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DANIEL PEREZ
Speaker of the House of Representatives

May 12, 2026

Ms. Susan Sapoznikoff, Senior Attorney
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: 20260036-OT PROPOSED AMENDMENT OF RULES 25-6.109, F.A.C., REFUNDS; 25-6.0435, F.A.C., INTERIM RATE RELIEF; 25-7.040, F.A.C., INTERIM RATE RELIEF; 25-7.091, F.A.C., REFUNDS; 25-30.1 17, F.A.C., ACCOUNTING FOR PENSION COSTS; AND 25-30.360, F.A.C., REFUNDS

Dear Ms. Sapoznikoff:

On March 24, 2026, the Florida Public Service Commission (“PSC” or “Commission”) issued its Notice of Development of Rulemaking regarding Amendment of Rules 25-6.109, F.A.C., Refunds; 25-6.0435, F.A.C., Interim Rate Relief; 25-7.040, F.A.C., Interim Rate Relief; 25-7.091, F.A.C., Refunds; 25-30.1 17, F.A.C., Accounting For Pension Costs; And 25-30.360, F.A.C., Refunds. By letter dated April 8, 2026, the Office of Public Counsel (“OPC”) requested a workshop on the proposed changes to the current Rule 25-30.117, F.A.C., Accounting For Pension Costs. By email dated April 23, 2026, the OPC forwarded the Commission Staff its proposed “type and strike” changes to Rule 25-30.117, F.A.C. in Docket No. 20260036-OT and to Rule 25-30.434, F.A.C. in Docket No. 20260040-OT. The purpose of this letter is to memorialize additional comments related to Rule 25-30.117, F.A.C., in the docket file for Docket No. 20260036-OT.

Given that Rule 25-30.117, F.A.C. is being updated to remove the old Statement of Financial Accounting Standards (SFAS 87) and replacing it with the Accounting Standards Codification (ASC) 715, the OPC would recommend that the following additional rules be amended since they also have outdated references to the former SFAS.

Rule 25-14.012, Accounting for Postretirement Benefits Other Than Pensions; 25-14.013, Accounting for Deferred Income Taxes Under SFAS 109; and 25-14.014, Accounting for Asset Retirement Obligations Under SFAS 143.

These rules should incorporate by reference the applicable corresponding ASC provisions as well. First, Rule 25-14.012 – Provision (1) references the old FSAS No. 106, and Provision (2) references the old SFAS No. 71. The old FSAS No. 106 has been replaced by ASC 715 which is the applicable corresponding ASC provision and the reason Staff is updating Rule 25-30.117, and the old FSAS No. 71 has been replaced by the corresponding ASC 980. Second, Rule 25-14.013 – Provisions (1), (3), (5), (10), (11), and (12) reference the old FSAS No. 109 which has been replaced by the applicable corresponding ASC 740. Third, Rule 25-14.014 – Provisions (1), (3), (6), (7), (8), and (9) reference the old FSAS No. 143 which has been replaced by the applicable corresponding ASC 410.

Consistent with the proposed rule amendment for Rule 25-30.117, F.A.C. to replace the old FSAS with the new ASC, the additional rules above should be amended as well along with any applicable Accounting Standard Updates to ASC provisions 410, 715, 740, and 980.

Respectfully submitted,

/s/ *Bart Fletcher*

Bart Fletcher
Legislative Analyst