

# I. Meeting Packet



**State of Florida**  
**Public Service Commission**  
**INTERNAL AFFAIRS AGENDA**

Tuesday – June 09, 2020  
Immediately Following Agenda Conference  
Room 148 – Betty Easley Conference Center

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1. Draft comments to FERC regarding the Petition for Declaratory Order filed by NERA (Attachment 1)
2. General Counsel's Report
3. Executive Director's Report
4. Other Matters

BB/aml

OUTSIDE PERSONS WISHING TO ADDRESS THE COMMISSION ON ANY OF THE AGENDAED ITEMS SHOULD CONTACT THE OFFICE OF THE EXECUTIVE DIRECTOR AT (850) 413-6463.

## Attachment 1

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-**

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**DATE:** June 1, 2020

**TO:** Braulio L. Baez, Executive Director

**FROM:** Office of Industry Development and Market Analysis (Hinton, Vogel) *CH*  
Office of the General Counsel (Cibula, Harper) *SC*

**RE:** Draft comments to the Federal Energy Regulatory Commission regarding Petition for Declaratory Order of New England Ratepayers Association Concerning Unlawful Pricing of Certain Wholesale Sales.

**CRITICAL INFORMATION:** Please place on the June 9, 2020 Internal Affairs. Comments are due on June 15, 2020.

**COMMISSION APPROVAL OF COMMENTS IS SOUGHT**

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On April 14, 2020, the New England Ratepayers Association (NERA) filed a Petition for Declaratory Order with the Federal Energy Regulatory Commission (FERC). By its petition, NERA is requesting that FERC find that FERC, not state commissions, has exclusive jurisdiction over net metering. FERC has requested comments on NERA's petition by June 15, 2020. At the May 19, 2020 Internal Affairs meeting the Commission directed staff to draft comments for consideration.

Staff seeks Commission approval to intervene in the FERC docket and file written comments on NERA's petition. Attachment A provides draft comments for Commission consideration.

cc. Keith Hetrick, General Counsel  
Mark Futrell, Deputy Executive Director – Technical  
Apyrl Lynn, Deputy Executive Director – Administrative

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

New England Ratepayers Association

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Docket No. EL20-42-000

**FLORIDA PUBLIC SERVICE COMMISSION’S COMMENTS ON  
NEW ENGLAND RATEPAYERS ASSOCIATION’S PETITION FOR  
DECLARATORY ORDER**

Pursuant to notice issued in the above-referenced docket on May 4, 2020, by the Duty Secretary of the Federal Energy Regulatory Commission (“FERC”), the Florida Public Service Commission (“Florida Commission”) submits these comments on the New England Ratepayers Association’s (NERA) Petition for Declaratory Order filed on April 14, 2020. By its petition, NERA is requesting that FERC find that FERC, not state commissions, has exclusive jurisdiction over net metering.

The Florida Commission respectfully urges FERC to deny NERA’s petition. As illustrated below, state jurisdiction in this area is firmly rooted in law and history. FERC should decline NERA’s invitation to recede from its long-established precedent and infringe on state jurisdiction over net metering.

Net Metering Falls Within the Purview of State Jurisdiction

The Federal Power Act addresses FERC jurisdiction versus state jurisdiction:

It is declared that the business of transmitting and selling electric energy for ultimate distribution to the public is affected with a public interest, and that the Federal regulation of matters relating to the generation to the extent provided in this subchapter and subchapter III of this chapter and of that part of such business which consists of the transmission of electric energy in interstate commerce and the sale of such energy at wholesale in interstate commerce is necessary in the public interest, *such Federal regulation, however, to extend only to those matters which are not subject to regulation by the States.*

16 U.S.C. § 824(a) (emphasis added). While NERA argues net metering is “wholesale sales,” FERC established many years ago that net metering transactions are a retail service – a billing mechanism – within the exclusive jurisdiction of states and state commissions. FERC’s long-established precedent rests on the premise that the mere flow of power from a customer to the distribution grid does not provide a basis for FERC to assert federal jurisdiction over net metering.

In *MidAmerican Energy Company*, 94 FERC ¶ 61340 (2001), FERC found that no sale occurs under the Federal Power Act when an individual homeowner or similar business entity installs generation and accounts for its dealings with the utility through net metering. FERC stated that in implementing PURPA, it also recognized that net billing arrangements like those at issue in *MidAmerican Energy Company* could be appropriate in some situations and left the decision to state regulatory authorities. *Id.*

In *Sun Edison LLC*, 129 FERC ¶ 61146 (2009), FERC also addressed net metering<sup>1</sup> and upheld its decision in *MidAmerican Energy Company*. FERC found:

[FERC] does not assert jurisdiction when the end-use customer that is also the owner of the generator receives a credit against its retail power purchases from the selling utility. Only if the end-use customer participating in the net metering program produces more energy than it needs over the applicable billing period, and thus is considered to have made a net sale of energy to a utility over the applicable billing period, has [FERC] asserted jurisdiction.

*Southern Cal. Edison Co. v. Federal Energy Regulatory Commission*, 603 F.3d 996 (D.C. Cir. 2010), and *Calpine Corporation v. Federal Energy Regulatory Commission*, 702 F.3d 41

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<sup>1</sup>In the order, FERC described net metering as: “Net metering allows a retail electric customer to produce and sell power in the Transmission System without being subject to [FERC] jurisdiction. A participant in a net metering program must be a net consumer of electricity – but for portions of the day or portions of the billing cycle, it may produce more electricity than it can use itself. This electricity is sent back into the Transmission System to be consumed by other end-users. Since the program participant is still a net consumer of electricity, it receives an electric bill at the end of the billing cycle that is reduced by the amount of energy it sold back to the utility. Essentially, the electric meter “runs backwards” during the portion of the billing cycle when the load produces more power than it needs, and runs normally when the load takes electricity off the system.” *Id.*

(D.C. Cir. 2012), do not change FERC's holdings in *MidAmerican Energy Company* and *Sun Edison LLC*. Net metering transactions are considered retail services, and the law is clear that jurisdiction over retail services rests exclusively with states and state commissions.

#### Florida Activity Regulates Net Metering

The Florida Legislature exercised its authority over retail matters. For example, it has established numerous policies to encourage the development of renewable energy and to promote energy conservation in Florida. Among them, Section 366.91(5) and (6), Florida Statutes, enacted in 2008, require Florida electric utilities to develop a standardized interconnection agreement and net metering program for customer-owned renewable generation.

Section 366.91(2)(c), Florida Statutes, and Rule 25-6.065, Florida Administrative Code, define net metering as “a metering and billing methodology whereby customer-owned renewable generation is allowed to offset the customer's electricity consumption onsite.” Customer-owned renewable generation is defined in statute and rule as “an electric generating system located on a customer's premises that is primarily intended to offset part or all of the customer's electricity requirements with renewable energy.” These definitions make clear that customer-owned renewable generation primarily acts as a conservation measure that reduces a customer's load that must be served by the electric utility.

The rule, which is applicable to investor-owned utilities, establishes a billing mechanism that allows customers to offset their usage through the self-generation of energy, with any excess energy delivered to the grid being applied as a kilowatt-hour credit to the customer's monthly energy usage. At the end of the calendar year, the investor-owned utility pays for any remaining unused energy credits at its as-available energy rate.

As of year-end 2019, 59,508 customers in Florida have installed renewable generation systems and interconnected to their utility in order to net meter. Ninety percent of these customer-owned renewable facilities are 10 kW or smaller and are largely comprised of systems installed by residential homeowners. For all its discussion of law and policy, the practical impact of NERA's petition would be for FERC to insert itself into the relationship between a homeowner and their utility, which is well-established as a retail relationship under the jurisdiction of the states.

Granting NERA's petition would have a drastic effect on the retail service relationship. For example, small solar photovoltaic systems on the roof of a house, which may deliver energy to the grid at some point during the day, would be treated the same as facilities purposefully built to function as PURPA qualifying facilities or other Federal Power Act jurisdictional wholesale generators. These homeowners did not install energy generation systems on their premises in order to sell energy to a utility; rather, these homeowners invested in self-generation facilities to be more self-reliant and to decrease the amount of energy purchased from the utility.

As the entities charged with regulating the retail relationship between electric utilities and their customers, the Florida Legislature and the Florida Commission are in the best position to regulate net metering in Florida and determine the net metering policy for our State.



Conclusion

The Florida Commission respectfully urges FERC to deny NERA's petition.

Respectfully submitted,

/s/

Office of the General Counsel

FLORIDA PUBLIC SERVICE COMMISSION

2540 Shumard Oak Boulevard

Tallahassee, Florida 32399-0850

(850) 413-6199

Email address

DATED: (filing date)

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

New England Ratepayers Association ) Docket No. EL20-42-000

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing document upon the parties identified on the Commission's official service list compiled by the Secretary in this proceeding.

Dated at Tallahassee, Florida, this (filing date) day of June 2020.

/s/  
Office of the General Counsel

FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
(850) 412-6199  
Email address

# III. Supplemental Materials for Internal Affairs

Note: The records reflect that there were no supplemental materials provided to the Commission during this Internal Affairs meeting.

# IV. Transcript

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

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PROCEEDINGS: INTERNAL AFFAIRS

COMMISSIONERS PARTICIPATING: CHAIRMAN GARY F. CLARK  
COMMISSIONER ART GRAHAM  
COMMISSIONER JULIE I. BROWN  
COMMISSIONER DONALD J. POLMANN  
COMMISSIONER ANDREW GILES FAY

DATE: Tuesday, June 9, 2020

TIME: Commenced: 1:15 p.m.  
Concluded: 1:31 p.m.

PLACE: Gerald L. Gunter Building  
Room 105  
2540 Shumard Oak Boulevard  
Tallahassee, Florida

REPORTED BY: DEBRA R. KRICK  
Court Reporter and  
Notary Public in and for  
the State of Florida at Large

PREMIER REPORTING  
114 W. 5TH AVENUE  
TALLAHASSEE, FLORIDA  
(850) 894-0828

## 1 P R O C E E D I N G S

2 CHAIRMAN CLARK: All right. We will call IA  
3 to order for the day. We have a few items on the  
4 agenda today. Item No. 1 are the draft comments to  
5 FERC regarding the petition for the declaratory  
6 order filed by NERA. And, Mark, would you like to  
7 address for us?

8 MR. FUTRELL: Yes, sir. Thank you, Mr.  
9 Chairman.

10 Good afternoon, Commissioners. Mark Futrell  
11 with staff. I will just do a quick introduction  
12 and then we have our other staff on the line to  
13 answer more questions.

14 Commissioners, at the May 19th Internal  
15 Affairs meeting, you directed the staff to prepare  
16 draft comments to the Federal Energy Regulatory  
17 Commission regarding the petition for declaratory  
18 order by the New England Ratepayers Association, or  
19 NERA.

20 The draft comments in Attachment A urge the  
21 FERC to deny the petition as NERA invites the FERC  
22 to infringe on the exclusive authority of the  
23 Florida Legislature and this commission to regulate  
24 retail electric service in the rates of  
25 investor-owned utilities. Specifically, NERA would

1           have the FERC establish policies governing the  
2           treatment of excess energy from customer-owned  
3           renewable generating equipment known as net  
4           metering.

5           The Florida Legislature has established  
6           policies regarding net metering and interconnection  
7           of customer-owned renewable equipment, and this  
8           commission has adopted rules that implement those  
9           policies.

10          Staff seeks your approval to intervene in the  
11          FERC proceeding in order to preserve the  
12          Commission's appellate rights. Staff also seeks  
13          approval to file the comments by the June 15th  
14          deadline.

15          Casey Hinton, Adria Harper and Samantha Cibula  
16          are available on the phone for questions.

17          CHAIRMAN CLARK: Thank you, Mr. Futrell.

18          I want to say thank you to staff for working  
19          diligently to get this put together. This was  
20          something that kind of came up last minute, short  
21          notice, and we had a pretty intense deadline to get  
22          our response together.

23          There is one section in the response that I  
24          would like to address, and like to ask staff to  
25          consider let's actually removing this section. If

1           you look on page four in the second paragraph, the  
2           last sentence in that paragraph states: These  
3           homeowners did not install energy generation on  
4           their premises in order to sell energy to a  
5           utility; rather, they were invested in  
6           self-generation facilities to be more reliant and  
7           decrease the amount of energy purchased from the  
8           utility.

9           While part of that sentence may actually be  
10          true, I -- I don't want to presuppose that some  
11          customers did not install strictly for the purpose,  
12          and that would certainly not take away the right to  
13          do so, but I -- I think that statement might be a  
14          little bit misleading. I am afraid that could  
15          cause us some issues at some point in time. So I  
16          would like to ask for that sentence to be removed,  
17          unless someone sees a real reason why it shouldn't.

18                 COMMISSIONER FAY: I agree.

19                 COMMISSIONER POLMANN: I concur, Mr. Chairman.

20                 CHAIRMAN CLARK: All right. Commissioners,  
21          everybody has had a chance to look it over. Any  
22          other comments or questions?

23                 Commissioner Polmann, your light is on.

24                 COMMISSIONER POLMANN: I just want to concur  
25          with your observation. I don't -- I don't want to



1 try to characterize the motivation for --

2 CHAIRMAN CLARK: Okay. Thank you.

3 Commissioner Brown.

4 COMMISSIONER BROWN: Thank you.

5 I think the draft comments are succinctly  
6 sufficient to rely on law and precedence in support  
7 of our proposition to keep and retain our state's  
8 efforts and policy needs and jurisdiction.

9 You know, some of the other state commissions  
10 have already opined and commented, NARUC has as  
11 well. Having homogenous regulation at the federal  
12 level of net metering is -- could be stifling,  
13 really. Especially, as so many other consumers are  
14 shifting to rooftop solar, I think we, at Florida,  
15 know what's best to be able to -- (inaudible) --  
16 certain net metering issues like cost shifting, for  
17 example, and it's important that we retain that  
18 jurisdiction, and these comments are very legally  
19 based, so I -- I appreciate that.

20 I am hopeful FERC will also agree with us, the  
21 intended purposes behind PURPA, and be really  
22 looking to see what happens with this docket.

23 Does anybody, Mark, Adrai, Samantha, does  
24 anybody know who this NERA company -- organization  
25 is?

1           MR. FUTRELL: Commissioner Brown, this is  
2 Mark.

3           I have done a little -- tried do a little  
4 internet research myself and read as much as I  
5 could, and it's -- it's a bit a unknown as to  
6 exactly who is behind this group, and supporting it  
7 and funding it. They certainly, obviously, have  
8 connections in -- in the northeast, and it does  
9 appear they are more active in New Hampshire, for  
10 example, but it is a bit of a shadowy organization.

11           COMMISSIONER BROWN: That's -- look, that's  
12 the exact word, shadowy. And -- and it's  
13 concerning.

14           Do we know what the timeframe is for FERC to  
15 take this under consideration after the comments  
16 are due? I know and they -- they extended it just  
17 30 days, so what's -- what's the process  
18 thereafter?

19           MR. FUTRELL: Perhaps Samantha --

20           MS. CIBULA: This is Samantha Cibula. This is  
21 Samantha Cibula.

22           I don't think there is a timeframe, but I  
23 guess they have asked for expedited review of the  
24 petition. And it seems like since FERC didn't  
25 get -- NARUC asked for a 90-day extension of time,

1 and that wasn't granted. Instead, a 30-day  
2 extension of time is granted instead. So I am  
3 guessing that they are going to move quickly on it.

4 COMMISSIONER BROWN: Do you know if any of to  
5 the Florida utilities have filed comments on this  
6 petition relief?

7 MS. CIBULA: We have been monitoring that and  
8 we have not seen any Florida utilities filing  
9 comments on it.

10 COMMISSIONER BROWN: Have any other electric  
11 utilities filed any comments whatsoever?

12 MS. CIBULA: I don't think any electric  
13 utilities have, but I am not 100 percent sure of  
14 that. There have been other state commissions, as  
15 we -- as we told you at the last Internal Affairs,  
16 but I don't think any electric companies have, but  
17 I am not positive about that.

18 COMMISSIONER BROWN: You know, it's definitely  
19 an active -- a nationally active docket that folks  
20 across the spectrum are watching, so looking  
21 forward to hearing how this unfolds.

22 CHAIRMAN CLARK: Thank you, Commissioner  
23 Brown.

24 And -- and for the -- those of you who may  
25 have missed it, there was an article, I believe in

1 the Bradenton news this morning that did discuss  
2 the fact that NERPA had not disclosed its  
3 membership base, and that were being compelled to  
4 do so, or being requested to do so by the other  
5 intervenors to FERC right now. So there was a lot  
6 of questions about them being a trade association  
7 and the requirement to disclose that membership, so  
8 interesting article.

9 Other questions?

10 Commissioner Polmann.

11 COMMISSIONER POLMANN: Thank you, Mr.

12 Chairman.

13 I -- I understand what's being requested of  
14 the Commission are two things here. The first page  
15 is a memorandum, the last paragraph seeks approval  
16 to intervene in the docket and to file the comments  
17 attached to the item. So a question just for --  
18 from a legal standpoint, what is involved? What --  
19 what constitutes the intervention?

20 CHAIRMAN CLARK: Mr. Hetrick or --

21 MS. CIBULA: This is Samantha.

22 CHAIRMAN CLARK: Samantha, I am sorry.

23 MS. CIBULA: We just have a file -- we just  
24 have to file a notice of intervention. It's --  
25 it's pretty boilerplate. So we will have to do

1           that, and then once we do that, we can file the  
2           comments.

3           COMMISSIONER POLMANN:   Okay.   So in order --  
4           in order to file comments, we need to intervene?

5           MS. CIBULA:   Yes, correct.

6           MR. BAEZ:   Commissioner, just to clarify, as  
7           a -- as a state agency, we have -- we have  
8           intervention by right, which is why Samantha  
9           mentioned it's just a notice that we're getting  
10          involved.

11          CHAIRMAN CLARK:   Okay.

12          COMMISSIONER POLMANN:   Thank you.

13          CHAIRMAN CLARK:   Any other questions or  
14          comments from Commissioners?

15          All right.   With your concurrence, we will ask  
16          staff to send the letter with the proposed  
17          modification to it.   I see no objection, so we will  
18          make it so.

19          All right.   Moving to Item No. 2, General  
20          Counsel's report.   Mr. Hetrick.

21          MR. HETRICK:   No report, Mr. Chair.

22          CHAIRMAN CLARK:   Thank you, Mr. Hetrick.

23          Mr. Baez, Executive Director's report.

24          MR. BAEZ:   Thank you, Mr. Chairman.

25          I guess good afternoon, Commissioners.   I have

1           some brief updates. Before I do that, I want to,  
2           as always, given the opportunity, extend my  
3           personal thanks to all of our --

4                   UNIDENTIFIED SPEAKER: Hello.

5           MR. BAEZ: -- staff out there, and for the  
6           work that they are doing. As -- as you know, all  
7           of this goes off pretty seamlessly because of them,  
8           and -- and I want to thank them myself.

9                   And I also want to give a special shout-out,  
10          which I always -- I always forget to do, to the  
11          folks out in the district offices because they  
12          don't -- they don't get our acknowledgment enough.

13                   As you know, we have offices down in Miami and  
14          in Tampa, and they are -- they have had perhaps a  
15          more intense firsthand experience with -- with the  
16          pandemic that has kept all of us working remotely,  
17          and they are as well, so I wanted to -- to  
18          acknowledge them at this point.

19                   Commissioners, I only -- I have a very quick  
20          update on -- on the legislative front. We  
21          currently have two of -- two bills of impact to the  
22          PSC that are on the Governor's desk, and they --  
23          and they both coincidentally have a deadline of  
24          tomorrow for the Governor to sign. Those bills  
25          being House 1339, which if you recall had some, I

1 would call it glitch language on mobile home water  
2 and wastewater service regulation, that's before  
3 the -- that's on the Governor's desk currently.  
4 And then finally, Senate 7018, which, as you know,  
5 the EV bill. And again, we -- we await Governor's  
6 action, whatever it might be, come tomorrow.

7 On the EV -- on the EV matter, we are also --  
8 our -- our senior staff is getting on a -- has a  
9 conference call with FDOT later this afternoon, at  
10 which point they will be discussing preliminaries  
11 in -- in anticipation of the legislation becoming  
12 finalized. And we will, as always, keep you  
13 updated on that progress, and we welcome your  
14 questions -- any questions and thoughts on that as  
15 well.

16 CHAIRMAN CLARK: All right.

17 MR. BAEZ: That's it, Mr. Chairman. Thank  
18 you.

19 CHAIRMAN CLARK: Thank you very much.

20 Any questions for our Executive Director?

21 Okay. Any Commissioner have any other matter  
22 to come before us in IA today?

23 Commissioner Polmann.

24 COMMISSIONER POLMANN: Thank you, Mr.  
25 Chairman.

1           I appreciate, as you said the -- (inaudible)  
2           -- water association -- (inaudible) -- and I guess  
3           a general question -- (inaudible) -- staff has any  
4           response on how they intend to proceed on those. I  
5           think that was excellent presentation, a great  
6           opportunity for us to engage and get some useful  
7           information.

8           So not to press the issue too hard, but I  
9           enjoy that, and I find it very informative, and I  
10          encourage the Commission to continue having those  
11          subject matter items. I know we had a little bit  
12          of discussion in reference to that on our  
13          technology, on the FTRI item earlier today, so just  
14          a comment here in the IA meeting that I am looking  
15          forward to -- to having additional opportunity on  
16          that.

17          So thank you, Mr. Chairman.

18          CHAIRMAN CLARK: Thank you, sir.

19          MR. BUTLER: Oh, I am not sure if Commissioner  
20          Polmann was asking a question as to what -- what's  
21          going on. I can give him a very brief update if --  
22          if you wish.

23          CHAIRMAN CLARK: Certainly.

24          MR. BAEZ: Commissioners, we -- we are --  
25          right now I have on my plate a draft agenda of --



1           that -- that kind of consolidates or collects all  
2           of the issues, not just those that were -- we were  
3           kind of moving forward on inde-- independent of the  
4           discussion at the last IA, but also the issues  
5           specifically that you all discussed at -- at that  
6           IA, and -- and we are finalizing that draft agenda.

7           And what our current -- how we are proceeding  
8           currently, Commissioners, is hopefully at -- at  
9           some point later in the summer -- and I want to --  
10          I don't want to jump the gun here. It could be in  
11          August or maybe -- or even in -- or even in July if  
12          we can -- if we can get it -- pull it together fast  
13          enough to present -- we keep calling it internally  
14          a water day concept, so -- so that -- so that we  
15          can have you all's time and -- and kind of put all  
16          the issues on the table and have a discussion about  
17          where we see -- you know, how we may see things  
18          and -- and to get your thoughts on where the --  
19          where the difficulties lay and -- and have a --  
20          have an airing of those according to your  
21          interests, and maybe we will come out with  
22          better -- better direction. Although, I don't want  
23          to say that to put anyone on the spot, but  
24          certainly a better idea of what the next step ought  
25          to be, and how we should be approaching any given

1 issue accordingly.

2 So -- so that's our intent at this point. I  
3 think whether it's -- whether it's a July or an  
4 August date, our -- that -- that vision will become  
5 a lot more definite in the next couple of weeks.

6 So that's where we are at there, Commissioner.  
7 And if you have any questions, please feel free to  
8 reach out, or -- or if we can answer anything --  
9 any question you might have now, would be happy to.

10 CHAIRMAN CLARK: All right. Thank you very  
11 much.

12 Any other matters from any Commissioner?

13 Yes, Commissioner Graham.

14 COMMISSIONER GRAHAM: Yes, Mr. Chairman, are  
15 we going to make the announcement that the  
16 prehearing is going to start 15 minutes after this  
17 meeting?

18 CHAIRMAN CLARK: Yes, sir. That was next on  
19 my list.

20 COMMISSIONER GRAHAM: Okay.

21 CHAIRMAN CLARK: In due fashion, Commissioner  
22 Graham's prehearing will start in 15 minutes  
23 concluding this meeting today.

24 Seeing no further business, we stand  
25 adjourned.

1                   Have a great day. Thank you all for being  
2                   here.

3                   (Proceedings concluded at 1:31 p.m.)

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CERTIFICATE OF REPORTER

STATE OF FLORIDA )  
COUNTY OF LEON )

I, DEBRA KRICK, Court Reporter, do hereby  
certify that the foregoing proceeding was heard at the  
time and place herein stated.

IT IS FURTHER CERTIFIED that I  
stenographically reported the said proceedings; that the  
same has been transcribed under my direct supervision;  
and that this transcript constitutes a true  
transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative,  
employee, attorney or counsel of any of the parties, nor  
am I a relative or employee of any of the parties'  
attorney or counsel connected with the action, nor am I  
financially interested in the action.

DATED this 15th day of June, 2020.



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DEBRA R. KRICK  
NOTARY PUBLIC  
COMMISSION #GG015952  
EXPIRES JULY 27, 2020