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November 26, 2001

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

011351-ET

RE: Docket No. ~~011531-EI~~

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Public Counsel's Draft Comments for filing in the above-referenced docket.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Robert D. Vandiver
Associate Public Counsel

RDV/dsb

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Proposed revisions to Rule 25-6.044,)	
F.A.C., Continuity of Service, Rule 25-6.0455,)	
F.A.C., Annual Distribution Service Reliability)	DOCKET NO. 011351-EI
Report, and new Rule 25-6.0456, F.A.C.,)	FILED: November 26, 2001
Distribution Reliability and Service Quality)	
Standards.)	
)	

DRAFT COMMENTS

The Office of Public Counsel (OPC) supports the staff's effort to improve the quality of electric service to Florida citizens. OPC will participate in the rulemaking process to offer input to further strengthen Florida Public Service Commission Rules to serve the public interest.

The staff proposal amends the definitions contained in Rule 25-6.044, and the reporting standards of Rule 25-6.0455, Florida Administrative Code. The staff has also proposed a new Rule 25-6.0456, which establishes a credit to customers that experience more than five (5) service interruptions during a calendar year. The credit is equal to the customer's average total monthly bill for the rate class.

OPC supports the concept of a customer credit for poor service. Present rules do not provide such a credit but rather only have utilities report on such interruptions. See present Rules 25-6.044, 25-6.045, Florida Administrative Code. OPC believes that a properly structured customer credit for excessive service failures will provide an incentive for improved electric service for Florida consumers. Adoption of rules that apply negative incentives for bad service will serve to eliminate the pockets of bad service that exist around the State. With a monetary incentive, OPC believes that any existing areas with substandard service will quickly disappear. This incentive is presently lacking under the present rules that require the company to simply report its failures. Self-enforcing

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rules are effective tools that lessen the need for regulatory intervention, while increasing the obligation of the utility to its customer body for quality service.

Respectfully submitted,

Jack Shreve
Public Counsel


Robert D. Vandiver
Associate Public Counsel

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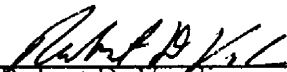
Attorneys for the Citizens
of the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 011351-EI**

I HEREBY certify that a copy of the foregoing DRAFT COMMENTS have been served by
*hand delivery or U.S. Mail to the following parties of record on this 26th day of November, 2001.

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