

Hong Wang

From: Crystal Card
Sent: Monday, February 23, 2015 9:47 AM
To: Carlotta Stauffer
Cc: Hong Wang
Subject: FW: Florida Senate - 2015 / CS for SB 288 / By the Committee on Communications, Energy, and Public / CS for SB 1034

Please see below.

Crystal Card
Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
850-413-6770

From: rsmith [mailto:rsmith@myacc.net]
Sent: Saturday, February 21, 2015 12:00 PM
To: Charlie Beck; Records Clerk
Cc: Office of Commissioner Patronis; Office Of Commissioner Edgar; Office of Commissioner Brisé; Office Of Commissioner Graham; Office of Commissioner Brown; 'Robert H. Smith '
Subject: FW: Florida Senate - 2015 / CS for SB 288 / By the Committee on Communications, Energy, and Public / CS for SB 1034

Dear Records Clerk,

I am sending this to afford that there is no "Ex parte communication at the commission" The pending legislation is very important and I wanted to make sure that I afforded Mr. Charlie Beck the courtesy of my comments below.

Please make sure that Mr. Beck receives this email.

Thanks,

Robert H. Smith

Dear Mr. Beck,

I hope that this gets delivered since it appears that Mr. Kiser has left or retired from the Florida Public Service Commission.

Thanks,

Robert H. Smith

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information is strictly prohibited, and the documents should be returned. In this regard, if you received this telecopy in error, please contact the sender by reply E-mail and destroy all copies of the original.

From: rsmith [<mailto:rsmith@myacc.net>]
Sent: Saturday, February 21, 2015 11:44 AM
To: 'SupremeCourt'; 'Public Information <publicinfo@flcourts.org>'; 'Governor Rick Scott'; 'Curt Kiser'; 'Kelly, JR'; 'Mcglathlin, Joseph'; 'Bill@billnelson.senate.gov'; 'Latvala.Jack.web@flsenate.gov'; 'Robert H. Smith '
Cc: 'president@whitehouse.gov'; 'vice_president@whitehouse.gov'; 'fellowsprogram@supremecourt.gov'; 'Lauren Jeffords <ljeffords@supremecourt.gov>'
Subject: Florida Senate - 2015 / CS for SB 288 / By the Committee on Communications, Energy, and Public / CS for SB 1034

Dear Florida Supreme Court, Mr. Nelson, Governor Scott and Office of Public Counsel and Mr. Latvala,

I am sending through my other email address since my Yahoo ISP appears to not be white listing my rpirb@yahoo.com email address. Do not know why?

I know it has been a long time but I am very busy working as a CFO/Controller at a healthcare company. Again, now that I have been working for a while I want to make sure that none of my comments has any impact on myself and/or well being of my family.

I listened to your speech that you have completed the other day in which you have indicated that everyone should get involved in politics to serve the public. When I received notice that the legislation below has been set forth I wanted to provide my comments since the previous ruling on the FPL rate case potentially did not serve the best interest of all parties with a legal interest. Since my time is limited, at this time I wanted to provide some public service as time permits.

I still reserve the right as a full party with a legal interest for any type of FPL proceeding and still reserve the right to comment on such legislation as it would pertain to my legal interests. I think that there has to be some clarification with regard to the definition of a "party" with any legislation that is being set forth for any new rules for the Florida Public Service Commission and/or Office of Public Counsel.

I have not looked at all the components i.e. SB 1034 etc....yet and as time permits I will fully take a look of what has been proposed for change.

I cannot stress the importance of a fully transparent and unbiased process for any type of legislation that is set forth or made part of State Law. I would exercise caution to make sure that any State legislation provides for full coverage by Federal Preemption to provide all parties with a legal interest to be fully afforded their due process rights.

Anyway , here are the comments but I wanted you to know that I am watching this closely since I was not happy with the lack of transparency with regard to the depreciation surplus over recovery being refunded as a non-cash amortization with the unbundling of other rate case proceedings in which there as approved cash rate increases. Also, there is still no talk of an "Excess Earnings" calculation to make sure at the rate increases are not carved out to provide for a cash increase in one proceeding and a non-cash refund in another. This includes any tax impacts with regard to any refund provided by a non-cash amortization to any Utility Cost of Service.

Considering that you have indicated that everyone should try and help with public service this is why I am keeping in the loop with regard to any potential legislation that might be made part of law through the legislature and signed into law by the Governor's Office.

Feel free to provide any comments since I feel that this is a very serious and important issue to all parties with a legal interest on any type of Utility rate matter in the State of Florida.

It has been a long time and hope everything is OK on your end.

Stay focused and work together.

Thanks,

Robert H. Smith

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Dear Mr. President and Justices,

It has been a long time and I felt that comments regarding the legislation below should be provided. I know that a ruling will come on the ACA case in March if I heard this correctly. I just want to make sure that everyone understands that unless large risk pools are utilized to help the control the increase in healthcare costs no legislation will work. Considering the Fraud issues that each State is experiencing there is an inherent problem of Cross State subsidization issues that have to be fully vetted out which would be in the best interests of the American people. Whatever plan survives this constant fight, it will have to ensure that there is equal access to healthcare and to provide for the equitable distribution of Federal/State dollars for any type of healthcare program (Medicare, Medicaid, Company based insurance, Managed Care insurance, Private pay insurance etc.) With the inherent problem with Medicaid and Medicare Fraud and the sheer magnitude of this problem any solution would have to provide for the use of large risk pools. I know that I have fully vetted this out during my unemployment but this is a very important ongoing issue that the country is facing that might have an impact on other programs.

Hopefully everything is OK on your end.

Stay focused and work together.

Thanks,

Robert H. Smith

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Florida Senate - 2015

CS for SB 288

By the Committee on Communications, Energy, and Public Utilities; and Senator Latvala

Rob Smith Comments:

The legislation below must include any type of electronic device communication(s) such as cell phones and any other electronic device that might provide the ability to communicate during the meeting, workshop, hearing, or proceeding at which a decision is made which concerns the rights or obligations of any person. If not, this can lead to Ex parte communications would be a violation of 350.042. If there is a break at any meeting, workshop, hearing, or proceeding and any type of electronic communication is conducted when they temporary stop of the such meeting, workshop, hearing, or proceeding this

might lead to Ex parte communications. The legislation must adhere to E discovery rules since there are very specific Federal regulations that might preempt State law.

(10) Each meeting, including an internal affairs meeting, workshop, hearing, or proceeding that is attended by two or more commissioners and each meeting, workshop, hearing, or proceeding at which a decision is made which concerns the rights or obligations of any person, shall be streamed live on the Internet, and a recorded copy of such meeting, workshop, hearing, or proceeding must be made available on the commission's web page.

Rob Smith Comments:

The legislation below must include the ability of the State Attorney General's office to oversee the findings and recommendations of the Governor and the Florida Public Service Commission Nominating Council. There must be a checks and balance approach to enforcement and compliance. If there is no checks and balance approach the possibility exists that a request to move an issue to a Federal venue might exist by "trial de novo" in which certain facts might have been omitted with regard to findings/recommendations.

98 (4) COMMISSION ON ETHICS.—The Commission on Ethics shall
99 accept and investigate any alleged violations of this section
100 pursuant to the procedures contained in ss. 112.322-112.3241.
101 The Commission on Ethics shall provide the Governor and the
102 Florida Public Service Commission Nominating Council with a
103 report of its findings and recommendations. The Governor is
104 authorized to enforce the findings and recommendations of the
105 Commission on Ethics, pursuant to part III of chapter 112. A
106 public service commissioner or a member of the Florida Public
107 Service Commission Nominating Council may request an advisory
108 opinion from the Commission on Ethics, pursuant to s.
109 112.322(3)(a), regarding the standards of conduct or
110 prohibitions set forth in this section and ss. 350.031, 350.04,
111 and 350.042.

350.042 Ex parte communications.—

(1) A commissioner should accord to every person who is

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117 legally interested in a proceeding, or the person's lawyer, full
118 right to be heard according to law, and, except as authorized by

Rob Smith Comments:

The legislation below must ensure that any type of correspondence that is being provided to the Commission provide for full transparency. No exceptions. For example if a party with a legal interest in the proceeding provides for testimony that might impact a final decision of the commission all types of communications and testimony must be made part of the public docket with a detailed description of such testimony/correspondence that might have an impact on the final decision and to provide full accountability of the full commission and its staff including the commissioners and General Counsel of the Commission. Considering the advent of "No Fear" legislation at the Federal Level if every person who has any type of legal interest in any type of matter set forth for review by the Commission is not fully afforded their right to be heard according to law, this can potentially can lead to a biased ruling by the Commission which might lead to circumstances that might lead to a "trial de novo" in a Federal Venue.

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117 legally interested in a proceeding, or the person's lawyer, full
118 right to be heard according to law, and, except as authorized by
119 law, shall neither initiate nor consider ex parte communications
120 concerning the merits, threat, or offer of reward in any
121 proceeding under s. 120.569 or s. 120.57 which is currently
122 pending before the commission or which he or she knows or
123 reasonably expects will be filed with the commission within 180
124 days after the date of any such communication, other than a
125 proceeding under s. 120.54 or s. 120.565, workshops, or internal
126 affairs meetings. An ~~No~~ individual may not shall discuss ex
127 parte with a commissioner the merits of any issue that he or she
128 knows will be filed with the commission within 180 ~~90~~ days. The
129 provisions of This subsection does shall not apply to commission
130 staff.

Rob Smith Comments:

The legislation below sets accountability for the reasoning of why certain rate making matters/ accounting matters before the Commission, Nominating Commission, Governor and State Attorney's Office would require the appropriate level of experience to rule on such matters. This criteria must be a benchmark for the process how a Commissioner is appointed to the Commission. No exceptions. Again, If there is any avenue in which such appointment does not provide a knowledge base that would be required to make an informed decision on such rate matters this can also lead to a "trial de novo" / Federal preemption issue in which a Federal venue might be needed to provide full protection for a party with a legal interest. Even though the Office of Public Counsel has been quasi appointed to protect the interests of citizens of the State for such rate making proceedings this would and should not prevent any party with a legal interest to move a ruling to a court of jurisdiction that would provide for Federal preemption in such matters to protect their legal interest according to law. This would include the SEC and NRC for any potential matter in which a shareholder and/or for safety issues would be needed to be moved to a Federal Venue to afford protection for any potential impact of any final decision made by the Commission, Nominating Commission, Governor and State Attorney General's office.

Based upon Freedom of information act any party with a legal interest should be afforded full transparency as afforded by Federal/State law. No exceptions. When a matter is brought forward to the Commission, Nominating Commission, Governor and State Attorney's office that might be of a public safety concern and/or that might be a matter of a potential violation of Federal law full transparency must be afforded and upheld. This must be an unbiased with no partiality to select parties in a

any type of any meeting, workshop, hearing, or proceeding. The Commission cannot reserve the right that a party with a legal interest must intervene to participate or the language in this legislation might not be binding. Full transparency must be afforded to any party with a legal interest including shareholders/rate payers since some parties with a legal interest in a proceeding might not have the means and/or the ability to participate in such proceedings. This is supported by the fact that the Office of Public Counsel felt that they were not afforded the right to the settlement agreement in the past FPL case. Remember the Commission, Nominating Commission, Governor and State Attorney General's office are there to protect the interests of the citizens of Florida not special interest groups therefore an abundance of caution should be exercised with regard to providing any party with a legal interest the full ability to be fully heard according to law and to provide testimony to protect their legal interests. This includes full transparency to provide unbiased with no partially to select parties in any type of meeting, workshop, hearing, or proceeding.

(3) (a) The Legislature finds that it is important to have commissioners who are educated and informed on regulatory policies and developments in science, technology, business management, finance, law, and public policy which are associated with the industries that the commissioners regulate, and the Legislature also finds that it is in the public interest for commissioners to become educated and informed on these matters through active participation in meetings that are scheduled by the sponsoring organization, such as sessions, programs, or conferences, which are duly noticed and open to the public.

(b) As used in this subsection, the term "active participation" or the term "participating in" includes, but is not limited to, attending or speaking at educational sessions, participating in organization governance by attending meetings, serving on committees, or in leadership positions, participating

in panel discussions, and attending meals and receptions associated with such events that are open to all attendees.

(c) The prohibition in subsection (1) remains in effect at all times at such meetings wherever located. While participating in such meetings, a commissioner shall:

1. Refrain from commenting on or discussing the subject matter of any proceeding under s. 120.569 or s. 120.57 which is currently pending before the commission or which he or she knows or reasonably expects will be filed with the commission within 180 days after the meeting; and

2. Use reasonable care to ensure that the content of the educational session or other session in which the commissioner participates is not designed to address or create a forum to influence the commissioner on the subject matter of any proceeding under s. 120.569 or s. 120.57 which is currently pending before the commission or which he or she knows or reasonably expects will be filed with the commission within 180 days after the meeting ~~This section shall not apply to oral communications or discussions in scheduled and noticed open public meetings of educational programs or of a conference or other meeting of an association of regulatory agencies.~~

(7)

Rob Smith Comments:

The legislation below must support the level of experience to be able to sit on the Commission and in fairness to the Commissioners provide for protection under the "No Fear" provisions of Federal Law. If the appointment of such Commissioner without the proper level of experience rules on such rate making matters without the full understanding of such matters including accounting matters this might lead to a biased ruling which would be subject to test by a "trial de novo" "No exceptions!" The Commission process is governed by State rules and might be operated under the guidelines as set forth in this legislation which might provide for a test by "trial de novo". Even though there are parts of State law that provide for adherence to Federal law based upon preemption to provide for compliance with Federal Legislation, unless the process is fully transparent without bias the ability exists for a biased ruling on such matters.

The Commission must remain unbiased to all parties with a legal interest not just intervening parties with a legal interest. This is supported by the first statement of 350.042 "(1) A commissioner should accord to every person who is a legally interested in a proceeding....." This is where the Commission cannot coerce or force a party with a legal interest in a proceeding to intervene to be provided the same status of intervening parties. As long as a person has a fully vested legal interest in a proceeding there would be no reason why there should be any bias to accord to every person not select persons or only intervening parties.

ac·cord

/ə'kôrd/ 

verb

1. give or grant someone (power, status, or recognition).
 "the powers accorded to the head of state"
 synonyms: give, grant, present, award, vouchsafe; [More](#)

350.042 Ex parte communications.—

(1) A commissioner should accord to every person who is

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117 | legally interested in a proceeding, or the person's lawyer, full
 118 | right to be heard according to law, and, except as authorized by

Rob Smith Comments:

The legislation below provides for the Governor "shall remove from office a commissioner who willfully and knowingly violates this section and is authorized to enforce the findings and recommendations of the Commission on ethics. Who appoints the Commission on ethics? Since the Governor appoints this Commission the potential exists for a biased approach to such governance of these types of matters. Considering that the appointment process there must be full checks and balances to keep accountability across the board. No Exceptions! Again, if needed a "trial de novo" might be required to protect all parties with a legal interest.

Florida Commission on Ethics

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The Florida Commission on Ethics is a nine-member Commission, with a staff of approximately twenty five employees located in Tallahassee, that serves as the guardian of the standards of conduct for officers and employees of Florida and its political subdivisions and functions as an independent commission responsible for investigating and issuing public reports on complaints of breaches of the public trust by public officers and employees. The Commission also renders legally binding advisory opinions interpreting the ethics laws and implements the State's financial disclosure laws.

Composition


The Commission members serve two-year terms. Five members are appointed by the Governor, with no more than three from the same political party. One member appointed by the Governor must be a former city or county official. Two members are appointed by the President of the Senate and two members by the Speaker of the House of Representatives. Neither the President nor the Speaker may appoint more than one member from the same political party. No member may hold any public employment or serve more than two full terms in succession.

The Commission's Functions and Responsibilities

The Commission, by majority vote, interprets and applies Florida's ethics laws by taking action on the disposition of complaints, the recommendation of penalties, and the issuance of legal opinions. Also, the commission hires the Executive Director, recommends changes in the ethics laws to the Legislature, and adopts rules of procedure and an operating budget.

The Commission's Staff

- **The Legal Section** drafts legal opinions, orders, rules, and proposed legislation for consideration by the Commission, represents the Commission in litigation, and responds to inquiries about the ethics laws.
- **The Public Information Section** provides information regarding Commission practices and procedures to other states, the press, and the public, and responds to inquiries about the Commission and the ethics laws.
- **The Investigative Section** investigates complaints of violations of the ethics laws and writes narrative investigative reports.
- **The Financial Disclosure Section** handles and supervises the disclosure notification process, receives and maintains disclosure forms, enforces the timely filing of disclosure forms, and responds to inquiries about financial disclosure laws.
- **The Administrative Section** provides administrative and clerical support to Commissioners and staff.



Old Capitol

(7)

(b) If the Commission on Ethics finds that there has been a violation of this section by a public service commissioner, it shall provide the Governor and the Florida Public Service Commission Nominating Council with a report of its findings and recommendations. The Governor shall remove from office a commissioner who willfully and knowingly violates this section and is authorized to enforce the findings and recommendations of

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175 | the Commission on Ethics, pursuant to part III of chapter 112.

176 | Section 5. Section 350.0611, Florida Statutes, is amended
177 | to read:

178 | 350.0611 Public Counsel; duties and powers.—It shall be the
179 | duty of the Public Counsel to provide legal representation for
180 | the people of the state in proceedings before the commission and
181 | in proceedings before counties pursuant to s. 367.171(8). The
182 | Public Counsel shall have such powers as are necessary to carry
183 | out the duties of his or her office, including, but not limited
184 | to, the following specific powers:

185 | (1) To recommend to the commission or the counties, by
186 | petition, the commencement of any proceeding or action or to
187 | appear, in the name of the state or its citizens, in any
188 | proceeding or action before the commission or the counties and
189 | urge therein any position which he or she deems to be in the
190 | public interest, whether consistent or inconsistent with
191 | positions previously adopted by the commission or the counties,
192 | and utilize therein all forms of discovery available to
193 | attorneys in civil actions generally, subject to protective
194 | orders of the commission or the counties which shall be
195 | reviewable by summary procedure in the circuit courts of this
196 | state;

197 | (2) To have access to and use of all files, records, and
198 | data of the commission or the counties available to any other
199 | attorney representing parties in a proceeding before the
200 | commission or the counties;

Rob Smith Comments:

The legislation below should define a "party" Does this provide for all parties with a legal interest or just parties that intervene?

Very important considering that the original language provides for 350.042 "(1) A commissioner should accord to every person who is a legally interested in a proceeding....."

What does this mean "If he or she is not a party to the settlement agreement, it may not be submitted to or approved by the Commission? Does this mean just intervening parties or all parties with a legal interest? This must be in clear and concise language and does this only apply to the Office of Public Counsel since it is under 350.611? Again, all parties with a legal interest in any proceeding would have the liberty to choose a different court of jurisdiction by "trial de novo" if the possibility exists that there might have been a biased ruling. No Exceptions!

201 | (3) In any proceeding before the commission in which he or
202 | she has participated as a party, to be a party to a settlement
203 | agreement. If he or she is not a party to the settlement

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204 | agreement, it may not be submitted to or approved by the
205 | commission;

We have to define a party in clear and concise language.....

206 ~~(4)(3)~~ In any proceeding in which he or she has
207 participated as a party, to seek review of any determination,
208 finding, or order of the commission or the counties, or of any
209 hearing examiner designated by the commission or the counties,
210 in the name of the state or its citizens;

211 ~~(5)(4)~~ To prepare and issue reports, recommendations, and
212 proposed orders to the commission, the Governor, and the
213 Legislature on any matter or subject within the jurisdiction of
214 the commission, and to make such recommendations as he or she
215 deems appropriate for legislation relative to commission
216 procedures, rules, jurisdiction, personnel, and functions; and

217 ~~(6)(5)~~ To appear before other state agencies, federal
218 agencies, and state and federal courts in connection with
219 matters under the jurisdiction of the commission, in the name of
220 the state or its citizens.

221 Section 6. Subsection (1) of section 366.05, Florida
222 Statutes, is amended to read:

223 366.05 Powers.—

224 (1) (a) In the exercise of such jurisdiction, the commission
225 shall have power to prescribe fair and reasonable rates and
226 charges, classifications, standards of quality and measurements,
227 including the ability to adopt construction standards that
228 exceed the National Electrical Safety Code, for purposes of
229 ensuring the reliable provision of service, and service rules
230 and regulations to be observed by each public utility; to
231 require repairs, improvements, additions, replacements, and
232 extensions to the plant and equipment of any public utility when

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233 reasonably necessary to promote the convenience and welfare of
234 the public and secure adequate service or facilities for those
235 reasonably entitled thereto; to employ and fix the compensation
236 for such examiners and technical, legal, and clerical employees
237 as it deems necessary to carry out the provisions of this
238 chapter; and to adopt rules pursuant to ss. 120.536(1) and
239 120.54 to implement and enforce the provisions of this chapter.

240 **(b) If the commission authorizes a public utility to charge**
241 **tiered rates based upon levels of usage and to vary the billing**
242 **period, the utility may not charge a customer a higher rate**
243 **because of an increase in usage attributable to an extension of**
244 **the billing period.**

Rob Smith Comments:

The legislation below should provide for a transparent and unbiased approach to how each rate class tariffs are determine after the Commission rules on a rate increase/refund and/or settlement agreement. The legislation should provide to make

sure that the setting of rate class tariffs provide for no subsidization across rate classes and the full transparency that would be required to support the setting of the final tariffs in any Commission ruling on rate increases/refunds and/or settlement agreements. This includes the unbiased approach on non-cash amortization for over recoveries that have been determined during a rate case proceeding.

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262 (d) If a utility has more than one rate for any customer
263 class, it must notify each customer in that class of the
264 available rates and explain how the rate is charged to the
265 customer. If a customer contacts the utility seeking assistance
266 in selecting the most advantageous rate, the utility must
267 provide good faith assistance to the customer. The customer is
268 responsible for charges for service calculated under the
269 selected rate.

270 (e) New tariffs and changes to an existing tariff, other
271 than an administrative change that does not substantially change
272 the meaning or operation of the tariff, must be approved by vote
273 of the commission.

Rob Smith Comments:

The legislation below supports review of the States Attorney Office but there is still an avenue that unless the Nominating Commission and/or Commission moves to investigate a potential violation the ability to squash or remove the level of transparency that should be afforded to any party with a legal interest is still evident. This might require a party with a legal interest to move to a neutral venue in which it might need to protect its legal interests in any proceeding as brought forth to the Commission, Nominating Commission, Governor, State Attorney's Office. This in itself may lead to a "trial de novo" in which a new proceeding with a new set of facts can have an impact on a previous/existing ruling as set forth by the Commission.

343 350.043 Enforcement and interpretation.—Any violation of s.
344 350.031, s. 350.04, s. 350.041, s. 350.042, or s. 350.0605 by a
345 commissioner, former commissioner, former employee, or Public
346 Service Commission Nominating Council member shall be punishable
347 as provided in ss. 112.317 and 112.324. The Commission on Ethics
348 is hereby given the power and authority to investigate

2014 Florida Statutes

Title X PUBLIC OFFICERS, EMPLOYEES, AND RECORDS	Chapter 112 PUBLIC OFFICERS AND EMPLOYEES: GENERAL PROVISIONS Entire Chapter	SECTION 324 Procedures on complaints of violations and referrals; public records and meeting exemptions.
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112.324 Procedures on complaints of violations and referrals; public records and meeting exemptions.—

(1) The commission shall investigate an alleged violation of this part or other alleged breach of the public trust within the jurisdiction of the commission as provided in s. 8(f), Art. II of the State Constitution:

- (a) Upon a written complaint executed on a form prescribed by the commission and signed under oath or affirmation by any person; or
- (b) Upon receipt of a written referral of a possible violation of this part or other possible breach of the public trust from the Governor, the Department of Law Enforcement, a state attorney, or a United States Attorney which at least six members of the commission determine is sufficient to indicate a violation of this part or any other breach of the public trust.

Rob Smith Comments:

The legislation below also might provide for no checks and balances since the entire process is controlled by the Governor. Who would oversee the Governor with this process and how would a Commissioner who is appointed by the same process be able to request an advisory opinion from the Commission on Ethics when they are part of the same process? This is where the "State Attorney's Office" in most states takes the lead to provide for a fully transparent and unbiased process as afforded by both Federal/State law. This would include the ability to FOIA request any information related to any Commissioner request for advisory opinion from the Commissioner on ethics. This process must also be fully transparent for all parties with a legal interest to be 350.042 "(1) A commissioner should accord to every person who is a legally interested in a proceeding....." otherwise the potential exists for a proceeding by "trial de novo" in a court outside the State in a Federal venue if there was a biased ruling in such proceeding. "No Exceptions!

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349 | complaints of violation of this chapter in the manner provided
350 | in part III of chapter 112, as if this section were included in
351 | that part. A commissioner may request an advisory opinion from
352 | the Commission on Ethics as provided by s. 112.322(3)(a).
353 | Section 11. This act shall take effect July 1, 2015.