

**RUDEN
McCLOSKEY
SMITH
SCHUSTER &
RUSSELL, P.A.
ATTORNEYS AT LAW**

215 SOUTH MONROE STREET
SUITE 815
TALLAHASSEE, FLORIDA 32301

ORIGINAL

(850) 681-9027
FAX: (850) 224-2032
KGC@RUDEN.COM

October 27, 1999

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

HAND DELIVERY

RECEIVED-FPSC
OCT 27 PM 2:06
RECORDS AND
REPORTING

Re: Docket No. 960258-WS
Petition to Adopt Rules on Margin Reserve and Imputation of Contributions-In-Aid-Of-Construction on Margin Reserve Calculation, by Florida Waterworks Association.

Dear Ms. Bayo:

Enclosed on behalf of Florida Waterworks Association, for filing in the above docket, are an original and 15 copies of a Notice of Substitution of Counsel.

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,

Kathryn G.W. Cowdery
Kathryn G.W. Cowdery

AFA
APP 1
CAF Blank GWC/l dv
CMU _____ Enclosures
CTR _____
EAG _____
LEG _____
MAS _____
OPC _____
PAI _____
SEC _____
WAW _____
OTH _____

RECEIVED & FILED
new
FPSC-BUREAU OF RECORDS

Done 10/28/99

DOCUMENT NUMBER-DATE

13199 OCT 27 99

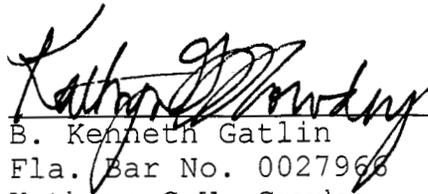
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition to Adopt Rules on Margin)
Reserve and Imputation of)
Contributions-In-Aid-Of-) Docket No. 960258-WS
Construction on Margin Reserve)
Calculation, by Florida Waterworks)
Association.)

NOTICE OF SUBSTITUTION OF COUNSEL

The undersigned hereby gives notice that the law firm of Ruden, McClosky, Smith, Schuster & Russell, P.A., is substituted as attorneys of record for Florida Waterworks Association ("FWA"), in the above-captioned case. Please note that the individual attorneys representing FWA for the firm are B. Kenneth Gatlin and Kathryn G.W. Cowdery. Kathryn G.W. Cowdery is substituted for Wayne L. Schiefelbein.

DATED this 27th day of October, 1999.



B. Kenneth Gatlin
Fla. Bar No. 0027968
Kathryn G.W. Cowdery
Fla. Bar No. 0363995
Ruden, McClosky, Smith, Schuster &
Russell, P.A.
215 South Monroe Street; Suite 815
Tallahassee, FL 32301
Phone: (850) 681-9027

Attorneys for Florida Waterworks
Association

CERTIFICATE OF SERVICE

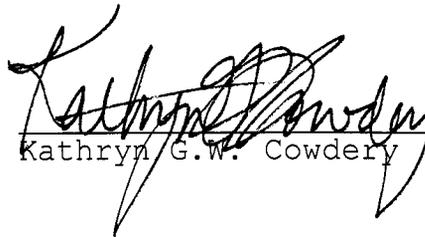
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail this 27th day of October, 1999, to:

Christiana T. Moore, Esq.
Florida Public Service
Commission
Division of Appeals
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302-0551

Stephen C. Burgess, Esq.
Office of Public Counsel
Claude Pepper Bldg., Room 812
111 West Madison Street
Tallahassee, FL 32399-1400

Matthew J. Feil, Esq.
Florida Water Services Corp.
1000 Color Place
Apopka, FL 32703


Kathryn G.W. Cowder