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A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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MULTINATIONAL PARTNERSHIP)

November 2, 1999

Via Federal Express

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

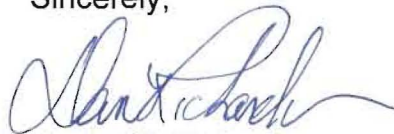
991660-445

Re: Notice; Application of United Water Florida, Inc. for Transfer of Majority Organizational Control of its Corporate Grandparent, United Water Resources, Inc. to Lyonnaise American Holding, Inc.

Dear Ms. Bayo:

On October 29, 1999 we sent to you a Petition for Emergency Temporary Variance of Rule. Enclosed herein is an original and four copies of a substitute page 5. The purpose of this substitution is to correct a typographical error on the very last line of page 5. In paragraph 11(d), it was erroneously stated that "the costs of photocopying and mailing a 125 -page notice to 340,000 customers will be excessive and unreasonable." The corrected statement changes 340,000 to 34,000. Your assistance in this substitution is appreciated. If you have any questions, please give me a call.

Sincerely,



Daniel D. Richardson

AFA _____
APP _____
CAF _____
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Facsimile: (904) 353-1673

8. The applicable rule or portion of the rule from which a variance is sought:

Fla. Admin. Code r. 25-30.030(4)(c) (1999)

9. The citation to the statute the rule is implementing is:

Fla. Stat. §367.071 (1997)

10. The type of action requested is:

Emergency Temporary Variance to allow an abbreviated form of territory description of United Water FL to be provided by mail to customers, agencies and utilities as well as in the newspaper publication of notice of the Petitioner's Application for Transfer of Majority Organizational Control

11. The specific facts that demonstrate a substantial hardship or a violation of principle of fairness that would justify a variance for the Petitioner are:

- a. The notice involves a merger of the grandparent corporation of the Florida corporation holding Certificates from the Commission.
- b. The legal descriptions of United Water FL's multiple territories consumes approximately 125 pages.
- c. United Water FL currently services approximately 34,000 customers who are to receive a mailed notice of the subject merger.
- d. The costs of photocopying and mailing a 125-page notice to 34,000 customers will be excessive and unreasonable. The