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September 14, 1998

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



Re: Docket No. 971663-WS

Petition of FLORIDA CITIES WATER COMPANY, seeking recovery of environmental litigation costs in a limited proceeding for its NORTH and SOUTH FT. MYERS DIVISION in Lee County and BAREFOOT BAY DIVISION in Brevard County,

Florida

Dear Ms. Bayo:

Enclosed, for filing in the above docket, are an original and fifteen (15) copies of Florida Cities Water Company's 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,
ACK	$\frac{1}{2}$
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WAS FORT LAUDERDALE - MIAMI - NAPLES - ST. PETERSBURG - SARASOTA - TALLAHASSEE - TAMPA - WEST PALM BEACH INC.



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of FLORIDA)				
CITIES WATER COMPANY, seeking)	Docket	No. 97166	3-WS	
recovery of environmental)				
litigation costs in a limited)				
proceeding for its NORTH and)	Filed:	September	14,	1998
SOUTH FT. MYERS DIVISION in)				
Lee County and BAREFOOT BAY)				
DIVISION in Brevard County,)				
Florida	_)				

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 Cities Water Company in the above-captioned docket.

DATED this 14th day of September, 1998.

B. KENNETH GATLIN

Fla. Bar No.: 0027966

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 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 Rosanne Gervasi, Esq., Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 and to Harold McLean, Esq., Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, FL 32399-1400, on this 14th day of September, 1998.

KATHRYN G.W. COWDERY