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May 21, 1992

Chairman Tom Beard
Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

ORIGINAL
FILE C

Dear Chairman Beard:

RE: Southern States, Inc. Docket No. 920199-WS

The Citizens have received MFR filings by Southern States Utilities, Inc.

The purpose of this letter is to advise that the Citizens note the absence of prefiled testimony which is required by Rule 25-30.430(3)(a), Florida Administrative Code, which provides:

ACK _____ Prepared testimony will be required, as part of the minimum
AFA _____ filing requirements, for all cases anticipated to require a
APP _____ formal hearing, rather than a proposed agency process.

CAF _____ While the test year approval request letter filed by the utility mentions a thirty day
CMU _____ delay in the filing of testimony, the letter is devoid of any justification for the waiver of
CTR _____ a commission rule directed to the point.

EAC _____
LEG _____ The Citizens believe the MFR's deficient because they do not contain prefiled
testimony which is plainly required by the Rules of the Commission.

LIN _____

OPC _____

RCH _____

SEC 1 _____

WAS _____

OTH _____

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Any ruling which would serve to waive the provisions of Rule 25-30.430(3)(a) substantially affects the interests of the Citizens, accordingly, the Citizens request a point of entry into any process which could result in such a waiver.

Sincerely,



Harold McLean
Associate Public Counsel

cc: All Parties of Record