 1995

MOTION FOR RECONSIDERATION

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the full Commission to reconsider order no. PSC-95-1387-PCO-WS issued by the prehearing officer on November 8, 1995.

1. On September 18, 1995, the Citizens filed a motion concerning the procurement of funds to represent two groups of customers. The statewide rates sought by SSU in this case allegedly cause a flow of value between customer groups: from customers for which the state wide rates cause recovery of more than SSU's stand alone costs to customers for whom the state wide rates cause recovery of less than SSU's stand alone costs. The motion stated that the two generally defined customer groups' interests are adverse, each to the other, and that the Public

Counsel's representation of either one or the other is inimical to the interests of both.

2. Since these conflicting interests arise from SSU's request for uniform rates, the motion asked the Commission to compel SSU to provide a reasonable funds for the purpose of securing competent representation of two groups of customers.

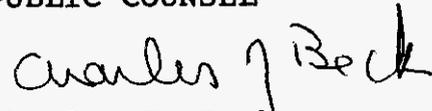
3. On November 8, 1995, the prehearing officer denied the motion.

4. The Citizens' motion raises an issue never before considered by the Commission. The Commission's ruling on the motion may well determine whether all or only some customers' interests regarding uniform rates are represented before the Commission in this case. Due to the uniqueness and importance of this issue, the Citizens request the Commission to waive the standard for reconsideration typically applied by the Commission and consider de novo the matters raised in the Citizens motion.

WHEREFORE, the Citizens request the Commission to reconsider de novo order no. PSC-95-1387-PCO-WS issued by the prehearing officer on November 8, 1995.

Respectfully submitted,

JACK SHREVE
PUBLIC COUNSEL



Charles J. Beck
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Attorneys for the Citizens
of the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 950495-WS**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery* to the following party representatives on this 15th day of November, 1995.

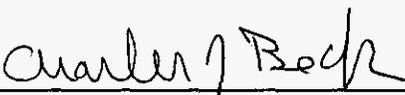
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