

STATE OF FLORIDA

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OFFICE OF THE GENERAL COUNSEL
KEITH C. HETRICK
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

September 3, 2020

Kenneth J. Plante, Coordinator
Joint Administrative Procedures Committee
Room 680, Pepper Building
111 W. Madison Street
Tallahassee, FL 32399-1400
japc@leg.state.fl.us

VIA E-MAIL

RECEIVED-FPSC
2020 SEP -3 AM 10:33
COMMISSION
CLERK

Re: Docket No. 20200186-EU; Rules 25-6.047, Constant Current Standards; 25-6.054, Laboratory Standards; 25-6.074, Applicability; 25-6.081, Construction Practices; 25-6.082, Records and Reports; and 25-6.104, Unauthorized Use of Energy, F.A.C.

Dear Mr. Plante:

Enclosed are the following materials concerning the above referenced proposed rules:

1. A copy of the proposed rules.
2. There are no materials incorporated by reference in the proposed rules.
3. A copy of the F.A.R. notice.
4. A statement of facts and circumstances justifying the proposed rules.
5. A federal standards statement.
6. Statement of Estimated Regulatory Costs for the rules.

Mr. Kenneth J. Plante
September 3, 2020
Page 2

If there are any questions with respect to these rules, please do not hesitate to contact me at kcowdery@psc.stat.fl.us or 413-6216.

Sincerely,

/s/ Kathryn G.W. Cowdery
Kathryn G.W. Cowdery
Senior Attorney

Enclosures

cc: Office of Commission Clerk

1 **25-6.047 Constant Current Standards.**

2 ~~(1) Equipment supplying constant current street lighting circuits shall be so adjusted as to~~
3 ~~furnish as nearly as is practicable the rated current of the circuit supplied and, under normal~~
4 ~~operating conditions, the current shall not vary more than 4% above or below the rated current~~
5 ~~of the circuit.~~

6 ~~(2) At least once a year the current output of the equipment supplying constant current~~
7 ~~circuits shall be checked and the equipment adjusted if necessary.~~

8 *Rulemaking Authority 366.05(1) FS. Law Implemented 366.03, 366.04(2)(c), (5) FS. History—*
9 *New 7-29-69, Formerly 25-6.47, Repealed_____.*

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

1 **25-6.054 Laboratory Standards.**

2 (1) Each utility shall have available one or more watthour meters to be used as basic
3 reference standards. The watthour meters must have an adequate capacity and voltage range to
4 test all portable standards used by the utility and must meet the requirements described in
5 subsection 25-6.055(1), F.A.C.

6 (a) Watthour meters used as basic reference standards shall not be in error by more than
7 plus or minus 0.05 percent at 1.00 power factor or by more than 0.10 percent at 0.50 power
8 factor. Watthour meters shall not be used to check or calibrate portable standard watthour
9 meters unless the basic reference standard watthour meter has been checked and adjusted, if
10 necessary, to the prescribed accuracy within the preceding twelve months.

11 (b) The percent registration of each basic reference standard watthour meter shall be
12 compared with the percent registration of all other basic reference standard watthour meters
13 used by the utility.

14 (2) Each utility shall establish traceability of its watthour standard to the national standards
15 at least annually using one of the following methods:

16 (a) Through the Measurement Assurance Program (MAP) in which the National Institute
17 of Standards and Technology (NIST) has provided a transport standard; or

18 (b) Through a transport standard which is of the same nominal value and of quality equal
19 to the basic reference standards that are sent to NIST or to an independent laboratory approved
20 by the Commission.

21 (3) If error exceeding that referenced in paragraph 25-6.054(1)(a), F.A.C., in the percent
22 registration of a watthour meter used as a basic reference standard is observed in the
23 comparisons in paragraph 25-6.054(2)(b), F.A.C., the utility shall investigate the source of the
24 error. If the cause of the error cannot be corrected, use of the watthour meter as a basic
25 reference standard shall be discontinued.

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

1 (4) Each utility shall maintain the following historical performance records for each
2 wathour meter used as a basic reference standard until the meter is no longer in use ~~for the~~
3 ~~following types of comparisons:~~

- 4 (a) Comparisons of basic reference standards with national standards; and
- 5 (b) Intercomparisons made with other basic reference standards.

6 *Rulemaking Authority 350.127(2), 366.05(1) FS. Law Implemented 366.05(1),(3) FS. History—*
7 *New 7-29-69, Amended 4-13-80, 5-13-85, Formerly 25-6.54, Amended 5-19-97,*

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25-6.074 Applicability.

~~(1) Extensions of electric distribution lines applied for after the effective date of these rules, and~~ necessary to furnish permanent electric service to all structures within a new residential subdivision, or to new multiple-occupancy buildings, shall be made underground when requested by an applicant or required by governmental authority.

~~(2) Such extensions of service shall be made by the utility in accordance with the provisions in these rules.~~

Rulemaking Authority 350.127(2), 366.05(1) FS. Law Implemented 366.03 FS. History—New 4-10-71, Formerly 25-6.74, Amended _____.

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25-6.081 Construction Practices.

~~(1) The provisions in these rules are based on the premise that each applicant and utility will provide a cooperative effort to keep the cost of construction and installation of underground systems as low as possible.~~

~~(2) Each utility shall undertake to further improve underground construction proficiency toward the end that the downward trends in underground construction costs may be continued.~~

~~(3) To the extent practicable, joint use of trenches by all utilities shall be undertaken where economies can be realized without impairment to safety or service, care being taken to conform to any applicable Code and utility specification.~~

~~(4) To the extent practicable, where existing aerial facilities are being retired and removed from service, replacement will be made with underground construction whenever economically feasible.~~

Rulemaking Authority 366.05(1) FS. Law Implemented 366.03 FS. History—New 4-10-71, Formerly 25-6.81, Repealed.

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

1 **25-6.082 Records and Reports.**

2 ~~(1) To insure the development and availability of appropriate data necessary to satisfy the~~
3 ~~reporting requirements of Rule 25-6.078, F.A.C., herein, each utility shall maintain separate~~
4 ~~records or sub-accounts for underground distribution construction, operation and maintenance~~
5 ~~costs.~~

6 ~~(2) Records shall also be maintained of experienced results obtained in the use of joint~~
7 ~~trenching, in such manner and detail as will afford an opportunity to evaluate the economies~~
8 ~~available using this practice.~~

9 *Rulemaking Authority 366.04(2)(f), 366.05(1) FS. Law Implemented 350.115, 366.03,*
10 *366.04(2)(a), (f) FS. History—New 4-10-71, Formerly 25-6-82, Amended 10-29-97,*
11 *Repealed*.

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1 **25-6.104 Unauthorized Use of Energy.**

2 In the event of unauthorized or fraudulent use, or meter tampering, the utility may bill the
3 customer for the time period at issue using an ~~on-a-reasonable~~ estimate of the energy used,
4 which may include factors such as historical usage, meter data, meter test data, approximate
5 size of the residence or building, the types of appliances and equipment using electricity, use
6 of air conditioning and electric heating, and the number of occupants.

7 *Rulemaking Authority 350.127(2), 366.05(1) FS. Law Implemented 366.03, 366.05(1) FS.*

8 *History—New 7-29-69, Amended 4-13-80, 5-3-82, 11-21-82, _____.*

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Notice of Proposed Rule

PUBLIC SERVICE COMMISSION

RULE NOS: RULE TITLES

25-6.047 Constant Current Standards
25-6.054 Laboratory Standards
25-6.074 Applicability
25-6.081 Construction Practices
25-6.082 Records and Reports
25-6.104 Unauthorized Use of Energy

PURPOSE AND EFFECT: Rules 25-6.047, 25-6.081, and 25-6.082, F.A.C., are repealed as obsolete and unnecessary to implement the Commission's authority. Rule 25-6.054, F.A.C. is amended to add specificity to the rule, which gives clarity and guidance to utilities. Rule 25-6.074, F.A.C. concerning residential electric underground extensions is amended to repeal language that is obsolete and unnecessary to implement the Commission's authority. Rule 25-6.104, F.A.C. is amended to identify factors that may be used by utilities in determining an estimate of the energy used for purposes of billing customers in the event of unauthorized or fraudulent use or meter tampering, which gives clarity and guidance to the utility and its customers.

Docket No. 20200186-EU

SUMMARY: Rules 25-6.047, 25-6.081, and 25-6.082, F.A.C. are repealed as obsolete and unnecessary. Rule 25-6.054, F.A.C. identifies a specific period of time that certain records must be maintained by electric utilities. Rule 25-6.074, F.A.C. concerning residential electric underground extensions deletes language that is obsolete and unnecessary to implementation of the Commission's authority. Rule 25-6.104, F.A.C. is amended to identify factors that may be used by utilities in determining a reasonable estimate of the energy used for purposes of billing customers in the event of unauthorized or fraudulent use or meter tampering.

SUMMARY OF STATEMENT OF ESTIMATED REGULATORY COSTS AND LEGISLATIVE RATIFICATION: The agency has determined that this will not have an adverse impact on small business or likely increase directly or indirectly regulatory costs in excess of \$200,000 in the aggregate within one year after the implementation of the rules. A SERC has been prepared by the agency. The SERC examined the factors required by Section 120.541(2), FS, and concluded that the rule amendments/repeals will not have an adverse impact on economic growth, business competitiveness, or small business and that there would likely be transactional cost savings to the individual and entities, including government entities, required to comply with the rule.

The agency has determined that the proposed rule is not expected to require legislative ratification based on the statement of estimated regulatory costs or if no SERC is required, the information expressly relied upon and described herein: based upon the information contained in the SERC

Any person who wishes to provide information regarding a statement of estimated regulatory costs, or provide a proposal for a lower cost regulatory alternative must do so in writing within 21 days of this notice.

RULEMAKING AUTHORITY: 350.127(2), 366.04(2)(f), 366.05(1) FS

LAW IMPLEMENTED: 350.115, 366.03, 366.04(2)(a), (c), (f), (5), 366.05(1), (3) FS

IF REQUESTED WITHIN 21 DAYS OF THE DATE OF THIS NOTICE, A HEARING WILL BE SCHEDULED AND ANNOUNCED IN THE FAR.

THE PERSON TO BE CONTACTED REGARDING THE PROPOSED RULE IS: Kathryn G.W. Cowdery, Office of General Counsel, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, (850)413-6216, kcowdery@psc.state.fl.us

THE FULL TEXT OF THE PROPOSED RULE IS:

25-6.047 Constant Current Standards.

Rulemaking Authority 366.05(1) FS. Law Implemented 366.03, 366.04(2)(c), (5) FS. History--New 7-29-69, Formerly 25-6.47, Repealed _____.

25-6.054 Laboratory Standards.

(1) through (3) No change.

(4) Each utility shall maintain the following historical performance records for each watt-hour meter used as a basic reference standard until the meter is no longer in use for the following types of comparisons:

(a) through (b) No change

Rulemaking Authority 350.127(2), 366.05(1) FS. Law Implemented 366.05(1), (3) FS. History—New 7-29-69, Amended 4-13-80, 5-13-85, Formerly 25-6.54, Amended 5-19-97, _____.

25-6.074 Applicability.

(1) Extensions of electric distribution lines ~~applied for after the effective date of these rules,~~ and necessary to furnish permanent electric service to all structures within a new residential subdivision, or to new multiple-occupancy buildings, shall be made underground when requested by an applicant or required by governmental authority.

(2) ~~Such extensions of service shall be made by the utility in accordance with the provisions in these rules.~~

Rulemaking Authority 350.127(2), 366.05(1) FS. Law Implemented 366.03 FS. History—New 4-10-71, Formerly 25-6.74, Amended _____.

25-6.081 Construction Practices.

Rulemaking Authority 366.05(1) FS. Law Implemented 366.03 FS. History—New 4-10-71, Formerly 25-6.81, Repealed _____.

25-6.082 Records and Reports.

Rulemaking Authority 366.04(2)(f), 366.05(1) FS. Law Implemented 350.115, 366.03, 366.04(2)(a), (f) FS. History—New 4-10-71, Formerly 25-6-82, Amended 10-29-97, Repealed _____.

25-6.104 Unauthorized Use of Energy.

In the event of unauthorized or fraudulent use, or meter tampering, the utility may bill the customer for the time period at issue using an on-a-reasonable estimate of the energy used, which may include factors such as historical usage, meter data, meter test data, approximate size of the residence or building, the types of appliances and equipment using electricity, use of air conditioning and electric heating, and the number of occupants.

Rulemaking Authority 350.127(2), 366.05(1) FS. Law Implemented 366.03, 366.05(1) FS. History—New 7-29-69, Amended 4-13-80, 5-3-82, 11-21-82, _____.

NAME OF PERSON ORIGINATING PROPOSED RULE: Kathryn G.W. Cowdery

NAME OF AGENCY HEAD WHO APPROVED THE PROPOSED RULE: Florida Public Service Commission

DATE PROPOSED RULE APPROVED BY AGENCY HEAD: September 1, 2020

DATE NOTICE OF PROPOSED RULE DEVELOPMENT PUBLISHED IN FAR: Volume 45, Number 111, June 7, 2019 and Volume 46, Number 26, February 7, 2020.

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 23, 2020

TO: Kathryn Gale Winter Cowdery, Senior Attorney, Office of the General Counsel

FROM: Sevini K. Guffey, Public Utility Analyst III, Division of Economics *S.K.G.*

RE: Statement of Estimated Regulatory Costs (SERC) for Recommended Repeal of Rules 25-6.047, Constant Current Standards; 25-6.081, Construction Practices; and 25-6.082, Records and Reports; Florida Administrative Code (F.A.C.) and Recommended Amendments to Rules 25-6.054, Laboratory Standards; 25-6.074, Applicability; and 25-6.104, Unauthorized Use of Energy, F.A.C.

Commission staff is recommending the repeal of Rules 25-6.047, Constant Current Standards; 25-6.081, Construction Practices; and 25-6.082, Records and Reports, F.A.C., because these rules have become obsolete, and do not meet the current requirements of Chapter 120, Florida Statutes (F.S.).

Commission staff is also recommending amendments to Rules 25-6.054, Laboratory Standards; 25-6.074, Applicability; and 25-6.104, Unauthorized Use of Energy, F.A.C., that are applicable to investor-owned electric utilities. Recommended amendments to Rule 25-6.054, F.A.C., will identify a specific period of time that the historical performance records must be maintained by electric utilities. Recommended amendments to Rule 25-6.074, F.A.C., delete unnecessary rule language in section (1) and delete section (2) in its entirety as it is obsolete. Recommended amendments to Rule 25-6.104, F.A.C., provides that the estimate of energy used for the time period at issue should be based upon factors such as historical usage, meter data, meter test data, approximate size of the residence or building, types of electric appliances and equipment in use, air conditioning and electric heating, and number of occupants for identification and recovery of the costs of unauthorized or fraudulently used energy. The recommended amendments to this rule codify existing utility practice to determine estimates under this rule. The recommended revisions are discussed in detail in the staff recommendation.

A Notice of Rule Development for Rules 25-6.047, 25-6.081, 25-6.082, 25-6.054, 25-6.074, and 25-6.104, F.A.C., appeared in the February 7, 2020 edition of the F.A.R. There was no request for a rule development workshop, and a workshop was not held.

The attached SERC addresses the economic impacts and considerations required pursuant to Section 120.541, F.S. The SERC analysis indicates that the recommended repeal of Rules 25-6.047, 25-6.081, and 25-6.082, F.A.C., and recommended amendments to Rules 25-6.054, 25-6.074, and 25-6.104, F.A.C., will not likely increase regulatory costs, including any transactional costs or have an adverse impact on business competitiveness, productivity, or innovation in

excess of \$1 million in the aggregate within five years of implementation. The recommended amendments would not potentially have adverse impacts on small businesses, would have no implementation cost to the Commission or other state and local government entities, and would have no impact on small cities or counties.

No regulatory alternatives were submitted pursuant to Section 120.541(1)(g), F.S. The SERC concludes that none of the impacts/cost criteria established in Sections 120.541(2)(a), (c), (d), and (e), F.S., will be exceeded as a result of the proposed rule revisions.

cc: SERC File

**FLORIDA PUBLIC SERVICE COMMISSION
STATEMENT OF ESTIMATED REGULATORY COSTS**
Rules 25-6.047, 25-6.054, 25-6.074, 25-6.081, 25-6.082, and 25-6.104, 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: Staff is recommending the repeal of Rules 25-6.047, Constant Current Standard; 25-6.081, Construction Practices; and 25-6.082, Records and Reports, F.A.C. because they have become obsolete, and/or do not meet the current requirements of Chapter 120, F.S. The repeal would not have an economic impact on the five investor-owned electric utilities.

Recommended amendments to Rule 25-6.054, Laboratory Standards, F.A.C., will identify a specific period of time that the historical performance records must be maintained by utilities. Recommended amendments to Rule 25-6.074, Applicability, F.A.C., delete as obsolete and unnecessary the rule language in sections (1) and (2). Recommended amendments to Rule 25-6.104, Unauthorized Use of Energy, F.A.C. provides that the estimate of energy used for the time period at issue should be based upon factors such as historical usage, meter data, meter test data, approximate size of the residence or building, types of electric appliances and equipment in use, air conditioning and electric heating, and number of occupants for identification and recovery of the costs of unauthorized or fraudulent use of energy. The recommended amendments to this rule codify existing practice currently used by utilities to determine estimates under this rule and will not create an additional economic impact on the five investor-owned electric utilities.

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.

Florida's five investor-owned electric utilities will be required to comply with the three amended rules related to laboratory standards, applicability of residential underground extensions, and unauthorized use of energy.

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

Recommended amendments to Rule 25-6.104, F.A.C. codifies existing practice currently used by electric utilities to estimate energy used for the time period at issue when individuals tamper with electric meters and/or use electricity fraudulently.

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.

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.

Minimal. Provide a brief explanation.

Other. Provide an explanation for estimate and methodology used.

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.

Rules 25-6.047, 25-6.054, 25-6.074,
25-6.081, 25-6.082, and 25-6.104,
F.A.C.
Docket No. 20200186-EU

STATEMENT OF FACTS AND CIRCUMSTANCES
JUSTIFYING RULE

Rule 25-6.047, F.A.C., addressing equipment supplying constant current street lighting circuits is repealed as obsolete and unnecessary because electric utilities no longer use such equipment.

Rule 25-6.054, F.A.C., establishes reference standards for certain electric watt-hour meters. The rule is amended to identify a specific period of time that the historical performance records must be maintained by utilities.

Rule 25-6.074, F.A.C., addresses residential electric underground extensions. Language in Rule 25-6.074(1), F.A.C., referring to extensions applied for after the 1971 effective date of the rule is removed as obsolete. Section (2) of the rule provided that extensions must be made in accordance with the Commission rules for residential electric underground extensions. This section is deleted as unnecessary because other rules in chapter 25-6, F.A.C., by their terms apply to these extensions and include specific requirements to be followed.

Rule 25-6.081, F.A.C., addresses construction and installation of underground systems. This rule, adopted in 1971, contains aspirational goals for utilities. The rule is repealed as unnecessary to implement the Commission's statutory authority because other Commission rules give clear requirements concerning construction and installation of underground systems.

Rule 25-6.082, F.A.C., contains certain recordkeeping requirements for underground distribution construction, operation and maintenance costs, and the use of joint trenching. This rule is repealed as obsolete because another, more recent rule supersedes Rule 25-6.082 and requires the relevant recordkeeping requirements.

Rule 25-6.104, F.A.C., is amended to identify factors that may be used by utilities in determining a reasonable estimate of the energy used for purposes of billing customers in the event of unauthorized or fraudulent use or meter tampering.

STATEMENT ON FEDERAL STANDARDS

There are no federal standards for these rules.

Julie Phillips

From: Joint Administrative Procedures Committee <japc@leg.state.fl.us>
Sent: Thursday, September 03, 2020 10:10 AM
To: Kathryn Cowdery
Cc: Julie Phillips
Subject: RE: Section 120.54(3)(a)4., F.S. proposed rule information
Attachments: 20200186 JAPC pkt.pdf

This email is to acknowledge receipt of your email regarding amendments and repeals to Ch. 25-6 per your request.

From: Kathryn Cowdery <kcowdery@PSC.STATE.FL.US>
Sent: Thursday, September 3, 2020 9:54 AM
To: Joint Administrative Procedures Committee <japc@leg.state.fl.us>
Cc: Julie Phillips <JPhillip@PSC.STATE.FL.US>
Subject: Section 120.54(3)(a)4., F.S. proposed rule information

Good morning:

Attached is the information required by Section 120.54(3)(a)4, F.S., for the proposed rule amendments and repeals from FPSC Docket No. 20200186-EU.

Please acknowledge receipt of this e-mail by Reply-All.

Please contact me if you have any questions. Thank you.

Kathryn Cowdery
Senior Attorney
Florida Public Service Commission