



Southern States Utilities • 1000 Color Place • Apopka, FL 32703 • 407/880-0058

November 7, 1996

Ms. Blanca Bayó, Director  
Division of Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

via Federal Express

Re: Docket No. Undocketed -- Proposed Changes to Rule  
25-30.115 Uniform System of Accounts for Water and  
Wastewater Utilities to Incorporate the 1996 NARUC  
Uniform System of Accounts

Dear Ms. Bayó:

On behalf of Southern States Utilities, Inc. (SSU) I write to request a rule development workshop concerning the above-referenced rule and also to request that the workshop presently scheduled for November 13 be rescheduled to December 12.

SSU is particularly concerned with the changes made in the 1996 National Association of Regulatory Utility Commissioners Uniform Systems of Accounts (NARUC USOA) to establish new accounts for reclaimed water plant, expenses, and revenues, among other changes. SSU's concerns stem primarily from decisions the Commission made in Docket No. 950495-WS, as memorialized in Order No. PSC-96-1320-FOF-WS, issued October 30, 1996. (Said order is now on appeal before the First District Court of Appeals.) In that case, the Commission rejected the Florida Department of Environmental Protection (FDEP) definition of and facility requirements for reuse. SSU opposes any Commission rule which contemplates a reuse accounting classification in any way inconsistent with the FDEP's definition of and facility requirements for reuse. Accordingly, to exchange views with staff on the subject, SSU requests a workshop.

Representatives of SSU will have difficulty attending a workshop on November 13 due to other commitments. I therefore request that the workshop presently scheduled for November 13 be rescheduled until December 12, the day after the hearing in another water and wastewater industry rulemaking matter, Docket No. 960258-WS. I believe this proposal is beneficial because it affords interested persons more time to study the matter and because out-of-town industry representatives in Tallahassee for the Docket 960258-WS hearing may participate in the workshop without having to make two trips to Tallahassee.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS 3
- OTH 2

DOCUMENT NUMBER-DATE  
WATER FOR FLORIDA'S FUTURE  
11949-96 11/13/96  
FPSC-RECORDS/REPORTING

Blaca Bay6  
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If you have any questions or comments regarding the foregoing,  
please call me at (407) 880-0058, ext. 260.

Sincerely yours

A handwritten signature in cursive script that reads "Matthew Feil". The signature is written in dark ink and is positioned above the typed name and title.

Matthew Feil, Esq.  
Staff Attorney

cc: Ken Hoffman  
Wayne Schiefelbein  
Marty Deterding