

STATE OF FLORIDA  
FLORIDA HOUSING FINANCE CORPORATION

FHFC CASE NO. 2013-025VW  
APPLICATION NO. 2011-126C

LULAV SQUARE APARTMENTS  
LIMITED PARTNERSHIP,

Petitioner

vs.

FLORIDA HOUSING FINANCE  
CORPORATION,

Respondent.

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FINANCE CORPORATION

**PETITION FOR WAIVER OF SECTION III(B)(1)(a) AND  
SECTION III(B)(1)(b) OF INSTRUCTIONS AND CHAPTER 67-48**

Petitioner, LULAV SQUARE APARTMENTS LIMITED PARTNERSHIP, a Florida limited partnership ("Petitioner"), hereby petitions Respondent, FLORIDA HOUSING FINANCE CORPORATION ("Florida Housing") for a waiver of: (i) the requirement to provide air conditioning systems with a SEER rating of 14 in the units of the Development (as defined below), and (ii) the requirement to provide a full-size range in the kitchen of those units located in the Development. *See* Universal Application Instructions, Housing Credit Program, Part III, Section B(1)(a) ("Rule B(1)(a)") and Part III, Section B(1)(b) ("Rule B(1)(b)") (the "Instructions") and Chapter 67-48, Florida Administrative Code.

Pursuant to Section 120.542, Florida Statutes, and Rule 28-104.002, Florida Administrative Code, Petitioner requests a waiver of (i) Rule B(1)(a) to allow for the use of EER (as opposed to SEER) 12.9 split air conditioning systems ("Alternative A/C System") in lieu of air conditioning systems with an SEER rating of 14 ("Required A/C System") in the redeveloped units of the Development, and (ii) Rule B(1)(b) to allow for the use of a smaller 20-inch wide

range ("Alternative Range") in lieu of a full-sized range ("Required Range") in the redeveloped units of the Development.

### **THE PETITIONER**

1. The address, telephone number, and facsimile number for Petitioner and its qualified representative are:

Lulav Square Apartments Limited Partnership  
Attention: Mr. Don Paxton  
2206 Jo An Drive  
Sarasota, Florida 34231  
Telephone: 941-929-1270 Ext. 110  
Facsimile: 9941-929-1271  
Email: [dpaxton@beneficialcom.com](mailto:dpaxton@beneficialcom.com)

2. The address, telephone number, facsimile number and e-mail address of Petitioner's counsel is:

David F. Leon, L.L.C.  
Broad and Cassel  
390 N. Orange Avenue, Suite 1400  
Orlando, FL 32801  
Telephone: (407) 839-4200  
Facsimile: (407) 425-8377  
Email: [dleon@broadandcassel.com](mailto:dleon@broadandcassel.com)

3. In 2011, Petitioner applied for low-income housing tax credits from Florida Housing pursuant to the 2011 Universal Application Cycle. *See* Application No. 2011-126C. The Universal Application package has been adopted and incorporated into Chapter 67-48 by Rule 67-48.004(1)(a), F.A.C. (2011). Petitioner received an allocation of low income housing tax credits from Florida Housing on March 15, 2013.

4. Petitioner has closed on the financing and housing credit syndication which will provide funds for the renovation of 140 units intended to serve low-income persons in Miami-Dade County, Florida (the "Development").

5. The waiver being sought is permanent in nature.

6. The requested waiver will not adversely affect the Development; however, a denial of this Petition would result in:

- a. substantial economic hardship to Petitioner by requiring (i) new electrical panels to be installed, (ii) a significant redesign of the kitchens of the Development, (iii) the use of less efficient air conditioning systems due to the inapplicability of the SEER standard to air conditioning systems of this size;
- b. deprivation of the residents in the Development of a workable kitchen with proper counter space;
- c. deprivation of Miami-Dade County of essential affordable housing units constructed in a timely manner;
- d. violation of the principles of fairness.<sup>1</sup> Section 120.542(2), Florida Statutes.

**THE RULE FROM WHICH WAIVER IS REQUESTED  
AND STATUTE IMPLEMENTED BY THE RULE**

7. Petitioner requests a waiver of Part III, Section B(1)(a) of the Instructions, that provides as follows:

***Part III. Proposed Development ...***

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<sup>1</sup> "Principles of Fairness" are violated when literal application of a rule affects a particular person in a manner significantly different from the way it affects other similarly situated persons who are subject to the rule. Section 120.542, Florida Statutes.

*B. Construction Features and Amenities ...*

*1. Required General Features and Amenities for All Developments (Threshold) ...*

*a. All Units in ALL Developments: ...*

*- Air conditioning with a minimum SEER rating of 14 (excluding building with central chiller system). Window air conditioning units are not allowed; however, through-wall air conditioning units with a minimum EER rating of 10 are permissible for rehabilitation units.*

8. Petitioner requests a waiver of Part III, Section B(1)(b) of the Instructions, that provides as follows:

*Part III. Proposed Development ...*

*B. Construction Features and Amenities ...*

*1. Required General Features and Amenities for All Developments (Threshold) ...*

*b. All Units in ALL Developments Except SRO: ...*

*- Full-size range, oven and Energy Star qualified refrigerator in all units.*

**JUSTIFICATION FOR REQUESTED WAIVER**

9. Under Section 120.542(1), Florida Statutes, and Chapter 28-104, Florida Administrative Code, Florida Housing has the authority to grant waivers to its rule requirements when strict application of the rules would lead to unreasonable, unfair and unintended consequences, in particular instances. Waivers shall be granted when the person who is subject to the Rule demonstrates that the application of the rule would: (1) create a substantial hardship

or violate principles of fairness,<sup>2</sup> and (2) the purpose of the underlying statute has been or will be achieved by other means by the person. Section 120.542(2), Florida Statutes (2012).

10. In this instance, Petitioner meets the standards for a waiver of Rule B(1)(a) and Rule B(1)(b).

11. Among other sections of the Florida Housing Finance Corporation Act, Rule B(1)(a) and Rule B(1)(b) implements Section 420.5089, Florida Statutes, the statute that created the HOME Program.

12. Pursuant to Rule B(1)(a), air conditioning systems with a SEER rating of 14 are required in all units within all developments receiving funding in the 2011 Universal Application Cycle. However, the Alternative A/C System, being a unit greater than 5 tons does not have a SEER rating. Such systems are rated in EER or IEER rather than rated in SEER. The Energy Code Minimums for a 360,000 MBH/H unit has an EER of 10.0, or an IEER of 10.1. The Alternative A/C System actually "exceeds FHFC commercial requirement for 'central chiller A/C system based on size >135-240 KBtuh: 11.0EER/11.5 IPLV' and also the FHFC requirement for 'in-unit conditioning: minimum 14 SEER'". See letter from the mechanical engineer attached hereto at Exhibit "A" confirming same. A copy of the specifications with tonnage and efficiency rating for the Alternative A/C System is attached hereto as Exhibit "B".

13. The Alternative A/C System significantly exceeds the code minimum, is the most efficient unit available for the particular design concept and is more than adequate for the residents of the units. Use of the Alternative A/C System will alleviate the need for substantial

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<sup>2</sup> "Substantial hardship" means a demonstrated economic, technological, legal or other type of hardship to the person requesting the variance or waiver. "Principles of Fairness" are violated when literal application of a rule affects a particular person in a manner significantly different from the way it affects other similarly situated persons who are subject to the Rule. Section 120.542(2), Florida Statutes.

revisions to the plans for the Development's renovations and thereby insure timely delivery of the renovated units for residential occupancy.

14. Pursuant to Rule B(1)(b), a full-size range is required in all units within all developments receiving funding in the 2011 Universal Application Cycle. However, the electrical consultant for the Development has concluded that, if the Required Range were used in the units, the kitchen would not be as usable as if the Alternate Range were installed, because (i) the kitchen area within the rehabilitated units did not allow for a range the size of the Required Range; (ii) the use of the Alternative Range will allow for a functioning kitchen with increased usable kitchen countertop space; and (iii) the Required Range would increase the electrical load in each unit by as much as ten percent (10%), thereby requiring a new electrical panel and other electrical upgrades in each unit which is neither feasible nor necessary as a practical matter. Further, the Alternative Range consists of four burners and an oven of sufficient capacity to serve the units which will not be occupied by more than two (2) persons. A copy of the specifications for the Alternative Range is attached hereto as Exhibit "C".

15. Like the Required Range, the Alternative Range contains a full oven and four burners which is more than adequate for the residents of the units. Use of the Alternative Range will alleviate the need for substantial revisions to the plans for the Development's renovations and thereby insure timely delivery of the renovated units for residential occupancy.

16. Because the use of the Required A/C Systems and the Required Ranges are requirements for all units in the Development, a waiver is necessary to prevent the Petitioner from being in default under Rule B(1)(a) and Rule B(1)(b) respectively.

## CONCLUSION

17. Controlling statutes and Florida Housing rules are designed to allow the flexibility necessary to provide relief from rule requirements when strict application, in particular circumstances, would lead to unreasonable, unfair or unintended results. Waivers should be granted when the applicant subject to the rule demonstrates that strict application would: (a) create a substantial hardship or violate principles of fairness; and (b) the purposes of the underlying Statute has been or will be achieved by other means. Section 120.542(2), Florida Statutes.

18. The requested waiver will not adversely impact the Development or Florida Housing and will ensure that 140 affordable housing units will be available for the target population in Miami-Dade County, Florida.

19. A denial of the requested waiver of Rule B(1)(a) could result in a substantial hardship for Petitioner, which would be obligated to use less efficient air conditioning systems due to the inapplicability of the SEER standard to the Alternative A/C Systems. In addition, a denial of the requested waiver of Rule B(1)(b) could result in a substantial hardship for Petitioner, which would be unable to provide usable, accessible kitchen with adequate countertop space for its residents, or would be required to revise the kitchen layout and further to make significant electrical upgrades resulting in delay in providing those renovated units for occupancy.

20. The requested waivers serve the purposes of Section 420.5099, Florida Statutes (2012), and the Florida Housing Finance Corporation Act (the "Act"), as a whole, because one of

the primary goal is to facilitate the availability of decent, safe and sanitary housing in the State of Florida to low-income persons and households by ensuring:

... the maximum use of available tax credits in order to encourage development of low-income housing in the state, taking into consideration the timeliness of the application, the location of the proposed housing project, the relative need in the area for low-income housing and the availability of such housing, the economic feasibility of the project, and the ability of the applicant to proceed to completion of the project in the calendar year for which the credit is sought.

Section 420.5099(2), Florida Statutes (2012).

21. Finally, by granting the requested waiver, Florida Housing would recognize the economic realities and principles of fundamental fairness in the development of affordable rental housing of the elderly. This recognition would promote participation by experienced developer entities in meeting the purpose of the Act through rehabilitation of projects in an economical and efficient manner, as well as to provide practical features and amenities within residential units developed for low-income residents.

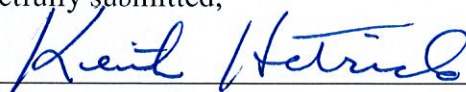
22. Should Florida Housing require additional information, Petitioner is available to answer questions and to provide all information necessary for consideration of its Petition for Waiver of Part III, Section B(1)(a) and Section B(1)(b) of the Instructions and Chapter 67-48.

WHEREFORE, Petitioner respectfully requests the following:

- A. Grant the Petition and all relief requested herein;
- B. Waive Rule B(1)(a)'s requirement for the use of air conditioning systems with a SEER rating of 14 and allow Petitioner to use split air conditioning systems with an EER rating of 12.9;
- C. Waive Rule B(1)(b)'s requirement for the use of full size ranges and allow Petitioner to use the 20-inch ranges in the units in the Development; and
- D. Grant such further relief as may be deemed appropriate.



Respectfully submitted,



Keith Hetrick, Esq.

Fla. Bar No. 564168

David Leon, Esq.

Fla. Bar No. 53929

BROAD AND CASSEL

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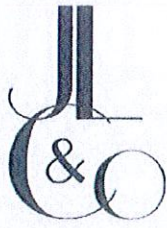
COUNSEL FOR PETITIONER

CERTIFICATE OF SERVICE

The original Petition is being served by hand delivery, for filing with the Corporation Clerk for the Florida Housing Finance Corporation, 227 North Bronough Street, Tallahassee, Florida 32301, with copies served by hand delivery on the Joint Administrative Procedures Committee, 680 Pepper Building, 111 W. Madison Street, Tallahassee, Florida 32399-1400, this 27 day of August, 2013.

By: Keith Hetrick  
Keith Hetrick, Esq.

Exhibit "A"



Joseph, Lawrence & Co  
Consulting Engineers

August 23rd, 2013

Re: FORUM Architecture & Interior Design, Inc.  
745 Orienta Avenue, Suite 1121  
Altamonte Springs, FL 32701  
Building Permit Number: BLD2013-04909  
JLC Project Number: 13.0064.00

**Subject: Lulav Square Senior Apartments**

Re: FHFC Plan Review Comments

To whom it may concern:

Joseph, Lawrence & Co., is in receipt of the Due Diligence Associates review comments August 5th, 2013 for the Lulav Square Senior Apartments project. We have reviewed the comments with respect to our disciplines and have the following responses:

**Comment:** Plans indicate air conditioning systems with EER 12.2 split systems, although a SEER rating of 14 is required.

**Response:** Units greater than 5 tons are rated in EER or IEER, not SEER. The specified system is a 14 ton common condensing unit with a 12.9 EER rating and 19.1 IEER rating. This efficiency rating exceeds FHFC commercial requirement for "central chiller AC system based on size >135-240 KBtuh: 11.0EER/11.5 IPLV" and also the FHFC requirement for "in-unit conditioning: minimum 14 SEER." Finally, the specified system significantly exceeds state Energy Code Minimums for a 360,000 MBH/H unit are EER=10.0 "OR" IEER=10.1.

If there are any additional questions or comments, please feel free to contact us.

Sincerely,

Joseph, Lawrence & Co.

Adam Joseph Barney, P.E.  
Principal

**Joseph, Lawrence & Co. LLC**

Exhibit "B"

**CITYMULTI®** Outdoor Unit: **14-TON PURY-P168TSKMU-A (-BS)** **MITSUBISHI ELECTRIC**  
 (Consists of One PURY-P96TKMU-A (-BS), One PURY-P72TKMU-A (-BS), and One CMY-R100CBK2 Twinning Kit)

Job Name: Lulav Square Apartments

Schedule Reference: Sheet M15.61

Date:

**OUTDOOR VRF HEAT PUMP WITH HEAT RECOVERY SYSTEM FEATURES**

- INVERTER-driven compressor
- Air-source, simultaneous cooling and heating
- Long line lengths - for details see Engineering Manual
- Connects to CITY MULTI indoor units
- Controlled via CITY MULTI Controls Network

**UNIT OPTION**

- Standard Model.....PURY-P168TSKMU-A
- Sea Coast (BS) Model.....PURY-P168TSKMU-A-BS

**OPTIONAL PARTS**

- Twinning Kit.....CMY-R100CBK2
- T-Branch Joint (≤ 72,000 Btu/h).....CMY-Y102SS-G2
- T-Branch Joint (73,000-144,000 Btu/h).....CMY-Y102LS-G2
- Branch Joint (T-Branch: 145,000-234,000 Btu/h).....CMY-Y202S-G2
- Joint Adapter (Port Connector > 54,000 Btu/h).....CMY-R160C-J
- Main BC Controller.....CMB-P108/1010/1013/1016NU-GA/1016NU-HA
- Sub BC Controller.....CMB-P104/108NU-GB/1016NU-HB
- Low Ambient Kit .. Ambient Kit Submittal of the modules and
- \* Twinning Kit is neces included in the outdoor

168,000 btu/h /  
12,000 btu/h/ton =  
14 tons cooling per  
system (per floor)

Specifications		System		Module 2	
Unit Type		PURY-P168TSKMU-A (-BS)	PUF	P72TKMU-A (-BS)	
Nominal Cooling Capacity	Btu/h	168,000			72,000
Nominal Heating Capacity	Btu/h	188,000		108,000	80,000
Operating Temperature Range	Cooling (Outdoor) *1	Refer to Module Data	23~115° F (-5~46° C) DB		
	Heating (Outdoor)		-4~60° F (-20~15.5° C) WB		
External Dimensions (H x W x D)	In. / mm	Refer to Module Data	64-31/32 x 48-1/16 x 29-5/32 1,650 x 1,220 x 740	64-31/32 x 48-1/16 x 29-5/32 1,650 x 1,220 x 740	
Net Weight	Lbs. / kg	1,041 (472)	538 (244)	503 (228)	
External Finish		Refer to Module Data	Pre-coated galvanized steel sheet		
Electrical Power Requirements	Voltage, Phase, Hertz	Refer to Module Data**	208 / 230V, 3-Phase, 60Hz		
Cooling Power Input	kW	12.8	Refer to System Data		
Heating Power Input	kW	14.91			
Cooling Current (208/230V)	R.L.A.	39.4-35.7			
Heating Current (208/230V)	R.L.A.	45.9-41.5			
Minimum Circuit Ampacity (MCA)	A	Refer to Module Data**	34 / 31	23 / 21	
Recommended Fuse/Breaker Size	A	Refer to Module Data**	35	25	
Maximum Fuse Size	A	Refer to Module Data**	40	30	
<b>Piping Diameter</b>					
From Twinning Kit to Indoor Units (Braze) (In. / mm)	Liquid (High Pressure)	7/8 (22.2) Braze	Refer to System Data		
	Gas (Low Pressure)	1-1/8 (28.58) Braze			
Max. Total Refrigerant Line Length	Ft.	1,969	Refer to System Data		
Max. Refrigerant Line Length (Between ODU & IDU)	Ft.	541			
Max. Control Wiring Length	Ft.	1,650			
Indoor Unit	Total Capacity	50~150% of ODUs	Refer to System Data		
	Model / Quantity	P06~P96/1~42	Refer to System Data		
Sound Pressure Level	dB(A)	61	Refer to System Data		
<b>Fan</b>					
Type x Quantity		Refer to Module Data	Propeller fan x 1	Propeller fan x 1	
Airflow Rate	CFM		6,200	6,200	
External Static Pressure	In. WG (Pa)	Refer to Module Data	Selectable; 0, 0.12 or 0.24" WG; factory set to 0" WG.		
Compressor Operating Range		7% to 100%	Refer to System Data		
Compressor Type x Quantity		Refer to Module Data	Inverter-driven Scroll Hermetic x 1	Inverter-driven Scroll Hermetic x 1	
Refrigerant		Refer to Module Data	R410A x 26 lbs + 1 oz (11.8 kg)	R410A x 26 lbs + 1 oz (11.8 kg)	
Protection Devices	High Pressure	Refer to Module Data	High pressure sensor, High pressure switch at 4.15 MPa (601 psi)	High pressure sensor, High pressure switch at 4.15 MPa (601 psi)	
	Inverter Circuit (Comp. / Fan)		Over-current protection	Over-current protection	
	Fan Motor		Thermal switch	Thermal switch	
AHRI Ratings (Ducted/Non-Ducted)	EER	12.1 / 12.9	EER is efficiency rating for full-on cooling demand, IEER is calculated rating for typical likely demand across all units		
	IEER	19.4 / 19.1			
	COP	3.63 / 3.52			
Simultaneous Rating (Ducted/Non-Ducted)	SCHE *2	19.96 / 22.60			
Blue Fin Anti-corrosion Protection: Cellulose- and polyurethane-resin coating treatment applied to condenser coil Standard: ≥1µm thick; Salt Spray Test Method - no unusual rust development to 480 hours. Sea Coast (BS): ≥1µm thick; Salt Spray Test Method - no unusual rust development to 960 hours.					

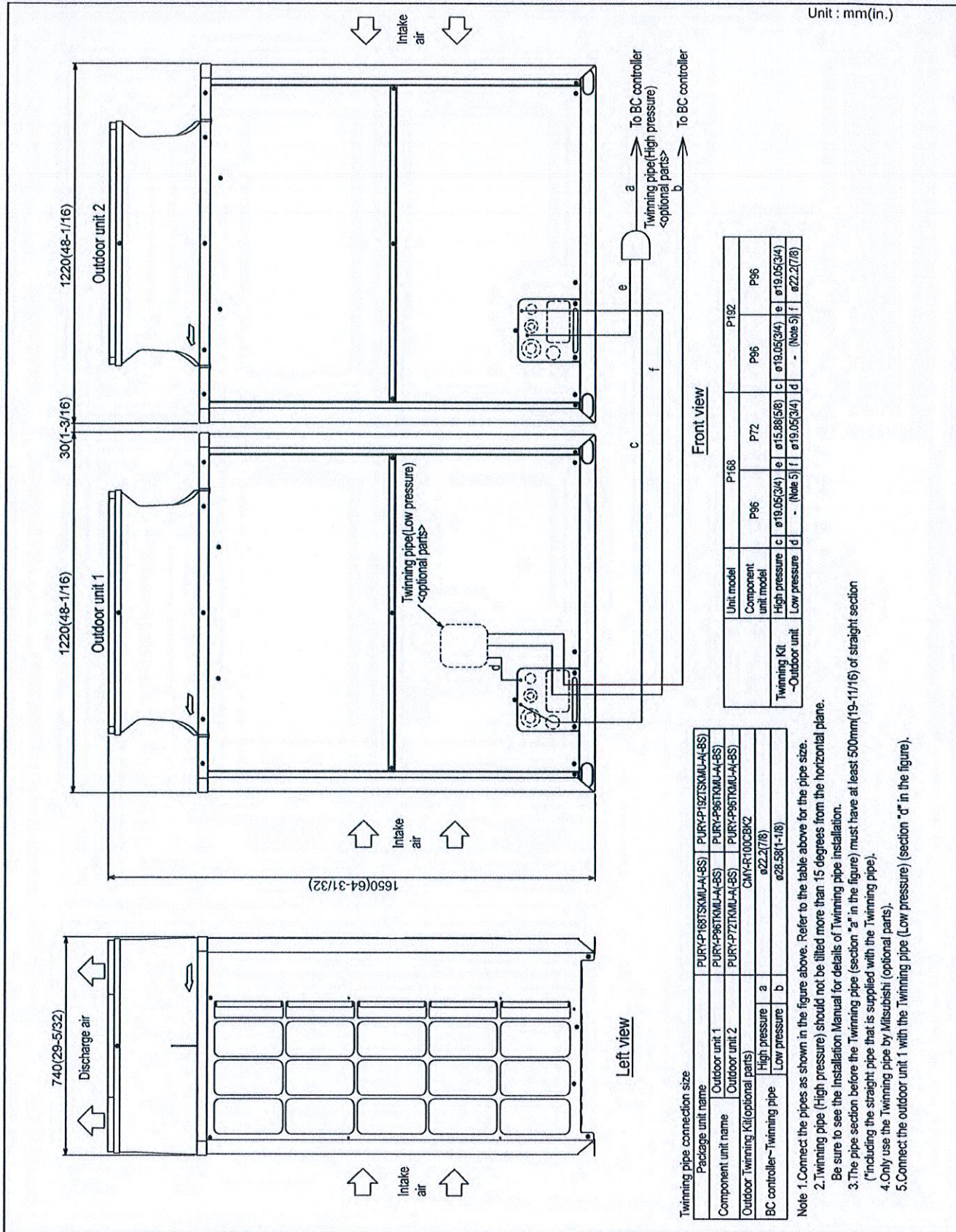
**NOTES:**

- \*1. For details on extended cooling operation range down to -10° F DB, see Low Ambient Kit Submittal.
- \*2. Simultaneous Cooling and Heating Efficiency

\*\* Each individual module requires a separate electrical connection. Refer to electrical data for each individual module.

# Outdoor Unit: PURY-P168TSKMU-A (-BS) – DIMENSIONS

Unit : mm(in.)



Front view

Unit model	P168	P192
Component unit model	P96	P96
High pressure	c ø19.05(3/4)	c ø19.05(3/4)
Low pressure	d - (Note 5)	d ø19.05(3/4)
Twinning Kit -Outdoor unit	e ø22.2(7/8)	e ø19.05(3/4)
	f - (Note 5)	f ø22.2(7/8)

Twinning pipe connection size

Package unit name	PURY-P168TSKMU-A(-BS)	PURY-P192TSKMU-A(-BS)
Outdoor unit 1	PURY-P96TKMU-A(-BS)	PURY-P96TKMU-A(-BS)
Outdoor unit 2	PURY-P72TKMU-A(-BS)	PURY-P96TKMU-A(-BS)
Outdoor Twinning Kit(optional parts)	CMY-R100CBK2	
BC controller-Twinning pipe	ø22.2(7/8)	
High pressure	a	
Low pressure	b	

- Note 1. Connect the pipes as shown in the figure above. Refer to the table above for the pipe size.  
 2. Twinning pipe (High pressure) should not be tilted more than 15 degrees from the horizontal plane.  
 Be sure to see the Installation Manual for details of Twinning pipe installation.  
 3. The pipe section before the Twinning pipe (section "a" in the figure) must have at least 500mm(19-11/16) of straight section (\*including the straight pipe that is supplied with the Twinning pipe).  
 4. Only use the Twinning pipe by Mitsubishi (optional parts).  
 5. Connect the outdoor unit 1 with the Twinning pipe (Low pressure) (section "d" in the figure).

# Model: PURY-P96TKMU-A (-BS) – DIMENSIONS

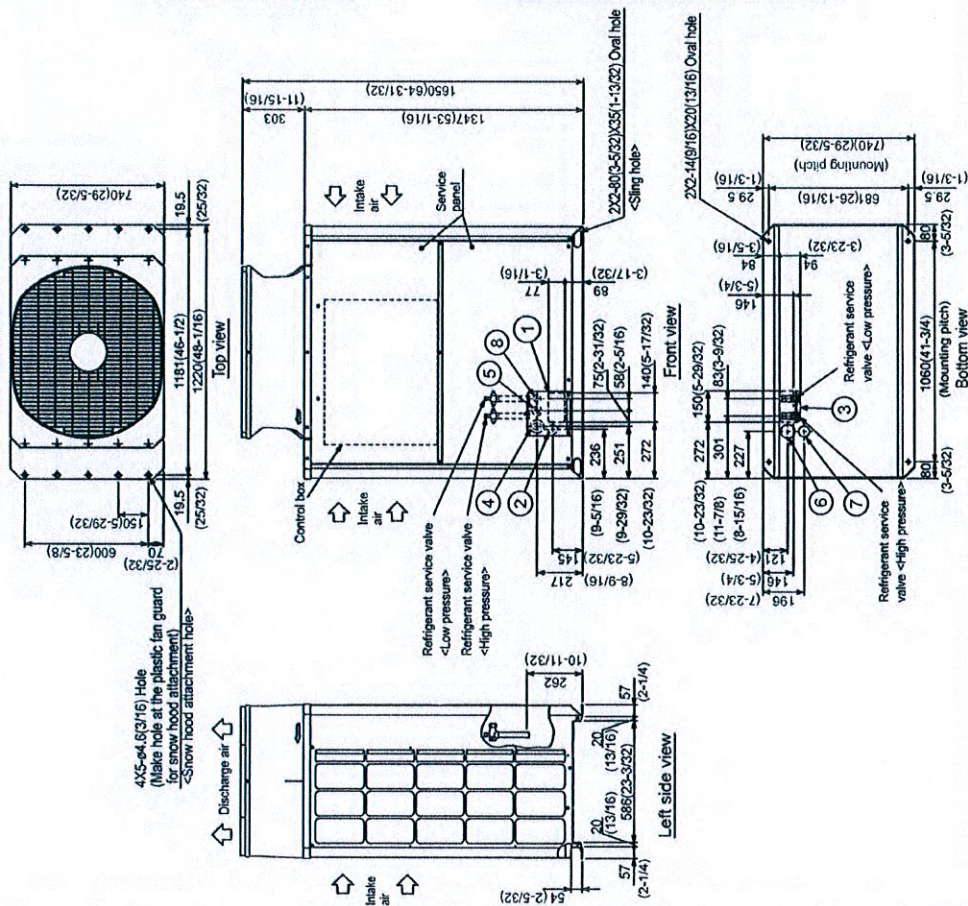
Unit : mm(in.)

Note 1 Please refer to the engineering manual for information regarding necessary spacing around the unit and foundation work. Outdoor unit must be mounted at least 12" off the ground or 12" above the highest average snow depth, whichever is greater.  
 2. At brazing of pipes, wrap the refrigerant service valve with wet cloth and keep the temperature of refrigerant service valve under 120°C(248°F).

Connecting pipe specifications

Model	Refrigerant pipe		Service valve	
	High pressure	Low pressure	High pressure	Low pressure
PURY-P96TKMU	φ12.08 Brazed (3/8)	φ10.05 Brazed (3/4)	φ25.4 (1)	φ25.4 (1)
PURY-P96TKMU	φ16.05 Brazed (3/4)	φ22.2 Brazed (7/8)	φ25.4 (1)	φ25.4 (1)

\*1 Use the pipe joint (field supply) and connect to the refrigerant service valve piping.



NO.	Usage	Specifications
①	Front through hole	140 × 77 Knockout hole (6-1/8)(3-1/16)
②	Front through hole (Uses when winning (1) pipe and (2) pipe is mounted)	φ45 Knockout hole (1-25/32)
③	Bottom through hole	150 × 64 Knockout hole (6-29/32)(3-25/32)
④	Front through hole	φ67.7 or φ4.5 Knockout hole (2-15/32)(1-3/8)
⑤	Front through hole	φ43.7 or φ2.2 Knockout hole (1-3/4)(7/8)
⑥	Bottom through hole	φ65 Knockout hole (2-3/16)
⑦	Bottom through hole	φ62 Knockout hole (2-1/16)
⑧	Front through hole	φ34 Knockout hole (1-1/32)



# Model: PURY-P72TKMU-A (-BS) – DIMENSIONS

Unit : mm(in.)

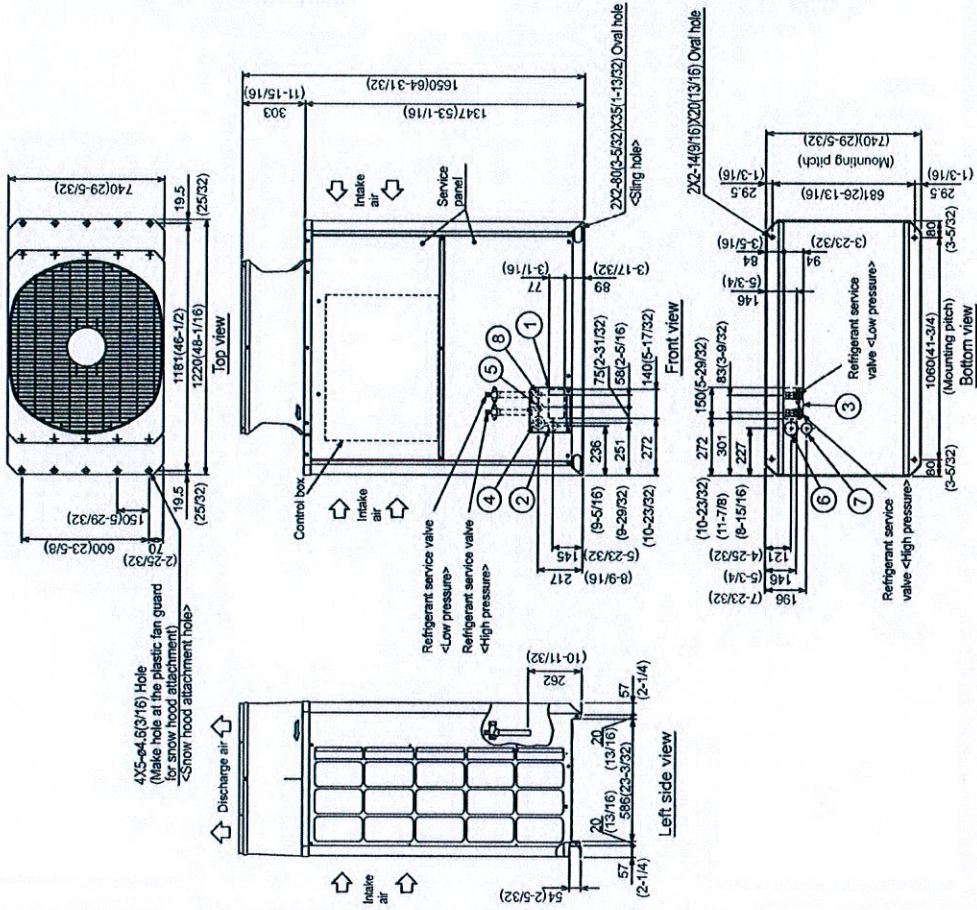
Note 1. Please refer to the engineering manual for information regarding necessary spacing around the unit and foundation work. Outdoor unit must be mounted at least 12" off the ground or 12" above the highest average snow depth, whichever is greater.  
 2. At brazing of pipes, wrap the refrigerant service valve with wet cloth and keep the temperature of refrigerant service valve under 120°C(248°F).

Connecting pipe specifications

Model	Refrigerant pipe			Diameter	
	High pressure	Low pressure	Service valve	High pressure	Low pressure
PURY-P72TKMU	φ15.88 Braze (5/8) *1	φ19.05 Braze (3/4) *1	φ25.4 (1)	φ25.4 (1)	φ25.4 (1)
PURY-P80TKMU	φ15.05 Braze (3/4) *1	φ22.2 Braze (7/8) *1	φ25.4 (1)	φ25.4 (1)	φ25.4 (1)

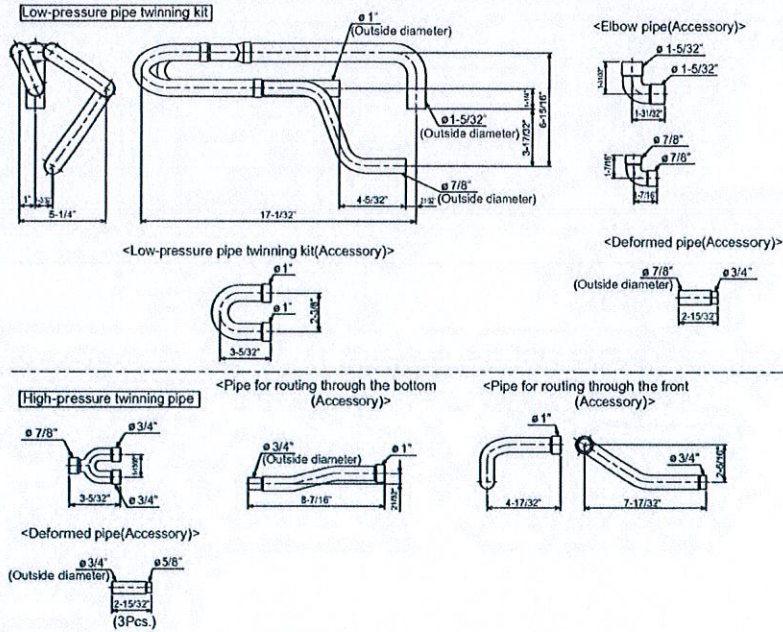
\*1. Use the pipe joint(field supply) and connect to the refrigerant service valve piping.

NO.	Usage	Specifications
①	Front through hole	140 x 77 Knockout hole (5-17/32)(3-1/8)
②	Front through hole (Uses when wiring kit (optional part) is mounted.)	φ45 Knockout hole (1-25/32)
③	Bottom through hole	150 x 94 Knockout hole (5-29/32)(3-2/32)
④	Front through hole	φ27 or φ34.5 Knockout hole (2-15/32)(1-3/8)
⑤	Front through hole	φ43.7 or φ22.2 Knockout hole (1-3/4)(7/8)
⑥	Bottom through hole	φ65 Knockout hole (2-9/16)
⑦	Bottom through hole	φ52 Knockout hole (2-1/8)
⑧	Front through hole	φ34 Knockout hole (1-1/32)



# Twinning Kit: CMY-R100CBK2

CMY-R100CBK2



Ref: CMY\_R100VBK\_EXD\_EUDB\_SI

Notes:



**Intertek**



1340 Satellite Boulevard  
Suwanee, GA 30024  
Tele: 678-376-2900 • Fax: 800-889-9904  
Toll Free: 800-433-4822  
www.mehvac.com

FORM# PURY-P168TSKMU-A (BS) - 201306  
Specifications are subject to change without notice.  
© 2013 Mitsubishi Electric US, Inc.

Exhibit "C"

# Hotpoint® 20" Electric Free-Standing Range

# HOTPOINT

Model# RA720KWH



## FEATURES

Cooking Technology	Traditional
Cooktop Burner Type	Coil
Cooktop Surface	Porcelain-Enamel
	Lift-Up
Control Location	Upfront
6" Heating Element(s)	3 Plug-In
8" Heating Element (s)	1 Plug-In
Removable One-Piece Drip Bowls	Chrome
Broiler Pan and Grid	Yes
Heating Element "ON" Indicator Light	Yes
Leveling System	Easy Level System
Oven Cleaning Type	Standard Clean
Oven Control Features	Oven "ON" Light
Oven Rack Features	2 Oven Racks

- Coil heating elements - Provides consistent and even heat on the cooktop with a plug-in element that is removable for easy cleaning
- Chrome Drip Bowls - Contain spills and remove for easy cleaning
- Lift-Up Cooktop - Cooktop lifts up for easy access to porcelain-enameled subtop
- Two Oven Racks - Feature a durable construction to help accommodate any size or type of cookware
- Broiler Pan With Grid - Convenient broiler pan can be used when broiling for crisping and browning

Have more questions? Please contact 1-800-626-2005

## Hotpoint® 20" Electric Free-Standing Range

**HOTPOINT**

Model# RA720KWH

**APPROXIMATE DIMENSIONS (HxDxW)**

- 40 in x 26 1/2 in x 20 in

**CAPACITY**

- Total Capacity (cubic feet) 2.4 cu ft

**Claims & Certifications**

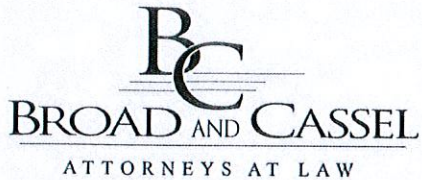
- ADA Compliant

**WARRANTY**

- Parts Warranty - Limited 1-year entire appliance
- Labor Warranty - Limited 1-year entire appliance
- Warranty Notes - For models produced on or after January 1, 2006

See written warranty for full details

Have more questions? Please contact 1-800-626-2005



390 NORTH ORANGE AVENUE  
SUITE 1400  
ORLANDO, FLORIDA 32801  
P.O. Box 4961 (32802-4961)  
TELEPHONE: 407.839.4200  
FACSIMILE: 407.425.8377  
www.broadandcassel.com

JACQUELINE S. BEST  
DIRECT LINE: (407) 839-4273  
DIRECT FACSIMILE: (407) 254-1207  
EMAIL: jbest@broadandcassel.com

August 27, 2013

**VIA COURIER**

Ms. Ashley Black  
Corporation Clerk  
Florida Housing Finance Corporation  
227 North Bronough Street, Suite 5000  
Tallahassee, Florida 32301

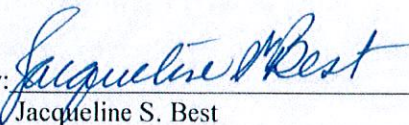
Re: **Lulav Square Apartments Limited Partnership**  
Petition for Rule Waiver  
Application No. 2011-126C

Dear Ms. Harrell:

Enclosed for filing is a Petition for Rule Waiver, submitted on behalf of Lulav Square Apartments Limited Partnership, for consideration by the Board at its next meeting. A duplicate copy has been delivered to the Joint Administrative Procedures Committee.

If you should you have any questions, please contact me.

BROAD AND CASSEL

By:   
Jacqueline S. Best

Enclosure

cc: Mr. Donald Paxton (dpaxton@beneficialcom.com)  
Ms. Candice Allbaugh (Candice.Allbaugh@floridahousing.org)  
Mr. Jade Grubbs (jade.grubbs@floridahousing.org)  
Mr. George Repity (gripity@amerinational.net)  
Ms. Kathleen O'Grady (kogrady@beneficialcom.com)  
(All via email without enclosure)

4830-0403-0997.1  
32054/0157  
08/27/2013