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FLORIDA PUBLIC SERVICE COMMISSION  
DIVISION OF APPEALS

The Southern Bell Telephone and Telegraph Company

Jack L. Haskins  
Director of Rates and Regulatory Matters  
Assistant Secretary

February 28, 1996

Ms. Mary Anne Helton, Esquire  
Division of Appeals  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee FL 32399-0862

Dear Ms. Helton

RE: Docket No. **951485-EU**

Attached is Gulf Power Company's Comments that were requested in your memorandum dated January 29, 1996.

Sincerely,

ATK

ATK



lw

Attachment

cc Beggs and Lane  
Jeffrey A. Stone, Esquire

4TH

Our business is customer satisfaction

DOCUMENT NUMBER-DATE

02636 MAR-58

FPSC-RECORDS/REPORTING

## GULF POWER'S COMMENTS

1. Pursuant to Rule 25-6.049(5)(a), the utility in time shares for which construction commenced after January 1, 1981 must be individually metered. Vietnam seeks to amend the rule so that time share buildings may be master metered. Is it appropriate to allow time shares to be master metered? If time shares were master metered, what would be the impact on the utility, if any?

ANSWER:

Yes, it would be appropriate to include time-share condominiums/apartments and time-share campgrounds as an exception to the requirement for individual electric metering set forth in section 25-6.049 (5)(a), Florida Administrative Code. Time-share condominiums/apartments operate, essentially, like a motel or hotel. Motels and hotels are included as exceptions under section 25-6.049 (5)(a)(3), FAC. Time-share condominiums could be included in that same section. Likewise, time-share campgrounds could be included as an exception under section 25-6.049 (5)(a)(4), FAC.

Since we do not identify time-share condominiums/apartments/campgrounds on our billing system, we are unable to identify the potential impact on Gulf Power of allowing master metering in those locations. However, in general, for any new Customers, the only impact would be on Gulf's forecasted information, i.e., we might have forecasted 100 new residential Customers and end up with one master-metered commercial Customer. However, for any existing Customers that require to have one master meter in lieu of individual meters, Gulf could be affected in several ways. First, it would be necessary to bring all the individual meters back in stock and possibly set a demand-type meter. There would also be a revenue (shortfall)/gain associated with going from the residential (P5) rate on individual meters to a commercial (GS/GSD/LP) rate on the master meter which would probably impact the Company until the next general rate case.

2. Pursuant to Rule 25-6.049(5)(a), all meters slots must be individually metered. Is it appropriate to allow overnight occupancy meters to be master metered? If meters were master metered, what would be the impact on the utility, if any?

ANSWER:

Yes, it would be appropriate to allow overnight occupancy meters to be master metered as is currently allowed. For separate, specially-designated areas for overnight occupancy at trailers, mobile home and recreational vehicle parks where permanent residency is not established," section 25-6.049 (5)(a)(4), FAC. Gulf does not see a difference in recreational vehicles versus "recreational" boats. This issue has been brought up by our Customers in the past.

The response to the second part of this question is the same as that found in the response to the second part of question number one:

3. MicroMETER seeks to amend Rule 25-6.049 so that the individual metering requirement may be accomplished by a non-utility entity. The utility would install a master meter and bill the building owner or manager, who would be responsible for submetering and billing the individual unit occupants. Is it appropriate to allow a non-utility to be responsible for the "individual metering" requirement?

ANSWER:

Non-utilities are permitted, by Commission rule, to be responsible for the "individual metering" requirement in existing, as well as future, master-metered situations that were either master metered prior to January 1, 1981, (grandfathered in) or fall under one of the exceptions to the rule. As required by section 25-6-049(5)(b)(7), PAC, Gulf's utility address submetering and the allocation of the cost of electricity in master-metered situations. The Customer of record may use submetering or any other reasonable apportionment method to allocate the cost of electricity to individual tenants. However, the Customer of record must receive no more from his tenants than the actual cost of electricity as billed by Gulf Power. Unfortunately, it is impossible to monitor and enforce this requirement unless we are notified by individual tenants of a problem. Thus, normally the individual tenants would be at the mercy of the Customer of record to fairly allocate the cost of electricity.

4. Do you presently bill any master metered customers at a residential rate? If so, is one RS customer charge assessed for all customers, or does each customer pay the RS customer charge?

ANSWER:

The only "master-metered" customers that Gulf should have on the Residential rate are those such as a house and a trailer at the same location that were master metered prior to January 1, 1981. These Customers were previously billed under a multiple unit provision in Gulf's tariff. When the multiple unit provision was in effect, the Customer was charged a Customer Charge for each family or housekeeping unit served through the same meter, i.e., for a house and a trailer served by one meter, the Customer of record would pay two Customer Charges. The multiple unit provision was removed from Gulf's tariff in December, 1990. Since that time, these types of Customers have paid only one Customer Charge. The answer to the second part of this question is that the Customer of record pays only one Customer Charge.

Gulf is presently in the process of verifying that all master-metered locations are billed on a commercial rate except for the situation mentioned above of a house and a trailer on one meter. If there are any accounts being billed incorrectly, the records will be corrected and the Customer of record notified.

5. Pursuant to Rule 25-6-049 (5) (a), the types of buildings listed in this paragraph for which construction commenced prior to January 1, 1981 may be master metered. What problems, if any, have been encountered with those buildings that were grandfathered in under this paragraph?

ANSWER:

Gulf is not aware of any problems with master-metered accounts that were grandfathered in beginning January 1, 1981. The individual tenants served by the master meter essentially have no relationship with Gulf Power, and we are not aware of any of them having contacted Gulf about problems they might have had with master metering. Gulf's contact would normally only be with the Customer of record. If Gulf is contacted by individual tenants served by a master meter, Gulf would, of course, respond to their questions/concerns.