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November 11, 1999

West Palm Beach Office
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BY HAND DELIVERY

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

Dear Ms. Bayo:

981104-EU

On behalf of my clients, Valencia Condominium Association and Point Management, Inc., I would like to request that a public hearing be conducted regarding the proposed changes to Rule 25-6.049, *Florida Administrative Code*, the Commission's master metering rule. Moreover, my clients request that a statement of estimated regulatory costs be prepared by the Commission regarding its proposed rule changes. There has been little justification or support as to how this proposed rule achieves the purposes of the law from which it purports to derive its rulemaking authority. As a lower cost alternative to the proposed rule as required per Section 120.541, F.S., my client would propose that the Commission not adopt the proposed rule. Indeed, in cases previously considered by this Commission (Redington Towers, Docket No. 971542-EI), filings were made which indicated that using a master meter as compared to individual metering resulted in lower costs to the end consumer. Your proposed rule amendment, which purports not to permit buildings constructed prior to 1981 to seek master metering, unduly imposes a higher regulatory cost on the regulated public.

Additionally, on behalf of my clients, I would like to request that the Commission hold a workshop/hearing in the South Florida area, so that concerns about the proposed rule change can be voiced by those most likely affected. Many of these people find it burdensome to travel to Tallahassee and it would be unreasonable to deny them a meaningful opportunity to present testimony and otherwise participate in the workshop/hearing due to their difficulty in making the trip to Tallahassee.

- AFA _____
- APP 2 _____
- CAF _____
- CMU _____
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- SEC 1 _____
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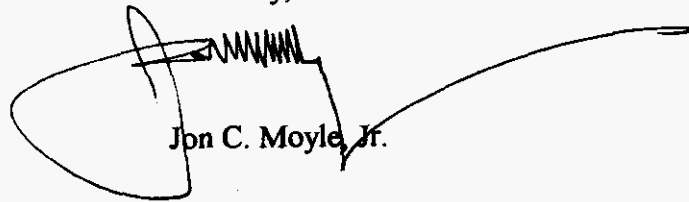
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Thank you for your attention to this matter. If you have any questions or need additional information, please let me know.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop on the left and a series of vertical strokes on the right, followed by a long horizontal line extending to the right.

Jon C. Moyle, Jr.

JCM/jd

cc: Mary Ann Helton, Esquire
David Smith, Esquire
(both by telefax)