



LEWIS, LONGMAN & WALKER, P.A.
ATTORNEYS AT LAW

Reply To: Tallahassee

August 11, 2006

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oaks Blvd.
Tallahassee, FL 32399-0850

Re: Docket Nos. 060172-EU and 060173-EU
Rule 25-6.115
Facility Charges for Conversion of Existing Overhead Investor-owned Distribution
Facilities

Dear Ms. Bayo:

Enclosed for filing are the initial Comments of the City of Fort Lauderdale concerning
Rule No. 25-6.115. Should you have any questions or need additional information, please do not
hesitate to contact me.

Sincerely,

Linda C. Cox

Enclosure

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Rule No. 25-6.115) Docket Nos. 060172-EU and
Facility Charges for Conversion) 060173-EU
Of Existing Overhead Investor-)
Owned Distribution Facilities)
_____)

**INITIAL COMMENTS OF THE CITY OF FORT LAUDERDALE CONCERNING
RULE NO. 25-6.115**

The City of Fort Lauderdale submits the following Initial Comments concerning Rule 25-6.115, Facility Charges for Conversion of Existing Overhead Investor-Owned Distribution Facilities:

A. Staff of the City of Fort Lauderdale is concerned that the proposed wording of the rule is open to the interpretation that undergrounded facilities paid for by parties other than an investor owned utility [IOU], [eg a municipality or its residents] would automatically be owned by the IOU. City staff is seeking clarification of this issue and confirmation as to whether the above interpretation is correct. However, nothing in this comment should be construed as meaning that any decision has been taken by the City Commission that future undergrounded facilities should be in the ownership of organizations other than the IOU. City's staff concern at this point is to ensure that ownership options for underground facilities are left open.

Respectfully submitted this 11th day of August, 2006.



Linda C. Cox