

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Adoption of New
Rule 25-6.0343, F.A.C., Standards of
Construction - Municipal Electric Utilities and
Rural Electric Cooperatives

DOCKET NO. 060512-EU
Filed: September 29, 2006

COMMENTS OF
FLORIDA MUNICIPAL ELECTRIC ASSOCIATION, INC.,
IN RESPONSE TO SUPPLEMENTAL COMMENTS FILED BY THE FLORIDA
ELECTRIC COOPERATIVES ASSOCIATION, INC.

Florida Municipal Electric Association, Inc. ("FMEA"), by and through undersigned counsel, on behalf of its thirty-four municipal electric utility members in Florida,¹ hereby submits its comments, pursuant to Order No. PSC-06-0793-PCO-EU, in response to the Supplemental Comments filed by the Florida Electric Cooperatives Association, Inc., ("FECA") regarding proposed rule 25-6.0343.

On September 15, 2006, FECA filed a Motion for Leave to File Supplemental Comments, along with Supplemental Comments on Proposed Rule 25-6.0343. The Supplemental Comments are in support of an alternative to the rule the Commission proposed. In Order No. PSC-06-0793-PCO-EU, the Commission granted FECA's motion to file its Supplemental Comments, and is now allowing all interested parties to file responsive comments thereto by September 29, 2006.

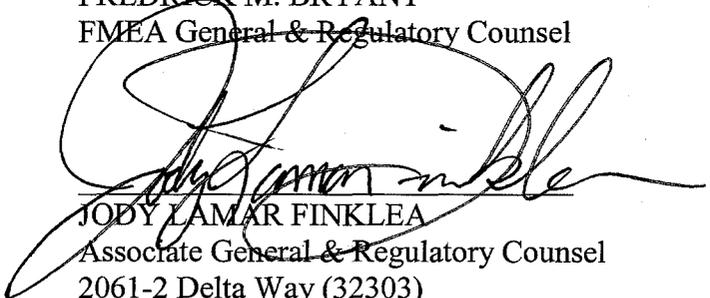
¹ FMEA is comprised of the following municipal electric utility members: City of Alachua, City of Bartow, City of Blountstown, City of Bushnell, City of Chattahoochee, City of Clewiston, City of Fort Meade, Fort Pierce Utilities Authority, City of Gainesville d/b/a Gainesville Regional Utilities, City of Green Cove Springs, Town of Havana, City of Homestead d/b/a Homestead Energy Services, JEA, City of Jacksonville Beach d/b/a Beaches Energy Services, Utility Board of the City of Key West, Florida d/b/a Keys Energy Services, Kissimmee Utility Authority, City of Lake Worth, City of Lakeland d/b/a Lakeland Electric, City of Leesburg, City of Moore Haven, City of Mount Dora, Utilities Commission of the City of New Smyrna Beach, City of Newberry, City of Ocala d/b/a Ocala Electric Utility, Orlando Utilities Commission, City of Quincy, Reedy Creek Improvement District, City of St. Cloud, City of Starke, City of Tallahassee, City of Vero Beach, City of Wauchula, City of Williston, and City of Winter Park.

FMEA hereby expresses its support for FECA's proposed alternative rule ("Alternative Rule"). The Alternative Rule is the fruit of a collaborative process among FMEA, FECA, and PSC staff. FMEA believes the Alternative Rule accomplishes the Commission's goals, and at the same time alleviates the sub-delegation and other concerns raised in earlier comments.

FMEA appreciates the diligent efforts of PSC staff, and encourages the Commission to adopt the Alternative Rule.

RESPECTFULLY submitted this 29th day of September 2006.

FREDRICK M. BRYANT
FMEA General & Regulatory Counsel



JODY LAMAR FINKLEA
Associate General & Regulatory Counsel
2061-2 Delta Way (32303)
Post Office Box 3209
Tallahassee, Florida 32315-3209
Telephone (850) 297-2011
Facsimile (850) 297-2014
Email: fred.byrant@fmpa.com
jody.lamar.finklea@fmpa.com
Florida Bar No. 0336970

**Attorneys for Florida Municipal
Electric Association, Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail and U.S. mail this 29th day of September 2006, to the following:

Florida Public Service Commission Lawrence Harris 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <i>lharris@psc.state.fl.us</i>	Embarq Susan S. Masterton Mailstop: FLTLHO0102 1313 Blair Stone Road Tallahassee, Florida 32301 <i>susan.masterton@embarq.com</i>
Lee Cty. Electric Cooperative, Inc. John A. Noland Luis E. Rivera, II Henderson, Franklin, Starnes & Holt Post Office Box 280 Ft. Myers, Florida 33902-0280 <i>donald.schleicher@lcec.net</i> <i>dennie.hamilton@lcec.net</i>	Time Warner Telecom of Florida Howard E. Adams Peter M. Dunbar Pennington, Moore, Wilkinson, Bell & Dunbar, P.A. Post Office Box 10095 Tallahassee, Florida 32302-2095 <i>gene@penningtonlaw.com</i>
Verizon Florida, Inc. Dulaney L. O'Roark, III Legal Department Six Concourse Parkway, Ste. 600 Atlanta, Georgia 30328 <i>de.oroark@verizon.com</i>	Time Warner Telecom of Florida, L.P. Carolyn Marek, VP of Govt. Affairs 233 Bramerton Court Franklin, TN 37069 <i>Carolyn.Marek@twtelecom.com</i>
Trevor G. Underwood 2425 Sunrise Key Blvd. Fort Lauderdale, Florida 33314-3827	Squire, Sanders Law Firm Charles A. Guyton 215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1804 <i>cguyton@ssd.com</i>
BellSouth Telecommunications, Inc. James Meza, III c/o Nancy H. Sims 150 South Monroe Street, Rm. 400 Tallahassee, Florida 32301-1556 <i>nancy.sims@bellsouth.com</i>	Florida Electric Cooperatives Association, Inc. William Willingham/Michelle Hershe 2916 Apalachee Parkway Tallahassee, FL 32301 <i>fecabill@earthlink.net</i>

<p>Florida Cable Telecommunications Association, Inc. Michael A. Gross 246 E. 6th Avenue, Ste. 100 Tallahassee, Florida 32303 <i>mgross@fcta.com</i></p>	
---	--



JODY LAMAR FINKLEA
Florida Bar No. 0336970