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February 12, 1997

HAND DELIVERED

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

Re: Petition to Initiate Changes Relating to Rule 25-6.049,
F.A.C., Measuring Customer Service by micrometer
Corporation; Docket No. 951483-EU

Petition to Initiate Rulemaking to Amend Rule 25-6.049,
F.A.C., Measuring Customer Service, by Vistana
Management, Ltd.; Docket No. 960020-EU

Dear Ms. Bayo:

Enclosed for filing in the above dockets are fifteen (15)
copies of Tampa Electric Company's written comments concerning
proposed changes to Commission Rule 25-6.049.

Please acknowledge receipt and filing of the above by stamping
the duplicate copy of this letter and returning same to this
writer.

Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley
James D. Beasley

- ACK
- AFA
- APP
- C&F
- CIJ
- CTR
- E
- LE
- LYN
- CPC
- RLH
- SEC
- WIS
- ST

JDB/pp
Enclosures

cc: Richard Bellack (w/enc.)
Connie Kummer (w/enc.)
Angela Llewellyn (w/enc.)

DOCUMENT NUMBER DATE
04583 FEB 12 1997
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**COMMENTS OF TAMPA ELECTRIC COMPANY
DOCKET NOS. 951485-EU and 960020-EU, ORDER NO. PSC-97-0060-NOR-EU
DOCKET NO. 951485-EU, ORDER NO. PSC-97-0074-NOR-EU**

Tampa Electric supports the language of the proposed changes to Rule 25-6.049. The proposed amendment would still require individual metering by the utility for most facilities, but would allow non-utility entities to meter individual occupancy units behind approved master-metered delivery points and would appropriately extend the master-metering exception to time-share facilities.

Tampa Electric's main points of concern relate to protection of the direct relationship between the end-use Customer, the utility and the Florida Public Service Commission (FPSC) and the assurance of full recovery of its cost to serve its Customers.

Master-metering was limited in the early 1980's in part to encourage conservation. Conservation and the provision of other utility programs and services is best accomplished if the utility has direct contact with the Customer through the individual metering and billing relationship. That relationship, along with FPSC regulation of the utility, provides a multitude of protections for the Customer. The FPSC should jealously guard its jurisdiction to protect end-use consumers. That protection would be lost if microMETER's proposed rule changes were allowed to go into effect with unregulated submetering firms being permitted to provide metering and billing services for landlords and condominium associations. These protections include, among others, rules and regulations regarding:

- meter accuracy
- end-use consumer recourse against high-bills
- timeliness of billing
- disconnection of service
- deposits and interest on deposits
- late payment penalties
- amount and accuracy of billing information

As stated in the Staff's recommendation, rates are developed based on coincidence of peak and load shape for the various rate classes. Tampa Electric Company agrees with the Staff that if master-metering were to be made generally available, a special rate for master-metered residences would need to be developed to ensure that utilities fully recover the cost to serve these types of Customers

Regarding the petition for rulemaking submitted by Vistana Management Ltd., Tampa Electric Company supports the position taken by the Commission and the Staff in the Commission's Notice of Rulemaking issued on January 17, 1997. Timeshare resorts operate, for all practical purposes, with the same load patterns as hotels and motels. The connection between the owners and the utility is fleeting and remote, whereas the connection is most close and appropriate

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between the facility's management and the utility. Therefore, existing commercial rates applied to master-meters for the entire facility could appropriately be applied to timeshare resorts.