

GATLIN, WOODS, CARLSON & COWDERY

Attorneys at Law

a partnership including professional associations

The Mahan Station  
1709-D Mahan Drive  
Tallahassee, Florida 32308

TELEPHONE (904) 877-7191  
TELECOPIER (904) 877-9031

B. KENNETH GATLIN, P.A.  
THOMAS F. WOODS  
JOHN D. CARLSON  
KATHRYN G.W. COWDERY  
WAYNE L. SCHIEFELBEIN

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Proposed new, revised and repealed rules pertaining to water  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 the Florida Waterworks  
Association in the above docket are an original and 15 copies of  
the following:

5303-931. Florida Waterworks Association's Response to Order  
Establishing Procedures to be Followed at Rulemaking  
Hearing; and

ACK  5304-932. Supplemental Comments of Frank Seidman for the Florida  
Waterworks Association.

AFA \_\_\_\_\_  
APP 1 Please acknowledge receipt of the foregoing by stamping the  
CAF \_\_\_\_\_ enclosed extra copy of this letter and returning same to my  
attention. Thank you for your assistance.

CMU \_\_\_\_\_

CTR \_\_\_\_\_

EAG \_\_\_\_\_

LEE 1 \_\_\_\_\_

LIN 6 \_\_\_\_\_

CFC \_\_\_\_\_

RON 2 \_\_\_\_\_

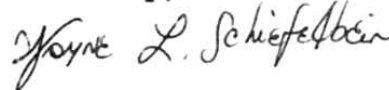
WLS/jhg

SEL 1 \_\_\_\_\_

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

WLS \_\_\_\_\_

Sincerely,



Wayne L. Schiefelbein

GIH \_\_\_\_\_ 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 WATERWORKS ASSOCIATION'S RESPONSE  
TO ORDER ESTABLISHING PROCEDURES TO BE FOLLOWED  
AT RULEMAKING HEARING

The Florida Waterworks Association, by and through its undersigned counsel, files this response to Order No. PSC-93-0683-PCO-WS:

1. The Florida Waterworks Association will file concurrently herewith Supplemental Comments on the Proposed Rules. These are in addition to the Comments filed by the Florida Waterworks Association on April 23, 1993 pursuant to the Commission's Notice of Rulemaking. Further, the Florida Waterworks Association asks the Commission to consider its Users Manual regarding the proposed used and useful rules. A copy of this manual was attached to the Staff Recommendation filed in this docket on December 31, 1992.

2. The Florida Waterworks Association requests that Frank Seidman, Bob Todd, Jim Perry and Debbie Swain be given an opportunity to address the Commission in support of its comments and submittals. We respectfully suggest that the 20 minutes allotted by Order No. PSC-93-0683-PCO-WS would be grossly insufficient for the Florida Waterworks Association to adequately explain its positions on the proposed rules.

3. The Florida Waterworks Association can express its concerns regarding the following proposed rules very briefly:

25-30.033(1)(j)  
25-30.034(1)(e)  
25-30.035(6)

DOCUMENT NUMBER-DATE

05303 MAY 17 8

FPSC-RECORDS/REPORTING

25-30.036(2)(d)  
25-30.037(3)(i)  
25-30.038(4)(n)  
25-30.433(10)  
25-30.436(4)(i)

25-30.038

25-30.433(7)

25-30.515

4. The Florida Waterworks Association needs a minimum of one (1) hour to explain its positions and otherwise address its concerns regarding the following proposed rules, exclusive of questions and answers:

25-30.432

25-30.433

5. Cumulatively, the Florida Waterworks Association will also need a substantial amount of time to express its opposition to the proposals filed by the Office of the Public Counsel on the following rules:

25-30.025

25-30.033

25-30.037

25-30.0371

25-30.071

25-30.117

25-30.432

25-30.433

25-30.436

25-30.455

6. As needed, the Florida Waterworks Association further requests an opportunity at the hearing to respond to comments which may be filed by other participants in this proceeding, including Commission Staff.

7. Order No. PSC-93-0683-PCO-WS also provided that "all persons who wish to participate at the hearing should file a list of the rules that the participant will not be commenting on," so long as the Commission approves them in their present form, the Florida Waterworks Association does not anticipate a need to further comment on the following proposed rules:

- 25-30.020
- 25-30.030
- 25-30.032
- 25-30.039
- 25-30.060
- 25-30.090
- 25-30.111
- 25-30.135
- 25-30.320
- 25-30.335
- 25-30.360
- 25-30.430
- 25-30.434
- 25-30.435
- 25-30.437
- 25-30.4385

25-30.4415

25-30.443

25-30.456

25-30.460

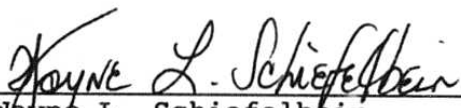
25-30.465

25-30.470

25-30.475

25-30.565

Respectfully submitted,

  
\_\_\_\_\_  
Wayne L. Schiefelbein  
Gatlin, Woods, Carlson & Cowdery  
1709-D Mahan Drive  
Tallahassee, FL 32308  
(904) 877-7191

Attorneys for the  
Florida Waterworks Association

**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