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May 17, 1993

Mr. Steve Tribble
Director of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0870

RE: Docket No. 911082-WS
Proposed new, revised and repealed rules pertaining to water
and wastewater regulation.

Dear Mr. Tribble:

Enclosed for filing on behalf of Florida Cities Water Company
in the above docket are an original and 15 copies of the following:

- 5306-93** 1. Florida Cities Water Company's Response to Order
Establishing Procedures to be Followed at Rulemaking
Hearing; and
- 5307-93** 2. Florida Cities Water Company's Supplemental Comments
regarding the "Response to Opposition Comments of the
Florida Cities Water Company to the Rule Revision
Proposal of the Florida Fire Sprinkler Association".

Please acknowledge receipt of the foregoing by stamping the
enclosed extra copy of this letter and returning same to my
attention. Thank you for your assistance.

Sincerely,

Wayne L. Schiefelbein

Wayne L. Schiefelbein

ACK _____
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 CTR _____
 GMJ _____
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 LEV _____
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WLS/jhg

cc: All interested persons listed
on FPSC docket mailing list.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

RE: Proposed New and Amended)
Water and Wastewater Rules)

Docket No. 911082-WS
Filed: May 17, 1993

FLORIDA CITIES WATER COMPANY'S RESPONSE
TO ORDER ESTABLISHING PROCEDURES
TO BE FOLLOWED AT RULEMAKING HEARING

Florida Cities Water Company, by and through its undersigned counsel, files this response to Order No. PSC-93-0683-PCO-WS:

1. Florida Cities Water Company will file concurrently herewith Supplemental Comments in response to the last filing it has received from the Florida Fire Sprinkler Association. These are in addition to the Comments filed by Florida Cities Water Company on April 23, 1993 pursuant to the Commission's Notice of Rulemaking.

2. Florida Cities Water Company requests that Larry Coel and Mike Acosta be given an opportunity to address the Commission in support of its comments. We respectfully suggest the 20 minutes allotted by Order No. PSC-93-0683-PCO-WS would be insufficient for Florida Cities Water Company to explain its positions.

3. Florida Cities Water Company intends to address the following matters at hearing. We oppose proposed Rule 25-30.435 and 25-30.020(2) and intend to provide testimony thereon at the hearing. We also oppose 25-30.433(3), but will only need to briefly elaborate further on the position of the Florida Waterworks Association, which we support. Finally, we intend to provide testimony in opposition to positions advocated by the Florida Fire Sprinkler Association in connection with proposed rule 25-30.465, which we support.

DOCUMENT NUMBER-DATE

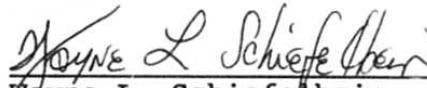
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#PSC-RECORDS/REPORTING

4. Florida Cities Water Company otherwise supports the positions taken by the Florida Waterworks Association in this proceeding, and does not anticipate a need to further independently comment on the proposed rules.

However, as needed, Florida Cities Water Company may request an opportunity at the hearing to respond to comments which may be filed by other participants in the proceeding, including Commission Staff.

Respectfully submitted,



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(904) 877-7191

Attorneys for
Florida Cities Water Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery to Christiana Moore, Esquire, Division of Legal Services, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32399-0850, on this 17th day of May, 1993.



Wayne L. Schiefelbein