

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:** May 14, 2026

**TO:** Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

**FROM:** Susan Sapoznikoff, Special Counsel, Office of the General Counsel 

**RE:** Docket No.: 20260038-OT; In re: Proposed Amendment of Rules 25-9.001, F.A.C., Application and Scope; 25-9.004, F.A.C., General Filing Instructions; 25-9.006, F.A.C., Size and Form of Tariffs; 25-9.007, F.A.C., Gas – Electric – Water-Wastewater Utility Tariffs; 25-9.009, F.A.C., Numbering and General Data Required for Each Sheet; 25-9.010, F.A.C., Numbering of Supplements and Additions; 25-9.021, F.A.C., Title Page; 25-9.023, F.A.C., Description of Territory Served; 25-9.029, F.A.C., Index of Rate or Exchange Schedules; 25-9.033, F.A.C., Standard Forms; 25-9.034, F.A.C., Contracts and Agreements, 25-9.045, F.A.C., Withdrawal of Tariffs; 25-9.051, F.A.C., Definitions; 25-9.054, F.A.C., Size and Form of Documentation; 25-9.055, F.A.C., Electric Utility Documentation; 25-9.061, F.A.C., Title Page; and 25-9.069, F.A.C., Standard Forms and Blank Bill Form.

---

Good afternoon:

Please place the attached documents from the Florida Electric Cooperative Association in the above-referenced docket.

Please contact me with any questions or concerns.

## Susan Sapoznikoff

---

**From:** Forrest Boone <forrest@feca.com>  
**Sent:** Friday, May 8, 2026 2:51 PM  
**To:** Susan Sapoznikoff  
**Subject:** Rule 25-9.034  
**Attachments:** Proposed 25-9.034.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good afternoon Susan,

In reviewing the proposed rule language for Rule 25-9.034 Contracts and Agreements we have identified an outdated reference to electric co-ops which merits a clerical change.

The draft revised rule references a "Rural Electric Administration cooperative" updating the previous rule language referring to an "R.E.A. cooperative." This federal agency within the United States Department of Agriculture has since been renamed. To avoid anachronism and unnecessary confusion we suggest referencing cooperatives based on Florida Law, a "cooperative organized under Chapter 425, F.S." Attached you will find this suggested clerical change in legislative format.

Thank you for your consideration of this suggestion. Please do not hesitate to contact me if you have any questions.

Sincerely,

**Forrest Boone**  
Director of Regulatory Affairs  
Florida Electric Cooperatives Assoc.  
2916 Apalachee Parkway  
Tallahassee, FL 32301  
Office: (850) 877-6166, ext. 3

NOTE: This e-mail is intended solely for the use of the individual(s) to whom it is addressed. The contents of this email and any attachments are confidential. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you properly received this e-mail you should maintain its contents in confidence.

1     **25-9.034 Contracts and Agreements.**

2     (1) ~~When~~ ~~Wherever~~ a utility enters a special contract ~~is entered into by a utility~~ for the sale  
3 of its product or services in a manner or subject to the provisions not specifically covered by  
4 its filed regulations and standard approved rate schedules, such contract must be approved by  
5 the Commission prior to its execution. ~~Accompanying each contract shall be~~ Completed and  
6 detailed justification for the deviation from the utility's filed regulations and standard  
7 approved rate schedules must accompany each such contract. If the Commission approves  
8 such special contracts ~~are approved by the Commission~~, a conformed copy of the contract  
9 must shall be placed on file with the Commission before its effective date.

10 The provisions of this rule must shall not apply to contracts or agreements governing the sale  
11 or interchange of commodity or product by or between a public utility and a municipality or  
12 ~~Rural Electric Administration (R.E.A.)~~ cooperative organized under Chapter 425, F.S.  
13 but must shall otherwise apply have application.

14     (2) Each utility must make provision to file with the Commission a conformed copy of all  
15 such special contracts which are currently in effect and which have not been previously filed.

16     (3) If the number and size of such special contracts warrant, they must may be placed in a  
17 separate binder.

18 *Rulemaking Authority 366.05(1), 367.121 FS. Law Implemented 366.05(1), 367.121 FS.*

19 *History—New 6-27-73, Repromulgated 1-8-75, Formerly 25-9.34.*