



April 15, 2020

Sevini Guffy, Public Utility Analyst II
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399

Via Electronic Filing

Re: Docket No. 20200091-EU: Proposed amendment of Rule 25-6.064, F.A.C., Contribution-in-Aid-of-Construction for Installation of New or Upgraded Facilities; Rule 25-6.078, F.A.C., Schedule of Charges; Rule 25-6.115, F.A.C., Facility Charges for Conversion of Existing Overhead Investor-owned Distribution Facilities; and Rule 25-6.0343, F.A.C., Municipal Electric Utility and Rural Electric Cooperative Reporting Requirements.

Dear Mr. Guffy:

Florida Municipal Electric Association, Inc. (FMEA) is in receipt of Staff's First Data Request in the above captioned docket, and provides the following responses, with regard to the proposed amendment to Rule 25-6.0343, of the Florida Administrative Code:

1. No.
2. Yes. Regulatory costs incurred to file a report annually can be avoided and incurred, under the proposed amendment of Rule 25-6.0343, only once every three years. It is expected that a three-year filing requirement will not materially increase regulatory costs associated with each report. Thus, the amended rule can be expected to reduce regulatory costs by approximately two-thirds.
3. No.
4. Staff and outside advisors' costs to collect, review, memorialize, and submit data for each report.
5. FMEA has not attempted to estimate the transactional costs for each municipal electric utility which will vary widely for FMEA's members based on utility size, which range from the City of Chattahoochee (about 1,000 customers) to JEA (about 459,000 customers).
6. To the extent the proposed amendment lowers costs for municipal electric utilities, that is a slightly reduced cost burden those municipal electric utilities need to recover from customers, and could have an incrementally positive impact on customers generally.

Sincerely,

Amy Zubaly
Executive Director