

Diamond Williams

100459-EI

From: Rhonda Dulgar [rdulgar@yvlaw.net]
Sent: Thursday, March 24, 2011 4:18 PM
To: Frank Bondurant; Beth Keating; J.R. Kelly; Cecilia Bradley; Filings@psc.state.fl.us; Jennifer Crawford; Katherine Fleming; Schef Wright
Subject: Electronic Filing - Docket 100459-EI
Attachments: 100459.Marianna.Resp2MTD.3-24-11.pdf

a. Person responsible for this electronic filing:

Robert Scheffel Wright
 Young van Assenderp, P.A.
 225 South Adams Street, Suite 200
 Tallahassee, FL 32301
 (850) 222-7206
swright@yvlaw.net

b. 100459-EI

In Re: Petition for authority to implement a Demonstration Project consisting of proposed Time-of-Use and Interruptible rate schedules and corresponding fuel rates in the Northwest Division.

c. Document being filed on behalf of the City of Marianna, Florida.

d. There are a total of 15 pages.

e. The document attached for electronic filing is The City of Marianna's Response in Opposition to Motion to Dismiss.

(see attached file: 100459.Marianna.Resp2MTD.3-24-11-11.pdf)

Thank you for your attention and assistance in this matter.

Rhonda Dulgar
 Secretary to Schef Wright
 Phone: 850-222-7206
 FAX: 850-561-6834

3/24/2011

DOCUMENT NUMBER-DATE

01968 MAR 24 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Florida Public Utilities Company's Petition for)
Authority to Implement a Demonstration Project of)
Proposed Time-of-Use and Interruptible Rate Schedules)
In the Northwest Division)
_____)

DOCKET NO. 100459-EI

Filed: March 24, 2011

THE CITY OF MARIANNA'S RESPONSE IN OPPOSITION TO MOTION TO DISMISS

The City of Marianna, Florida ("Marianna" or "City"), pursuant to Rule 28-106.204(1), Florida Administrative Code ("F.A.C."), hereby files its response in opposition to the motion to dismiss ("Motion to Dismiss") the City's Petition for Formal Proceeding filed by Florida Public Utilities Company ("FPUC") on March 17, 2011. In summary, contrary to FPUC's assertions, the City has pled sufficient facts to establish its standing, namely that it is a customer of FPUC eligible to take service under all but one of the rate schedules that the City opposes in this proceeding, and the City has plainly stated a claim upon which relief can be granted, namely that the rates for which the City is eligible are not fair, just, and reasonable because they are not cost-based, and that the Commission has the jurisdiction, authority, and mandate to deny those rates accordingly. With regard to FPUC's assertion that the City's Petition for Formal Proceeding ("Petition") is somehow premature, the City responds (a) that there is a present factual dispute as to whether the rates that are now in effect are appropriately cost-based, fair, just, and reasonable, and (b) that FPUC's argument would vitiate the specific provision of the Commission's Order No. PSC-11-0112-TRF-EI that expressly provides substantially affected persons, such as the City, the opportunity for a formal proceeding. Taking the allegations in the City's Petition for Formal Proceeding as true, the City has pled sufficient facts to establish its standing and to state a claim upon which the Commission has the legal authority to grant the requested relief, and accordingly, FPUC's Motion to Dismiss must be denied.

DOCUMENT NUMBER-DATE

01968 MAR 24 =

FPSC-COMMISSION CLERK

If the Commission believes that the City should provide more detailed explanation of how the City's interests are affected by the Commission's actions herein, and of how the statutes cited relate to the facts alleged by the City, the City respectfully asks for leave to amend its Petition for Formal Proceeding to provide such desired explanation.

In further support of its rights to a timely formal proceeding in this docket, the City of Marianna states as follows.

BACKGROUND

1. This docket was initiated by FPUC's filing, on December 14, 2010, its petition for approval of certain time-of-use ("TOU") and interruptible service ("IS") rates on a pilot, experimental, or demonstration program basis. This pleading is referred to hereinafter at "FPUC's TOU/IS Rates Petition."

2. The City believes that it is undisputed that the only reason that FPUC filed its proposed TOU and IS rate schedules is that FPUC is required, by a contractual obligation to the City pursuant to its franchise agreement with the City, to have TOU and IS rates in effect by February 17, 2011. See Order No. PSC-0112 at 2, 6; and FPUC's TOU/IS Rates Petition at 2. In other words, this docket exists only because of FPUC's contractual obligation to the City to implement TOU and IS rates.

3. The City petitioned to intervene in this docket on January 7, 2011, and the Commission granted the City's intervention by Order No. PSC-11-0129-PCO-EI on February 25, 2011. FPUC did not oppose the City's intervention, nor did FPUC seek reconsideration of the Commission's Order granting the City party status in this docket. On January 24, 2011, the City also filed its Preliminary Statement of Issues and Positions, which the Commission Staff and the Commission itself considered in these proceedings; this is relevant because this Preliminary

Statement also served to put FPUC on notice of at least the City's preliminary concerns and positions regarding its TOU and IS rates.

4. The Commission issued its Order No. PSC-11-0112-TRF-EI, "Order Approving Time-of-Use and Interruptible Experimental Pilot Program" (hereinafter "Order No. 11-0112") on February 11, 2011. Order No. 11-0112 specifically states that the Commission's decision is "interim in nature" and provides the opportunity for "a person whose substantial interests are affected by the proposed action" to file a petition for a formal proceeding. Order No. 11-0112 at 8. Following these provisions in Order No. 11-0112, the City timely filed its Petition for Formal Proceeding on March 1, 2011.

5. In a separate petition filed on January 26, 2011, FPUC also initiated PSC Docket No. 110041-EI, In Re: Petition for Approval of Amendment No. 1 to Generation Services Agreement with Gulf Power Company, by Florida Public Utilities Company. In that petition, FPUC stated the following: "FPUC determined that, in order to develop TOU and Interruptible rates that would satisfy the requirements of the Franchise and also comply with Commission regulatory requirements, changes to the existing PPA with Gulf would be necessary." The TOU and IS rates proposed by FPUC depend on the PPA Amendment being approved by the PSC. The PSC's initial and preliminary consideration of the PPA Petition is presently scheduled to be considered as a "proposed agency action" item at an agenda conference to be held on May 24, 2011. The City opposes the proposed PPA Amendment, and the City has accordingly been granted intervention in PSC Docket No. 110041-EI, which the PSC opened for the purpose of evaluating the PPA Amendment. The City has advised the Commission that it believes that this new Docket No. 110041-EI and the existing Docket No. 100459-EI should be consolidated. City's Petition for Formal Proceeding at 4.

6. FPUC timely filed its Motion to Dismiss on March 17, 2011, and the City hereby responds in opposition to that motion.

SUMMARY OF ARGUMENT

7. FPUC's Motion to Dismiss the City's Petition for Formal Proceeding raises three points. First, FPUC asserts that the City has not adequately *pled facts to establish its standing*. Second, FPUC asserts that the City has not stated a claim upon which the Commission can grant relief. Finally, FPUC asserts that the City's Petition for Formal Proceeding is premature, as the Commission has stated that it will evaluate FPUC's TOU and interruptible fuel charges as part of the Commission's on-going fuel clause hearings.

8. Perhaps obviously, the City disagrees with each of FPUC's contentions. In considering – as it must¹ – all facts pled by the City as true, the Commission should conclude that the City has pled facts that are sufficient to establish its standing, to warrant the relief requested, and to justify proceeding to a timely hearing.

¹ A motion to dismiss challenges the legal sufficiency of the facts alleged in a petition to state a cause of action. In re: Petition for Approval of Negotiated Purchase Power Contract with FB Energy, LLC by Progress Energy Florida, Docket No. 090372-EQ, Order No. PSC-10-0685-FOF-EQ at 2 (citing Meyers v. City of Jacksonville, 754 So. 2d 198, 202 (Fla. 1st DCA 2000)). The standard of review for a motion to dismiss is whether, taking all facts pled in the petition of which dismissal is sought as true, the petition states a claim sufficient to proceed. Varnes v. Dawkins, 624 So. 2d 349, 350 (Fla. 1st DCA 1993).

I. The City of Marianna Has Pled Facts Sufficient to Establish Its Standing.

9. The City has alleged facts sufficient to establish its standing, namely that it is a customer of FPUC, that the City is eligible to take service under 4 of the 5 proposed rate schedules,² and that the rates are not fair, just, and reasonable because they are not cost-based. These facts establish (a) that the City is directly and substantially affected by the Commission's approval of TOU and IS rates – rates that only exist because of FPUC's effort (inadequate in the City's opinion) to comply with its contractual obligation to the City – because the City is a customer eligible for service under the TOU and IS rates, and (b) that, again assuming the City's allegations to be true, the City is presently being injured, in fact, because it cannot have access to appropriate, cost-based, fair, just, and reasonable TOU and IS rates. Moreover, the challenged rates are presently in effect, per Order No. 11-0112, which obviously makes the City's alleged injury immediate. Accordingly, the City's allegations satisfy the standing requirements of Agrico Chemical Co. v. Department of Environmental Regulation, 406 So. 2d 478 (Fla. 2d DCA 1981), rev. denied, 415 So. 2d 135 (Fla. 1982).

10. Of course, the City has already been found by Commission Order No. PSC-11-0129-PCO-EI, to have standing in this docket. FPUC did not object to the City's petition to intervene and did not seek reconsideration of the Commission's Order granting the City's intervention. (The Commission has also granted the City's petition to intervene in Docket No. 110041-EI, by Order No. PSC-11-0137-PCO-EI. FPUC did not object to the City's petition to

² The City is eligible for service under Rate Schedules GST-EXP, GSDT-EXP, GSLDT-EXP, and IS-EXP. The City agrees with FPUC that the City does not receive residential service and accordingly that it is not eligible for service under FPUC's proposed RST-EXP rate schedule, and the City does not purport or claim to represent residential customers in this proceeding. In its Petition for Formal Proceeding, the City specifically pled that "[t]he City of Marianna is a substantial customer of FPUC," and that the "City has several electric service accounts through which it purchases retail electric service from FPUC." The City also pled, in its Petition for Formal Proceeding, that, "[a]s a customer of FPUC, the City would have the option of taking service under these rate schedules." Petition for Formal Proceeding at 1, 3.

intervene in that docket, either, nor did FPUC seek reconsideration of the Commission's Order.) While the City might be required to prove facts sufficient to establish its standing in a formal hearing,³ the City believes that FPUC's assertions here that the City does not have, or has not adequately pled, standing are misplaced.

11. Moreover, FPUC's assertion that the City cannot show injury because the TOU and IS rates are optional, Motion to Dismiss at 9, para. 18, is misplaced. The City's injury is exactly what the City has pled: the rates are not fair, just, and reasonable because they are not cost-based and do not reflect either (a) the value that customers will provide by shifting their energy consumption to time periods when, presumably under normal time-of-use rates, the cost to serve would be less, or (b) the value that customers would provide by being interruptible. Petition for Formal Proceeding at 6-7. The City, like any customer, is entitled to have access to all of a utility's rates (for which the customer is otherwise eligible) on a non-discriminatory basis, and those rates must satisfy the statutory requirements that they must be fair, just, and reasonable. In this particular instance, since it was and is the City's bargain with FPUC that has produced FPUC's proposals (opposed here by the City for the reasons stated in the Petition for Formal Proceeding), it is particularly clear that the City has standing to challenge the rates, although any other customer would have the same legal standing to do so.

12. In essence, FPUC's position is that a customer who is merely eligible for service under optional rates cannot have standing to challenge those optional rates. This notion is facially inconsistent with the Commission's inherent regulatory mission, articulated at several places in the Statutes, to ensure that rates are fair, just, and reasonable, and would turn the Commission's long-standing precedent that customers have standing to challenge utility rates on

³ There is some doubt about this proposition in the present circumstances because FPUC did not object to the City's intervention and did not move for reconsideration of the Order Granting Intervention.

its head. For example, Section 366.03, Florida Statutes, provides that "All rates and charges . . . shall be fair and reasonable." Section 366.04(1), Florida Statutes, similarly recognizes the Commission's function "[i]n fixing the just, reasonable, and compensatory rates, charges," Section 366.05(1), Florida Statutes, provides that "the commission shall have power to prescribe fair and reasonable rates and charges" Section 366.06(1), Florida Statutes, provides that "the commission shall have the authority to determine and fix fair, just, and reasonable rates that may be requested, charged, or collected by any public utility for its service," and that, "[i]n fixing fair, just, and reasonable rates for each customer class, the commission shall, to the extent practicable, consider the cost of providing service to the class, as well as the . . . value of service" And Section 366.07, Florida Statutes, provides that whenever "the commission . . . shall find he rates, rentals, charges or classifications . . . are unjust, unreasonable, . . . , the commission shall determine and by order fix the fair and reasonable rates, rentals, charges . . . to be imposed, observed, furnished or followed in the future." (Emphasis supplied.)

13. In short, it doesn't matter whether a proposed rate is optional: even an optional rate must be fair, just, and reasonable. Moreover, it doesn't matter that an eligible customer does not have to take service under a challenged tariff; what matters is that the customer is in fact eligible for that service, which gives rise to the customer's standing to request a formal hearing to ensure either that the rates are fair, just, and reasonable, or that they are not approved.

14. Further, contrary to FPUC's assertion that by allegedly bringing its Petition for Approval under Section 366.075, Florida Statutes, it has somehow escaped the requirement that its rates be cost-based, Motion to Dismiss at 14, this statute provides no exception for experimental rates to the basic statutory requirements, nor any prohibition against the Commission considering all of the factors set forth in Section 366.041, Florida Statutes, and

other applicable provisions of the Statutes. Accordingly, the City's claims that the rates must be fair, just, and reasonable, and that the Commission must at least consider cost and value in making any determination regarding the rates, are well-founded, and the City is entitled to the formal proceeding that it has requested.

**II. The City of Marianna Has Stated a Claim Upon Which
the Commission Can Grant Relief.**

15. The City has also alleged facts that, if true, are sufficient to form the basis for the Commission to grant relief, including the City's requested relief of denying FPUC's rate proposals. Specifically, and concisely, the City has alleged that the proposed rates are not fair, just, and reasonable because those rates are not cost-based, Petition for Formal Proceeding at 6-7, and because they "do not reflect the value that customers will create by modifying their consumption, either by shifting their times of use or by being interrupted," Petition for Formal Proceeding at 7. That rates should be cost-based is a fundamental principle of ratemaking, long recognized by the Commission and frequently embodied in the maxim, "cost causer pays." Indeed, while exceptions may exist, the simple fact is that, if rates are not cost-based, and the utility is still collecting its full revenue requirement, then some customers are overpaying relative to their cost responsibility while others, who are underpaying, are being subsidized. The Commission generally, and rightly, regards inter-class subsidization as unfair, unjust, and unreasonable. See also, Section 366.06(1), Florida Statutes: "In fixing fair, just, and reasonable rates for each customer class, the commission shall, to the extent practicable, consider the cost of providing service to the class, as well as the . . . value of service"

16. The Commission has the statutory authority and mandate to grant the relief requested: Section 366.04(1), Florida Statutes, provides that the Commission has "jurisdiction to regulate and supervise each public utility with respect to its rates and service." Section 366.041,

Florida Statutes, provides that "the commission is authorized to give consideration, among other things, to . . . the cost of providing such service and the value of such service to the public." Section 366.06(1), Florida Statutes, directs the Commission to consider the cost of providing service, as follows: "In fixing fair, just, and reasonable rates for each customer class, the commission shall, to the extent practicable, consider the cost of providing service to the class, as well as the . . . value of service . . ." Relative to this provision, the City specifically alleged the following in its Petition for Formal Proceeding at 7: "The rates proposed by FPUC are not cost-based and do not reflect the value that customers will create by modifying their consumption, either by shifting their times of use or by being interrupted, and accordingly, the cited statutes warrant denial of FPUC's proposed TOU and IS rates." This allegation provides an entirely sufficient explanation of the relation of the cited statutes to the relief requested.

17. Moreover, in terms of having a case that is ripe to proceed to an evidentiary hearing, it is clear and inarguable that there is a real, present factual dispute as to whether the TOU and IS rates that the Commission has approved, and that are now in effect, albeit on an interim basis per Order No. 11-0112, are cost-based.

18. The City has stated a claim upon which relief can be granted: that FPUC's TOU and IS rates, which are presently in effect, are not fair, just, and reasonable because they are not cost-based, that the City is eligible for service under 4 of the 5 TOU and IS rate schedules, and that the Commission has the statutory jurisdiction and authority to grant the relief requested. Accordingly, FPUC's Motion to Dismiss must be denied.

III. The Issues Raised in the City's Petition for Formal Proceeding Are Fully Ripe for a Timely Hearing Because the Challenged Rates Are Already in Effect.

19. Contrary to FPUC's assertions that the issues raised by the City's Petition for Formal Proceeding are premature for a hearing, the matters at issue here are fully ripe for a timely hearing because there is a present factual dispute regarding the challenged rates, which are already in effect. The injury alleged by the City is simply this: the City is eligible for fair, just, and reasonable time-of-use and interruptible rates, but the rates that the Commission has approved, albeit on an interim basis, are not fair, just, and reasonable because they do not reflect either the cost or the value associated with time-of-use or interruptible service. The City is thus being deprived of fair, just, and reasonable rates and is entitled to a hearing to vindicate its interests. This is a present, current, real-time, ongoing injury. The longer the rates continue in effect, and the longer the time before the situation is remedied, the longer and the greater will be the City's injury, and the City is accordingly entitled to the requested hearing on a timely basis.

20. A timely hearing is required here because there is an obvious, present factual dispute: FPUC asserts that its rates are cost-based (Petition for Formal Proceeding at 6-7), while the City asserts that they are not (Petition for Formal Proceeding at 6). The City has raised other issues to put FPUC on notice as to what issues it intends to litigate, at least as of the date of filing its Petition for Formal Proceeding, not solely to establish its standing or right to a hearing. Those determinations are separate, and the City has already addressed both its standing and its claim for relief that the Commission has the jurisdiction and authority to grant.

21. FPUC's suggestion, in paragraph 25 of its Motion to Dismiss and footnote 6 accompanying that text, that it might not know what to defend against because of allegedly insufficient factual pleadings, is specious. FPUC knows what the issues are, because the City clearly stated its fundamental claims: the City is eligible for fair, just, reasonable rates, but the

rates that are in effect are not fair, just, and reasonable because they are not cost-based.

Additionally, the facts that the City has alleged are more than sufficient to warrant a timely hearing.

22. Regarding FPUC's assertions regarding the City's "light" explanations, the City responds as follows. First, the City believes that it is self-evident that a customer is entitled to a hearing on rates that it desires, for which it is eligible, and which it asserts do not satisfy the statutory requirement that rates must be fair, just, and reasonable. Moreover, the City believes in good faith that, given that the Commission had already granted its standing, and also given that the gravamen of its claim is that currently effective rates for which it is eligible are not fair, just, and reasonable, the City's standing and claimed cause of action have been adequately established. The City also relies, as it expected and expects FPUC to rely, on the Commission's normal, standard pre-hearing procedures – including issue identification conferences, exchanges of issue lists, pre-prehearing conferences at the staff and attorney level, prehearing statements, and the prehearing conference – to fully flesh out the issues to be tried at the hearing. Moreover, the Commission must recognize, as has FPUC, that the burden of proof in this case rests with FPUC to prove that its rates satisfy all applicable statutory requirements.

23. FPUC's assertion at paragraph 32, page 16 of its Motion to Dismiss confuses the issues here. FPUC asserts that "[a]n assessment simply cannot be made, even through the hearing process, as to whether these rates do, in fact, send 'appropriate price signals' unless and until these rates have been available to customers for some reasonable period of time." This assertion confuses two different bases upon which one might argue that the rates were or were not sending appropriate price signals. If FPUC wishes to assert that its TOU and IS rates, even though they do not accurately reflect the costs that FPUC incurs to provide those services on a

time-of-use or interruptible basis, do in fact send "appropriate price signals," e.g., because they may induce some desired customer responses, FPUC is free to make that argument in its testimony and briefs. By the same token, the City can – and will – argue through its testimony and briefs that the rates do not and cannot send accurate price signals to customers because they do not reflect either the cost to serve or the value provided by customers who might shift their usage patterns. The point relative to FPUC's assertion that the City's request for a hearing is premature, however, is simply that there is a present factual dispute as to the propriety of rates that are already in effect. The existence of this factual dispute, as it applies to tariffs that are presently in effect, and under which service may become available in April or May of this year, forms the basis for the requested hearing. The City observes that it would have been reasonable to postpone the City's request for a hearing if the Commission had granted the City's request, articulated at oral argument, to suspend the proposed TOU and IS rates.

24. Moreover, granting either FPUC's request to dismiss the City's Petition for Formal Proceeding or to put the requested hearing off to the Fuel Clause hearings in November, would vitiate the provisions of Order No. 11-0112 (at page 8) that recognize that a person whose substantial interests are affected by the Order is entitled to a formal proceeding.

25. Assuming, arguendo, that the Commission wishes the City to provide more detailed explanations of its factual allegations and their relationships to the statutes cited in its Petition for Formal Proceeding, the City is fully willing and able to amend its Petition and the City respectfully requests leave to do so and commits to do so promptly and cheerfully, if the Commission so desires. (The City believes that the Commission's, Staff's, FPUC's, and the City's time would be better spent fleshing out these matters using the Commission's normal pre-hearing procedures, but the City will, of course, comply with the Commission's wishes.)

26. In summary, FPUC's assertion – that a hearing on the issues raised by the City's Petition for Formal Proceeding is premature – is not well-founded and would allow inappropriate rates to continue in effect, even in the face of a known, present factual dispute that has been timely raised by the City. Accordingly, FPUC's Motion to Dismiss must be denied. FPUC's criticisms of the City's allegations to the effect that the allegations are not sufficiently specific to identify issues are also misplaced. The City's Petition for Formal Proceeding is not a complaint. FPUC has acknowledged that FPUC bears the burden of proving that its proposed rates satisfy the statutory requirements. As an eligible customer, the City is entitled to challenge those rates and to put FPUC to its proof. The City will of course participate fully in all of the Commission's prehearing events and processes as this docket progresses toward a timely hearing.

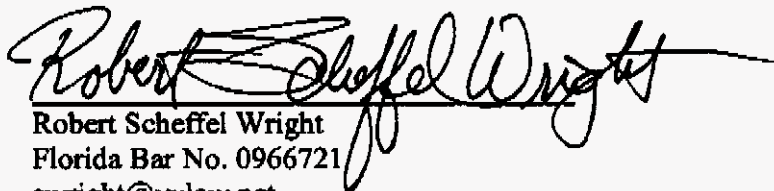
CONCLUSION AND RELIEF REQUESTED

As described above, the City of Marianna has pled facts that, taken as true, are sufficient to establish its standing, namely that it is a customer of FPUC eligible to take service under all but one of the rate schedules that the City opposes in this proceeding, and the City has plainly stated a claim upon which relief can be granted, namely that the rates for which the City is eligible are not fair, just, and reasonable because they are not cost-based, and that the Commission has the jurisdiction, authority, and mandate to deny those rates accordingly. With regard to FPUC's assertion that the City's Petition for Formal Proceeding is somehow premature, the City responds a timely hearing is fully appropriate because there is a present factual dispute as to whether the rates that are now in effect are appropriately cost-based, fair, just, and reasonable. Accordingly, the Commission must deny FPUC's Motion to Dismiss.

WHEREFORE, as explained in the foregoing, the City of Marianna respectfully asks the Commission to deny FPUC's Motion to Dismiss and to continue this docket in accordance with

the Commission's normal procedures. Also as explained above, if the Commission wishes for the City to provide more detailed explanation of how the City's interests are affected by the Commission's actions herein, and of how the statutes cited relate to the facts alleged by the City, the City respectfully asks for leave to amend its Petition for Formal Proceeding to provide such desired explanation.

Respectfully submitted this 24th day of March, 2011.



Robert Scheffel Wright
Florida Bar No. 0966721
swright@yvlaw.net

John T. LaVia, III
Florida Bar No. 0853666
jlavia@yvlaw.net

Young van Assenderp, P.A.
225 South Adams Street, Suite 200
Tallahassee, Florida 32301
(850) 222-7206 Telephone
(850) 561-6834 Facsimile

Frank E. Bondurant, City Attorney
Florida Bar No. 0520330
fbondurant@embarqmail.com
Bondurant and Fuqua, P.A.
4450 Lafayette Street (ZIP 32446)
Post Office Box 1508
Marianna, Florida 32447
(850) 526-2236 Telephone
(850) 526-5947 Facsimile

Attorneys for the City of Marianna, Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery and U.S. Mail this 24th day of March, 2011, to the following:

Jennifer Crawford, Esquire
Pauline Evans, Esquire
Office of the General Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Beth Keating, Esquire
Gunster, Yoakley & Stewart, P.A.
215 S. Monroe St., Suite 618
Tallahassee, FL 32301
bkeating@gunster.com

J.R. Kelly, Esquire
Office of the Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Cecilia Bradley, Esquire
Office of the Attorney General
The Capitol – PL01
Tallahassee, Florida 32399-1050


Attorney