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**September 22, 2020
VIA E-FILING**

Adam Teitzman, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Docket No. 20200193-PU; Proposed Amendments to MFR Rules

Dear Mr. Teitzman:

Not as large a step as it should be, but a step in the right direction towards totally paperless filings. My specific comments on proposed changes to Rule 25-30.436:

(4) This section requires the e-filing to be “accompanied” by ten paper copies. Technically, an e-filing cannot go along with paper documents. This also creates logistical issues for out of town filers and I would ask that the change include the paper copies to be delivered to the clerk the next business day after the e-filing. Also, I would request the staff re-evaluate whether it really needs ten paper copies, or any paper copies for that matter. While it is less than is currently required it is still excessive. An excel copy of the MFRs is required and should be just as easy for staff to navigate the various Schedules by the tabs. The ten staff members who think they need a paper copy of the MFRs should be introduced into the digital age. The same comments apply to (5)(d).

As to Rule 25-30.437(3), two paper copies is excessive. In lieu of paper copies, electronic files should be required to be filed with the Clerk along with the proposed required excel file of the MFRs. In the recent UIF rate case this requirement amounted to over 16,000 copies (2 ½ boxes of paper). Also, there is some question as to whether the current e-filing allows for filing 8,000 pages (1.4 GB). An electronic copy is more user friendly for staff review. Further, this additional rate case expense is unnecessary.

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Since Commission Form PSC/AFD 19-W (11/93) incorporated by Rule 25-30.437 is being revised I would recommend that Schedule E-14 be amended to only require the billing analysis for the most recent rate change in the test year, instead of every change. The staff has acknowledged that only the billing analysis for the most recent rate change in the test year is necessary. This has been the subject of Rule Variance requests that have been granted by the Commission. PSC Order Nos. PSC-2016-0530-PAA-WS and PSC-2020-0211-PAA-WS. This change would reduce rate case expense and Commission staff time.

The financial impact of the proposed changes to reduce the number of paper copies reduces utility expense, and thus rate case expense. However, there is still substantial unnecessary expense of copies, binders and tabs for the ten MFR paper copies and two engineering paper copies, which expense is ultimately borne by the customers.

Should you or Staff have any questions regarding these comments, please do not hesitate to give me a call.

Very truly yours,

/s/ Martin S. Friedman
MARTIN S. FRIEDMAN
For the Firm

MSF/