



Florida Electric Cooperatives Association

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Handwritten initials
**ORIGINAL
FILE COPY**

July 31, 1992

Mr. Steve Tribble, Director
Division of Records & Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32301

Re: Docket 920227-EU, Filing and
Evaluation of Submittals

Dear Mr. Tribble:

Enclosed please find the original and 15 copies of Florida
Electric Cooperatives Association's comments to staff's proposed
amendments to Rule 25-9.053, F.A.C. to be filed in the above
referenced docket.

Sincerely,

Michelle L. Hershel
Director of Regulatory Affairs

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FPC-RECORDS/REPORTS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-9.053,)
F.A.C., Filing and Evaluation)
of Submittals)

Docket No.
920227-EC

FLORIDA ELECTRIC COOPERATIVES ASSOCIATION'S
COMMENTS TO PROPOSED FINAL VERSION OF RULE 25-9.053
AND REQUEST FOR HEARING

The Florida Electric Cooperatives Association (FECA), on behalf of the 16 electric distribution cooperatives in Florida and two generation and transmission electric cooperatives - Seminole Electric Cooperative and Alabama Electric Cooperative, files the following comments on staff's proposed amendments to Rule 25-9.053, F.A.C.:

FECA does not object to the Commission's comparison of cost and operating data from a similarly situated utility when a cooperative has proposed a rate structure change. However, the Commission should not limit their comparison to investor-owned utilities. Since electric cooperatives' load characteristics may be inconsistent with those of investor-owned utilities a comparison between cooperatives would be more appropriate.

The inclusion of the phrase "public electric utilities" in Staff's proposal restricts the Commission's comparison data to data from an investor-owned utility. FECA suggests that "public electric utility" be changed to "electric utilities." The definition of "electric utilities" pursuant to Section 366.02(2), Florida Statutes (1991) includes municipal, investor-owned, or

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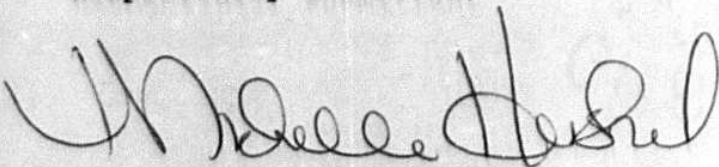
cooperative electric utilities. FECA's proposed change does not preclude the Commission from making a comparison between an electric cooperative and an investor-owned utility if necessary, but will provide the Commission with other comparison options that are more appropriately designed for an electric cooperative.

FECA requests that section (2) of proposed Rule 25.9.053 be amended as follows:

(2) The utility may submit actual cost and operating data to support its proposed change in rate structure. If the utility does not submit actual cost and operating data, the Commission ~~shall~~ may evaluate the proposed change in rate structure on the basis of cost and operating data from one of more comparably situated ~~public~~ electric utilities ~~which-the-commission determines-to-be~~ most similar to the filing utility. Data from the comparable utilities may be considered in conjunction with all submitted information which is specific to the filing utility.

FECA respectfully requests that the Commission amend Proposed Rule 25-9.053 in accordance with the above comments. FECA also requests a hearing on the proposed rule.

Respectfully submitted,



Michelle L. Hershel
Director of Regulatory Affairs