

sewage treatment plant would be required on that land assigned to these sites
(b) Nothing to report as the original plan was not modified

2. The chronology of actual construction of the campground follows
 - (a) 1972 - Sites 1 through 123 were started, completed in March 1973.
 - (b) 1973 - Sites 124 through 159, and sites 208 through 243 were completed, leaving only the land on which the waste disposal system was located
 - (c) 1981 - The County sewer interceptor was finally completed and Dunedin Beach Campground connected to the County System immediately.
 - (d) 1981 - Sites 170 through 207 were started, completed in 1982. Sites 160 through 169 have not been built, as we needed some room for storage.

3. Most of this data is unavailable. I did find the permit for the construction of the clubhouse, and a letter from the Board of County Commissioners giving approval for the construction of the park (copies attached) The timing of the construction was subordinate to the hook up of the County Sewage System.

4. Recreational vehicles residing in a Campground or Recreational Vehicle Park in the State of Florida must conform to ANSI standard A119.5, and Florida Chapter 320.01, which limits the size of Park Trailers, our largest units, to 400 square feet measured on the outside of the unit.

5. (a) The total bill for the master meter section of the park for the period February 3, 1997 to August 1, 1997 was \$20810.66 (Includes all streetlights, utility pumps, buildings, pool etc.). Each site has its own individual meter, which is read each month. The master bill is divided by the total kilowatts used and that number is multiplied by the sub-meter reading. Each customer pays for exactly the electricity used in that unit.
 - (b) Because the park is only 15-20% occupied in May, June, and July, I would like to use the usage when the park is full or nearly full as it more clearly reflects the electrical use of my customers. It would be difficult to determine how many days each site is used and come up with an average during these low occupancy months. The fully occupied months, or nearly full, are November through April. The total electrical use during that period was \$25,221.42. The individual site usage averaged 265.9 Kilowatts/month and the average cost was \$17.39 per site.
 - (c) I have no figures on the average usage in the individually metered section. Florida Power should furnish that data.

5. (a) I do not know of any conservation programs available from Florida Power Corp. for tenants of this park using sub-meters on the master meter. Programs that would add insulation to any portion of these units would be obviated by the method of construction. These units are factory built on production lines, encased in metal or fiberglass, and have no additional space in the walls or ceilings to install insulation. The best conservation program has been the

installation of the sub-meters as it has reduced the overall electrical usage in the park.

(b) The load management devices installed by Florida Power Corp. due not apply because of the tenants failure to use minimum required kilowatts for this installation.

(c) By virtue of size (400 square feet or less), all tenants are basically conserving now, especially in those units using propane gas for heating, cooking and water heating, or some mixture thereof.

7. (a) See 6(a) above.

(b) To my knowledge, only one unit (site 170 - Bartell) had his central air conditioner and hot water heater controlled by load management devices installed by Florida Power. The unit was crippled and removed because Mr. Bartell did not use enough kilowatt-hours to qualify. Dates of use are not available, but crippling evidence of Florida Power unit and wiring are noticeable in the trailer.

8. When the park was originally designed and approved for construction in 1972, it was the intention of Pinellas County to extend sewage lines into this area so that Westwind Mobile Home Park and Dunedin Beach Campground could hook onto them. This was scheduled for 1973. We had an agreement with Westwind to share their sewage facility if they built it on our property. This was to be a temporary system that would handle their park and the 123 sites we built in 1972. When we applied for the permits in 1973 to finish the remaining 120 sites we found that the county sewage system was not going to be completed as scheduled. We then had to add another sewage treatment plant and two more percolation ponds to support the additional 72 sites we could build. (drawing attached) I suppose that in the view of those who are not familiar with RV parks, they could say we could have built sites 188 through 207, but that would have left us with a dead end road, which is not tolerated in a RV park. It therefore became unfeasible at that time to proceed with those sites. The park owner had no control over these circumstances, and remedial action was in the hands of Pinellas County. When the county sewage system was installed in 1981, we immediately connected, dismantled our private sewage system and began construction of the 38 sites in question. It should be noted that we anxiously awaited the completion of the county sewage system as we were being denied the income from these sites.

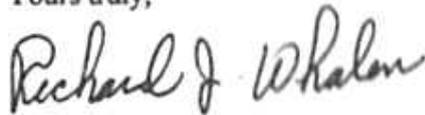
9. The estimate to install 38 individual sub-meters is \$1140.00

10. All 233 sites have meters on them. 195 have sub-meters (owned by the park) and 38 have Florida Power meters.

11. I will assume all costs incurred by Florida Power for the removal of their meters and wiring changes for the 38 sites in question. I also assume all responsibility for the cost of installing my sub-meters on those sites.

In conclusion, I feel that Mr. Bartell and I have provided the evidence that should corroborate the 38 petitioner's request to waive Rule 25-6.049. In addition, the requirements of the underlying statute 120.542 (Variances and Waivers) will be satisfied and the negative and unintentional results of the rule application nullified.

Yours truly,



Richard J. Whalen, Owner

Attachments (4)

Cc: Ms. Julia L. Johnson, Chairman
Florida Public Service Commission

Mr. Joseph Richardson, President and CEO
Florida Power Corporation

Mr. Jack Shreve, Esquire
Office of Public Counsel

Mr. James McGee, FPC Counsel
Florida Power Corporation

Mr. Joseph Jenkins, Director
Florida Public Service Commission, Electric & Gas Division

Ms. Connie Kummer, Chief - Bureau of Electric Regulation
Florida Public Service Commission

Ms. Kay Flynn, RAR
Florida Public Service Commission

Mr. Earle C. Bartell
Dunedin Beach Campground