

FLORIDA ASSOCIATION OF PLUMBING • HEATING • COOLING CONTRACTORS

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July 19, 2000

The Honorable Christiana T. Moore Hearing Officer Public Service Commission 4075 Esplanade Way Tallahassee, Florida 32399

BY HAND DELIVERY

RE: Docket Number 980643 El-In re: Proposed amendments to Rules 25-6.135, F. A. C., Annual Reports; 25-6.1351, F.A.C., Cost Allocation and Affiliate Transactions, and 25-60436, F. A. C., Depreciation

Dear Hearing Officer Moore:

On behalf of the Florida Association of Plumbing Heating & Cooling Contractors (FAPHCC), the following comments are submitted following the rule hearing held on June 22, 2000.

- 1. FAPHCC supports the rule changes.
- 2. The rule changes are necessary as utilities expand into non-regulated activities. The testimony provided by the construction contractors at the hearing underscore the gray area which now exists between regulated activities and non-regulated activities. The rules begin to clarify the responsibilities of regulated utilities as this expansion occurs.

Sincerely,

APP Mone Cricker Watson
CAF
CMP | Richard Watson
CIR | Legislative Counsel
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