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**DANIEL PEREZ**  
*Speaker of the House of Representatives*

April 8, 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**

**REQUEST FOR WORKSHOP**

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. Per the notice, written requests for a rule development workshop must be submitted to you by April 8, 2026.

Please accept this letter as the Office of Public Counsel's ("OPC") written request for a workshop on the above matter. OPC is the statutory representative of the Citizens of the State of Florida, utility ratepayers. As such, Citizens, by and through OPC, have a significant interest in any proposed changes to the current Rule 25-30.117, F.A.C., Accounting For Pension Costs, as there were updates to ASC 715 after March 2017 not contemplated in the rule.

First, Accounting Standards Update (ASU) 2017-07 required companies to disaggregate the service cost component (reported in operating income) from other net benefit cost components (reported non-operating). This became effective for annual periods starting after December 15, 2017 (public), and December 15, 2018 (private).

Second, in August 2018, the FASB issued ASU 2018-14 which amended ASC 715 "to add, remove, or clarify disclosure requirements related to defined benefit pension and other

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postretirement plans.<sup>1</sup> The amendments are part of the FASB's disclosure framework project, which the Board launched in 2014 to improve the effectiveness of disclosures in notes to financial statements.

Under ASU 2018-14, an entity must disclose:

- The weighted-average interest credit rates used in the entity's cash balance pension plans and other similar plans.
- A narrative description of the reasons for significant gains and losses affecting the benefit obligation for the period.
- An explanation of any other significant changes in the benefit obligation or plan assets that are not otherwise apparent in the other disclosures required by ASC 715.

All calendar-year companies were required to adopt the ASU's guidance no later than December 31, 2021.”

OPC requests that a workshop be held prior to any Commissioner consideration of the proposed changes so that input regarding additional language may be heard and considered.

If you have any questions or concerns, please do not hesitate to contact me.

Thank you for your assistance in this matter.

Sincerely,

/s/ Walt Trierweiler

Walt Trierweiler

Public Counsel

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<sup>1</sup> (See, <https://dart.deloitte.com/USDART/home/publications/deloitte/financial-reporting-alerts/2023/reporting-pension-and-postretirement-benefits>)