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May 17, 1996

960623-EI

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 33299-0870

RE: Petition of Florida Power & Light Company,  
Florida Power Corporation, Tampa Electric Company,  
and Gulf Power Company to Initiate a Rulemaking to  
Amend Rule 25-6.078, Schedule of Charges and  
Rule 25-6.082, Records and Reports

Dear Ms. Bayo:

Enclosed for filing are the original and 15 copies of the Petition of Florida Power & Light, Florida Power Corporation, Tampa Electric Company, and Gulf Power Company to Initiate a Rulemaking to Amend Rule 25-6.078, Schedule of Charges and Rule 25-6.082, Records and Reports.

Please acknowledge your receipt of the above filing on the enclosed copy of this letter. Thank you for your assistance in this matter.

Sincerely,

William H. Feaster

Enclosures

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05523 MAY 17 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Power & Light )  
Company, Florida Power Corporation; )  
Tampa Electric Company, and Gulf Power )  
Company to Initiate a Rulemaking to Amend )  
Rule 25-6.078, Schedule of Charges and )  
Rule 25-6.082, Records and Reports )

Docket No. \_\_\_\_\_

**PETITION OF FLORIDA POWER & LIGHT COMPANY,  
FLORIDA POWER CORPORATION,  
TAMPA ELECTRIC COMPANY, and  
GULF POWER COMPANY  
TO INITIATE A RULEMAKING TO AMEND  
Rule 25-6.078, Schedule of Charges  
and Rule 25-6.082, Records and Reports**

COMES NOW, Florida Power & Light Company ("FPL"), Florida Power Corporation ("FPC"), Tampa Electric Company ("TECO") and Gulf Power Company ("Gulf") (collectively referred to as "Petitioners") pursuant to Florida Public Service Commission (the "Commission") Rule 25-22.012, Petition to Initiate Rulemaking Proceedings, F.A.C., and hereby requests the Commission to initiate a rulemaking to amend Rule 25-6.078, Schedule of Charges, F.A.C. and Rule 25-6.082, Records and Reports, F.A.C. Petitioners further sets forth the following in support of their Petition:

1. The Petitioners are each public utilities subject to the jurisdiction of the Commission pursuant to Chapter 366, Florida Statutes. FPL's general offices are located at 9250 West Flagler Street, Miami, Florida 33174. FPC's general offices are located at 3201 34th Street South, St. Petersburg, Florida 33711. TECO's general offices are located at 702 North Franklin Street, Tampa, Florida 33602. Gulf's general offices are located at 500 Bayfront Parkway, Pensacola, Florida 32501.

Orders, notices, or other pleadings relevant hereto should be served on:

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Miami, Florida 33174

Edward F. Tancer  
Attorney  
Florida Power & Light Company  
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North Palm Beach, Florida 33408

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FPSC-RECORDS/REPORTING

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2. The Petitioners request that the Commission initiate a rulemaking, pursuant to the Commission's authority under Sections 366.05(1) and 350.127(2), F.S., for the purpose of amending Rule 25-6.078(3), Schedule of Charges, F.A.C. and Rule 25-6.082(1) Records and Reports, F.A.C. Specifically, Petitioners seek to amend the rule to require the updating of the Estimated Average Cost Differential to be done every third year, rather than on the present annual basis.

3. Petitioners request that section (3) of Rule 25-6.078 be modified as follows:

- (3) Detailed supporting data and study results used to determine the Estimated Average Cost Differential for underground and overhead distribution systems shall be concurrently filed by the utility with the Commission and shall be updated annually every third year on the first day of April using cost data developed from the most recent 12 month period.

Petitioners' changes to the rule are indicated by underlined and strike out.

4. Petitioners request that section (1) of Rule 25-6.082 be modified as follows:

- (1) To insure the development and availability of appropriate data necessary to satisfy the annual reporting requirements of Rule 25-6.078(2)(3) herein,

each utility will undertake to establish and maintain separate records or sub-accounts for underground distribution construction, operation and maintenance costs.

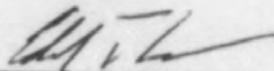
Petitioners' change to the rule is indicated by underline and strike out.

5. The Petitioners believe that changing the Estimated Average Cost Differential on an annual basis is not necessary given the relatively minor changes that occur in costs from year to year. The rule change will result in reduced workload for the Commission and for the Petitioners and thereby reduce costs to the Petitioners' customers. This reduced cost would occur without significantly impacting charges to applicants for underground service.

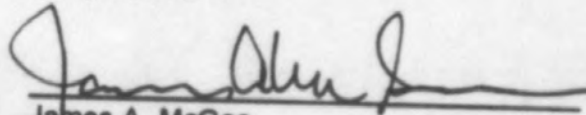
WHEREFORE, Petitioners request the Commission to initiate a rulemaking amending Rule 25-6.078, and Rule 6.082 F.A.C. as set forth herein.

Date submitted:

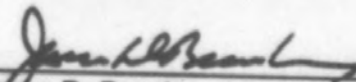
Respectfully submitted,



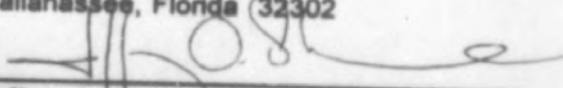
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