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FPSC - COMMISSION CLERK

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

**DATE:** July 9, 2015

**TO:** Office of Commission Clerk (Stauffer)

**FROM:** Office of the General Counsel (Gervasi) *PS S.M.C.*  
Office of Commission Clerk (Stauffer) *CMO*  
Division of Economics (Rome) *ARR EJD PA*

**RE:** Docket No. 150143-OT – Proposed repeal of Rule 25-22.028, F.A.C., Filing, Number of Copies, and proposed amendment of Rule 25-40.001, F.A.C., Exceptions to the Uniform Rules of Procedure.

**AGENDA:** 07/21/15 – Regular Agenda – Rule Proposal - Interested Persons May Participate

**COMMISSIONERS ASSIGNED:** All Commissioners

**PREHEARING OFFICER:** Brisé

**RULE STATUS:** Proposal May Be Deferred

**SPECIAL INSTRUCTIONS:** None

## Case Background

Rule 25-22.028, Florida Administrative Code (F.A.C.), Filing, Number of Copies, sets forth how to file documents in the Commission Clerk’s Office and the required number of copies of pleadings that must be submitted. Rule 25-22.028(1) states that filings may be made by U.S. Mail, hand delivery, or courier service; requires that filings by companies with gross annual operating revenues of more than \$750,000, Class A water and wastewater utilities, and parties to proceedings affecting those entities, must include a copy of the document on diskette, with certain exceptions for materials for which a request for confidential classification is pending and for attachments, such as exhibits attached to a petition; and requires that “[w]here a document is served upon a party . . . , its original and the appropriate copies, or, in the case of interrogatories or production of documents, a notice of service, shall be filed . . . no later than 5 days after service.” Rule 25-22.028(2) requires the original and seven copies of all pleadings to be

submitted, but that initial pleadings for rate increases, except for rate increases by water and wastewater companies, are required to be filed with 20 copies.

In 1998, when the Uniform Rules of Procedure (Uniform Rules) were implemented by the Administration Commission,<sup>1</sup> many of the Commission's procedural rules contained in Chapter 25-22, F.A.C., were rendered unnecessary and repealed. However, the Administration Commission granted the Commission exceptions from the Uniform Rules in order to keep certain of its rules, including Rule 25-22.028, F.A.C.<sup>2</sup> A list of all Commission rules that are exceptions to the Uniform Rules is contained in Rule 25-40.001, F.A.C., Exceptions to the Uniform Rules of Procedure.

This recommendation addresses whether the Commission should propose to repeal Rule 25-22.028, F.A.C., thus causing Uniform Rule 28-106.104, F.A.C., Filing, to take its place, and to amend Rule 25-40.001, F.A.C., to remove Rule 25-22.028 from the list of the Commission's exceptions to the Uniform Rules. The Commission's Notices of Development of Rulemaking were published in the Florida Administrative Register on April 15, 2015, in Volume 41, Number 73, and on June 9, 2015, in Volume 41, Number 111. No rule development workshop was requested, and thus a workshop was not held. The Commission has jurisdiction pursuant to sections 120.54, 120.569, 120.57, 350.01(7), and 350.127(2), Florida Statutes (F.S.).

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<sup>1</sup> Pursuant to section 14.202, F.S., the Administration Commission was created as part of the Executive Office of the Governor, and is composed of the Governor and Cabinet.

<sup>2</sup> Final Order of the Administration Commission disposing of the Commission's Petition for Exceptions to the Uniform Rules, issued June 24, 1998, in AC Case No. APA-98-007, and filed in Docket No. 980500-PU, In Re: Proposed Repeal of [various Commission rules contained in Rules 25-21 and 25-22, F.A.C.].

## Discussion of Issues

**Issue 1:** Should the Commission propose to repeal Rule 25-22.028, F.A.C., Filing, Number of Copies, thus causing Uniform Rule 28-106.104, F.A.C., to take its place, and to amend Rule 25-40.001, F.A.C., Exceptions to the Uniform Rules of Procedure, to remove Rule 25-22.028 from the list of the Commission's exceptions to the Uniform Rules?

**Recommendation:** Yes, the Commission should propose to repeal Rule 25-22.028, F.A.C., thus causing Uniform Rule 28-106.104, F.A.C., to take its place, and to amend Rule 25-40.001, F.A.C., to remove Rule 25-22.028 from the list of the Commission's exceptions to the Uniform Rules, as shown on Attachment A of this recommendation. (Gervasi, Stauffer, Rome)

**Staff Analysis:** Pursuant to subsection 120.54(5)(a)1., F.S., the Uniform Rules are the rules of procedure for each agency subject to Chapter 120, F.S., including the Commission, unless the Administration Commission grants an exception to the agency under that subsection. In its Petition for Exceptions to the Uniform Rules filed in 1998, the Commission argued that Rule 25-22.028 contained additional filing requirements for the larger regulated entities and parties to provide computer diskette files, multiple copies of filings, and the filing of notices of service of interrogatories and the production of documents.<sup>3</sup> The Administration Commission granted the exception to Uniform Rule 28-106.104, F.A.C., pursuant to subsection 120.54(5)(a)2., F.S., thus allowing the Commission to keep Rule 25-22.028 in place, upon determining that the exception was required for the most efficient operation of the agency.<sup>4</sup>

At the time of implementation of the Uniform Rules, the Commission had not yet begun accepting electronic filings. With the advent of electronic filing, the reasons for keeping Rule 25-22.028, F.A.C., have become obsolete. It is no longer necessary for the Commission to require companies with gross annual operating revenues of more than \$750,000, Class A water and wastewater utilities, and parties to proceedings affecting those entities, to include a copy of their filings on diskette, or on any other form of electronic media, such as a CD, DVD, or flash drive.

Moreover, electronically filed documents are published on the Commission's local area network and on its website. Therefore, it is unnecessary for the Commission to continue to require parties and interested persons to furnish additional copies of electronically filed documents, except for rate case minimum filing requirements (MFRs). MFRs are typically voluminous and contain numerous schedules of calculations, the quality of which tends to degrade and become difficult to read when scanned into an electronic format. Nevertheless, there is no need to require by rule that electronically filed MFRs must be accompanied by paper copies because Rule 28-101.001(2)(3), F.A.C., requires the acceptable nature and scope of electronic filings to be set forth in an agency's Statement of Agency Organization and Operation. Therefore, in addition to giving instructions on how to electronically file documents with the

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<sup>3</sup> Commission Petition for Exceptions to the Uniform Rules, filed April 15, 1998, in AC Case No. APA-98-007, and filed in Docket No. 980500-PU, In Re: Proposed Repeal of [various Commission rules contained in Rules 25-21 and 25-22, F.A.C.].

<sup>4</sup> Final Order of the Administration Commission disposing of the Commission's Petition for Exceptions to the Uniform Rules, issued June 24, 1998, in AC Case No. APA-98-007.

Commission, the “Filing Documents Electronically” section of the Commission’s Statement of Agency Organization and Operation states that:

[t]here is no requirement to file additional copies when documents are e-filed, except for rate case minimum filing requirements filed pursuant to Rules 25-6.043, 25-6.0435, 25-7.039, 25-7.040, 25-30.436, or 25-30.437, F.A.C., which electronic filings must be accompanied by the appropriate number of copies as provided by the rule or order under which the filing is made.

It is also unnecessary for the Commission to keep Rule 25-22.028 to require the filing of a notice of service when interrogatories or production of documents are served upon a party. The Uniform Rules require the filing of a notice of service of interrogatories. Rule 28-106.206, F.A.C., states that “parties may obtain discovery through the means and in the manner provided in Rules 1.280 through 1.400, Florida Rules of Civil Procedure,” and Rule 1.340(e), Florida Rules of Civil Procedure, requires the filing of a notice of service of interrogatories, giving the date of service and the name of the party to whom they were directed. And the requirement to file a notice of service of production of documents will be appropriately included in the standard language contained in Commission Orders Establishing Procedure.

Rule 25-40.001, F.A.C., clearly delineates the provisions of the Commission’s rules that provide exceptions to the Uniform Rules, as required by Section 120.54(5)(a)3., F.S. If the Commission proposes to repeal Rule 25-22.028, F.A.C., thus causing Uniform Rule 28-106.104, F.A.C., to take its place, the Commission should also propose to amend Rule 25-40.001, to remove Rule 25-22.028 from the list of the Commission’s exceptions to the Uniform Rules.

#### Statement of Estimated Regulatory Costs

The Florida Administrative Procedure Act encourages an agency to prepare a Statement of Estimated Regulatory Costs (SERC). Section 120.54(3)(b), F.S. An agency must prepare a SERC if the proposed rule is likely to directly or indirectly increase regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule, and shall consider the impact of the rule on small businesses, small counties, and small cities. Id.

Section 120.541(2)(a), F.S., requires a SERC to include an economic analysis showing whether the rule, directly or indirectly, is likely to: 1) have an adverse impact on economic growth, private sector job creation, employment, or investment; 2) have an adverse impact on business competitiveness; or 3) increase regulatory costs in excess of \$1 million in the aggregate within five years after the implementation of the rule. Section 120.541(3), F.S., requires that if the adverse impact or regulatory costs of the rule exceed any of those criteria, the rule shall be submitted to the President of the Senate and Speaker of the House, and may not take effect until it is ratified by the Legislature.

The SERC prepared by staff is included as Attachment B to this recommendation. It indicates that economic growth, private-sector job creation or employment, investment, and business competitiveness are not expected to be adversely impacted during the five-year period following implementation of the rules, and that the utilities affected may benefit from the

recommended rule changes. Based on the SERC, the recommended repeal of Rule 25-22.028 and amendment of Rule 25-40.001 will not require legislative ratification.

Attachment B also contains the estimated number of individuals and entities likely to be required to comply with the rules, the estimated cost of implementing and enforcing the rules, the estimated transactional costs likely to be incurred by individuals and entities required to comply with the rules, and an analysis of the impact on small businesses, small counties, and small cities. Section 120.541(2)(b)-(e), F.S., requires that a SERC include these considerations.

For the foregoing reasons, staff recommends that the Commission propose the repeal of Rule 25-22.028, F.A.C., thus causing Uniform Rule 28-106.104, F.A.C., to take its place, and to amend Rule 25-40.001, F.A.C., to remove Rule 25-22.028 from the list of the Commission's exceptions to the Uniform Rules, as shown on Attachment A of this recommendation.

**Issue 2:** Should this docket be closed?

**Recommendation:** Yes, if no requests for hearing or comments are filed, the rules as proposed should be filed for adoption with the Secretary of State and the docket should be closed. (Gervasi)

**Staff Analysis:** Unless comments or requests for hearing are filed, the rules as proposed may be filed with the Secretary of State without further Commission action. The docket may then be closed.

1 **25-22.028 Filing, Number of Copies.**

2 ~~(1) Filing. Filing shall be accomplished by submitting the original document and the~~  
3 ~~appropriate number of copies, as provided by rule, to the Office of Commission Clerk. Filing~~  
4 ~~may be made by U.S. Mail, hand delivery, or courier service. Filings on behalf of companies~~  
5 ~~with gross annual operating revenues derived from intrastate business in excess of \$750,000,~~  
6 ~~Class A water and sewer utilities, and parties to proceedings affecting these entities, shall also~~  
7 ~~include a copy of the document on diskette in word processing or spreadsheet format,~~  
8 ~~whichever is appropriate, when filing documents capable of being generated by word~~  
9 ~~processing or spreadsheet software. Material for which a request for confidential classification~~  
10 ~~is pending under Rule 25-22.006, F.A.C., should not be included in a diskette copy. The~~  
11 ~~diskette filing need not recreate document attachments not originally generated for the purpose~~  
12 ~~of filing with the Commission, such as exhibits attached to a petition. The copy of the~~  
13 ~~document on diskette shall be filed within 1 working day of the date the original printed~~  
14 ~~document is filed. Information about the word processing and spreadsheet software preferred~~  
15 ~~by the Commission may be obtained from the Director of the Division. Each diskette shall be~~  
16 ~~accompanied by a statement specifying the density of the diskette, the operating system and~~  
17 ~~the software used to prepare the document on diskette. For purposes of the requirement that~~  
18 ~~copies of documents be filed on diskette, “document” means all prehearing statements~~  
19 ~~regardless of length, and pleadings, post hearing statements of positions on issues or briefs,~~  
20 ~~proposed findings of fact and conclusions of law in excess of 5 pages exclusive of the service~~  
21 ~~list. In case of a discrepancy between an original printed document that is filed and the~~  
22 ~~document on diskette, the filed original document shall prevail. If the filing is made with the~~  
23 ~~presiding officer during the course of a hearing, as provided by subsection 28-106.104(1),~~  
24 ~~F.A.C., the responsible party shall ensure that a copy of the document is submitted on diskette~~  
25 ~~to the Division within 5 working days. Where a document is served upon a party pursuant to~~

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

1 ~~these rules, its original and the appropriate copies, or, in the case of interrogatories or~~  
2 ~~production of documents, a notice of service, shall be filed with the Office of Commission~~  
3 ~~Clerk no later than 5 days after service.~~  
4 ~~(2) Number of Copies. The original and seven copies of all pleadings shall be submitted to the~~  
5 ~~Office of Commission Clerk. However, initial pleadings for increases in rates, except rate~~  
6 ~~increases by water and wastewater utilities, shall be filed with 20 copies. The requirement for~~  
7 ~~filing 20 copies shall apply to all exhibits appended to the original petition, prepared testimony~~  
8 ~~and exhibits, briefs and other supplemental data requested by the Commission.~~  
9 *Rulemaking Authority 350.01(7), 350.127(2) FS. Law Implemented 120.569, 120.57 FS.*  
10 *History—Formerly 25-2.58, Amended 12-21-81, Formerly 25-22.28, Amended 2-11-92, 5-3-99,*  
11 *Repealed \_\_\_\_\_.*

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1 **25-40.001 Exceptions to the Uniform Rules of Procedure.**

2 The following provisions of the Commission’s rules are exceptions to the uniform rules of  
 3 procedure:

UNIFORM RULE	COMMISSION RULE THAT IS AN EXCEPTION
4 CHAPTER 28-102, F.A.C. 5 6 AGENDA AND SCHEDULING OF 7 MEETINGS 8 9 AND WORKSHOPS	Rule 25-22.0021, F.A.C.  Agenda Conference Participation.
10 CHAPTER 28-102, F.A.C. – AGENDA AND 11 SCHEDULING OF MEETINGS AND 12 WORKSHOPS 13 AND CHAPTER 28-106 –DECISIONS 14 DETERMINING SUBSTANTIAL INTERESTS	Rule 25-22.0022, F.A.C.  Oral Argument Rule.
15 Rule 28-102.001, F.A.C. 16 Notice of Public Meeting, Hearing, or 17 Workshop.	Rule 25-22.001, F.A.C.  Notice of Meeting or Workshop.
18 Subsection 28-102.002(2), F.A.C. 19 Agenda of Meetings, Hearings, and Workshops.	Rule 25-22.002, F.A.C.  Agenda of Meetings.
20 CHAPTER 28-103, F.A.C. 21 RULEMAKING	Rule 25-22.017, F.A.C.  Rulemaking Proceeding – Adoption.
22 CHAPTER 28-106, F.A.C. 23 DECISIONS DETERMINING SUBSTANTIAL 24 INTERESTS	Rule 25-22.006, F.A.C.  Confidential Information.  Rule 25-22.029, F.A.C.

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1		Point of Entry Into Proposed Agency Action
2		Proceedings.
3		Rule 25-22.0376, F.A.C.
4		Reconsideration of Non-Final Orders.
5		Subsections 25-22.0406(7)-(8) , F.A.C.
6		Notice and Public Information on General Rate
7		Increase
8		Requests by Electric, Gas and Telephone
9		Companies.
10		Subsections 25-22.0407(8) and (10) , F.A.C.
11		Notice of and Public Information for General
12		Rate
13		Increase Requests by Water and Wastewater
14		Utilities.
15		Rule 25-22.060, F.A.C.
16		Motion for Reconsideration.
17	<del>Rule 28-106.104, F.A.C.</del>	<del>Rule 25-22.028, F.A.C.</del>
18	<del>Filing.</del>	<del>Filing, Number of Copies.</del>
19	Rule 28-106.205, F.A.C.	Rule 25-22.039, F.A.C.
20	Intervention.	Intervention.
21	Rule 28-106.208, F.A.C.	Rule 25-22.029, F.A.C.
22	Notice of Hearing.	Point of Entry into PAA Proceeding.
23		Rule 25-22.0405, F.A.C.
24		Notices of Hearings.
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1	Rule 28-106.212, F.A.C.	Rule 25-22.045, F.A.C.
2	Subpoenas.	Subpoenas.
3	CHAPTER 28-107 LICENSING	Rule 25-22.075, F.A.C.
4		Transmission Line Permitting Proceedings.
5		Rule 25-22.080, F.A.C.
6		Electrical Power Plant Permitting Proceedings.
7	<i>Rulemaking Authority 120.54(5)(a)3. FS. Law Implemented 120.54(5)(a)3. FS. History—New</i>	
8	<i>4-28-99, Amended 3-28-07, _____.</i>	
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**28-106.104 Filing.**

(1) In construing these rules or any order of a presiding officer, filing shall mean received by the office of the agency clerk during normal business hours or by the presiding officer during the course of a hearing.

(2) All pleadings filed with the agency shall contain the following:

(a) The style of the proceeding involved;

(b) The docket, case or file number, if any;

(c) The name of the party on whose behalf the pleading is filed;

(d) The name, address, any e-mail address, and telephone number of the person filing the pleading;

(e) The signature of the person filing the pleading; and

(f) A certificate of service that copies have been furnished to all other parties as required by subsection (4) of this rule.

(3) Any document received by the office of the agency clerk before 5:00 p.m. shall be filed as of that day but any document received after 5:00 p.m. shall be filed as of 8:00 a.m. on the next regular business day.

(4) Whenever a party files a pleading or other document with the agency, that party shall serve copies of the pleading or other document upon all other parties to the proceeding. A certificate of service shall accompany each pleading or other document filed with the agency.

(5) All parties, if they are not represented, or their attorneys or qualified representatives shall promptly notify all other parties and the presiding officer of any changes to their contact information by filing a notice of the change.

(6) All papers filed shall be titled to indicate clearly the subject matter of the paper and the party requesting relief.

(7) All original pleadings shall be on white paper measuring 8 1/2 by 11 inches, with margins of no less than one inch. Originals shall be printed or typewritten.

(8) A document shall be filed by only one method (e-filing, facsimile, courier, hand-delivery, or U.S. mail) and shall not be filed multiple times. A duplicate filing will not be docketed and will be destroyed.

*Rulemaking Authority 14.202, 120.54(5) FS. Law Implemented 120.54(5) FS. History—New 4-1-97, Amended 1-15-07, 2-5-13.*

State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

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**DATE:** June 5, 2015  
**TO:** Rosanne Gervasi, Senior Attorney, Office of the General Counsel  
**FROM:** Clyde D. Rome, Public Utility Analyst II, Division of Economics *CDR*  
**RE:** Statement of Estimated Regulatory Costs for Proposed Repeal of Rule 25-22.028  
and Amendment of Rule 25-40.001, Florida Administrative Code (F.A.C.)

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The recommended rule revisions are intended to streamline the requirements for entities that submit filings to the Commission. Rule 25-22.028, F.A.C., is being recommended for repeal in favor of Rule 28-106.104, F.A.C. (Uniform Filing Rule) The Uniform Filing Rule and the "Filing Documents Electronically" section of the Commission's *Statement of Agency Organization & Operations* provide substantial guidance regarding how materials should be filed with the Commission. Rule 25-40.001, F.A.C., would be amended to delete Rule 25-22.028, F.A.C., from the list of exceptions to the Uniform Rules of Procedure. As noted in the attached Statement of Estimated Regulatory Costs (SERC), the Commission received an average of 8,479 filings annually for the years 2010 through 2014.

It is anticipated that affected entities may benefit from the recommended rule changes. No workshop was requested in conjunction with the recommended rule revisions. No regulatory alternatives were submitted pursuant to paragraph 120.541(1)(a), F.S. None of the impact/cost criteria established in paragraph 120.541(2)(a), F.S., will be exceeded as a result of the recommended revisions.

cc: (Draper, Daniel, Dean, Stauffer, Cibula, SERC file)

FLORIDA PUBLIC SERVICE COMMISSION  
STATEMENT OF ESTIMATED REGULATORY COSTS  
Rules 25-22.028 and 25-40.001, F.A.C.

1. Will the proposed rule have an adverse impact on small business?  
[120.541(1)(b), F.S.] (See Section E., below, for definition of small business.)

Yes  No

If the answer to Question 1 is "yes", see comments in Section E.

2. Is the proposed rule likely to directly or indirectly increase regulatory costs in excess of \$200,000 in the aggregate in this state within 1 year after implementation of the rule? [120.541(1)(b), F.S.]

Yes  No

If the answer to either question above is "yes", a Statement of Estimated Regulatory Costs (SERC) must be prepared. The SERC shall include an economic analysis showing:

A. Whether the rule directly or indirectly:

(1) Is likely to have an adverse impact on any of the following in excess of \$1 million in the aggregate within 5 years after implementation of the rule?  
[120.541(2)(a)1, F.S.]

Economic growth Yes  No

Private-sector job creation or employment Yes  No

Private-sector investment Yes  No

(2) Is likely to have an adverse impact on any of the following in excess of \$1 million in the aggregate within 5 years after implementation of the rule?  
[120.541(2)(a)2, F.S.]

Business competitiveness (including the ability of persons doing business in the state to compete with persons doing business in other states or domestic markets) Yes  No

Productivity Yes  No

Innovation Yes  No

(3) Is likely to increase regulatory costs, including any transactional costs, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule? [120.541(2)(a)3, F.S.]

Yes  No

Economic Analysis: Affected entities may benefit from the recommended rule changes. A summary of the recommended rule revisions is included in the attached memorandum to Counsel.

B. A good faith estimate of: [120.541(2)(b), F.S.]

(1) The number of individuals and entities likely to be required to comply with the rule.

From 2010 through 2014, the Commission received an average of 8479 filings per year.

(2) A general description of the types of individuals likely to be affected by the rule.

Potentially affected entities include all persons and organizations who submit filings to the Commission.

C. A good faith estimate of: [120.541(2)(c), F.S.]

(1) The cost to the Commission to implement and enforce the rule.

- None. To be done with the current workload and existing staff.
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

(2) The cost to any other state and local government entity to implement and enforce the rule.

- None. The rule will only affect the Commission.
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

(3) Any anticipated effect on state or local revenues.

- None
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

D. A good faith estimate of the transactional costs likely to be incurred by individuals and entities (including local government entities) required to comply with the requirements of the rule. "Transactional costs" include filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used, procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring or reporting, and any other costs necessary to comply with the rule. [120.541(2)(d), F.S.]

- None. The rule will only affect the Commission
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

Affected entities are not expected to incur any additional transactional costs.

E. An analysis of the impact on small businesses, and small counties and small cities: [120.541(2)(e), F.S.]

(1) "Small business" is defined by Section 288.703, F.S., as an independently owned and operated business concern that employs 200 or fewer permanent full-time employees and that, together with its affiliates, has a net worth of not more than \$5 million or any firm based in this state which has a Small Business Administration 8(a) certification. As to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments.

- No adverse impact on small business.
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.



(2) A "Small City" is defined by Section 120.52, F.S., as any municipality that has an unincarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by Section 120.52, F.S., as any county that has an unincarcerated population of 75,000 or less according to the most recent decennial census.

- No impact on small cities or small counties
- Minimal. Provide a brief explanation.
- Other. Provide an explanation for estimate and methodology used.

F. Any additional information that the Commission determines may be useful.  
[120.541(2)(f), F.S.]

- None.

Additional Information:

G. A description of any regulatory alternatives submitted and a statement adopting the alternative or a statement of the reasons for rejecting the alternative in favor of the proposed rule. [120.541(2)(g), F.S.]

- No regulatory alternatives were submitted.
- A regulatory alternative was received from
  - Adopted in its entirety.
  - Rejected. Describe what alternative was rejected and provide a statement of the reason for rejecting that alternative.