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JON C. MOYLE, JR.  
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June 16, 1999

**BY HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
4750 Esplanade Way, Room 110  
Tallahassee, FL 32399

RECEIVED-FPSC  
99 JUN 22 PM 4: 26  
RECORDS AND  
REPORTING

**Re: Generic Investigation into the Requirement for Individual Electric  
Metering by Investor-Owned Electric Utilities Pursuant to Rule 25-6.049(5)(a),  
Florida Administrative Code, Docket No. 990188-EI**

Dear Ms. Bayo:

Enclosed is the original and fifteen (15) copies of a Petition for Leave to Intervene on behalf of Valencia Area Condominium Association, Inc. and Point Management, Inc. for filing in the above-referenced matter.

Sincerely,



Jon C. Moyle, Jr.

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

JCM/jd

Enclosures  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
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FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: GENERIC INVESTIGATION INTO  
THE REQUIREMENT FOR INDIVIDUAL  
ELECTRIC METERING BY INVESTOR-OWNED  
ELECTRIC UTILITIES PURSUANT TO  
RULE 25-6.049(5)(a), FLORIDA ADMINISTRATIVE CODE

Docket Number: 990188-EI  
Filed: June 22, 1999

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**PETITION FOR LEAVE TO INTERVENE**

Pursuant to Rule 25-22.039, Florida Administrative Code, Valencia Area Condominium Association, Inc. (hereinafter "VALENCIA") and Point Management, Inc. (hereinafter "POINT MGMT.") (collectively, the "PETITIONERS"), file this Petition for Leave to Intervene in the subject cause. In support of the instant request, the PETITIONERS state as follows:

**I. NAME AND ADDRESS OF AGENCY AND PETITIONER**

1. The name and address of the affected agency is:  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850
  
2. The name and address of the Petitioners is:  
Valencia Area Condominium Association, Inc.  
7000 W. Atlantic Avenue  
Delray Beach, Florida 33446  
  
and  
  
Point Management, Inc.  
7000 W. Atlantic Avenue  
Delray Beach, Florida 33446
  
3. All pleadings, motions, orders and other documents directed to the PETITIONERS are to be served on:

DOCUMENT NUMBER-DATE

07551 JUN 22 89

FPSC-RECORDS/REPORTING

Jon C. Moyle, Jr.  
Moyle, Flanigan, Katz, Kolins, Raymond & Sheehan, P.A.  
210 S. Monroe Street  
Tallahassee, Florida 32301

**II. EXPLANATION OF HOW SUBSTANTIAL INTERESTS OF PETITIONERS WILL  
BE AFFECTED BY COMMISSION DETERMINATION**

4. VALENCIA is the association for the condominium buildings known as Valencia A-I, and is located at Kings Point at Delray Beach, Florida. Petitioner, POINT MGMT., is a management company for the Kings Point communities managing, inter alia, community property, including buildings for which construction commenced prior to January 1, 1981.
5. The investigation which forms the subject of the instant docket will explore a variety of issues related to master metering and individual metering of building units.
6. Petitioner, VALENCIA, represents the interest of the owners of the condominium building Valencia A-I, the vast majority of whom are elderly individuals living on fixed incomes. Petitioner, POINT MGMT., manages condominium association property and is in the business of managing condominium buildings. Both of these entities' interests will be substantially affected by the generic investigation into master metering which is the subject of this docket. VALENCIA represents condominium owners who have electric service that is metered and billed by Florida Power & Light. POINT MGMT. manages properties that receive electric service that is metered and billed by, among others, Florida Power & Light.
7. The conversion from individual electric metering to master metering would affect the owners of the condominium which VALENCIA represents, and the condominium association property that POINT MGMT. currently is in the business of managing.

Individual and master metering will be considered in this docket. Therefore, the decisions made by the Commission in this case will substantially affect the PETITIONERS.

WHEREFORE, the PETITIONERS respectfully request the entry of an order granting them leave to intervene into the instant proceeding and be afforded all rights and obligations of a party with intervenor status.

Dated this 22nd day of June, 1999.

Respectfully submitted,

MOYLE, FLANIGAN, KATZ,  
KOLINS, RAYMOND & SHEEHAN, P.A.  
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Tallahassee, Florida 32301  
(850) 681-3828 -- Telephone  
(850) 681-8788 -- Facsimile  
Attorneys for PETITIONERS

By:   
JON C. MOYLE, JR.  
Florida Bar No.: 727016

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Petition for Leave to Intervene has been furnished by hand delivery\* or by U.S. Mail to the following parties of record this 22nd day of June, 1999:

Robert V. Elias\*  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Gunter Building, Room 370N  
Tallahassee, Florida 32399-0850

Florida Electric Cooperatives  
Association, Inc.  
Michelle Hershel  
Posts Office Box 590  
Tallahassee, FL 32302

Florida Power & Light Company  
Bill Walker  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859

Florida Power Corporation  
James A. McGee  
Post Office Box 14042 (A5A)  
St. Petersburg, FL 33733-4042

Florida Public Utilities Company  
John T. English  
Post Office Box 3395  
West Palm Beach, FL 33402-3395

Gulf Power Company  
Susan D. Ritenour  
One Energy Place  
Pensacola, FL 32520-0780

Legal Environmental Assistance  
Foundation

Gail Kamaras, Director  
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Tallahassee, FL 32303-6290

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Angela Llewellyn  
Regulatory Affairs  
Post Office Box 111  
Tampa, FL 33601-0111

  
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JON C. MOYLE, JR.