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March 12, 1999

BY HAND DELIVERY

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

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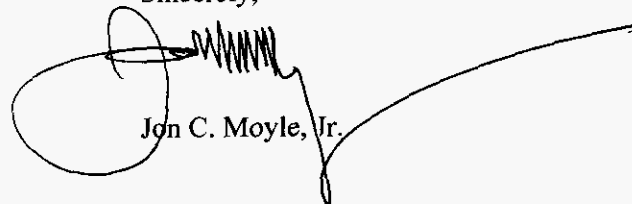
Dear Ms. Bayo:

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, as a lower cost alternative to the proposed rule, 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 would not permit buildings constructed prior to 1981 to seek master metering, unduly imposes a higher regulatory cost on the regulated public. Furthermore, 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.

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 difficult to travel to Tallahassee.

Thank you for your attention to this matter. If you have any questions or need additional information, please let me know.

Sincerely,



Jon C. Moyle, Jr.

- ACK _____
- AFA _____
- APP |
- CAF _____
- CMU _____
- CTR _____
- EAG |
- LEG _____ JCM/jd
- LIN _____ ec: Rob Vandiver
- OPC _____ David Smith
- RCH | (both by telefax)
- SEC |
- NAS _____
- DTH | *ag to Hong*

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

Done 3/18/99

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Management, Inc.:
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