

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: September 25, 2019
TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk
FROM: Samantha Cibula, Office of the General Counsel *SMC.*
RE: Docket No. 20030575-PU

Please file the attached materials in the docket file listed above.

Thank you.

Attachment

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2019 SEP 25 AM 11:44
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STATE OF FLORIDA

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OFFICE OF THE GENERAL COUNSEL
RICHARD D. MELSON
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

October 16, 2003

Mr. John Rosner
Chief Attorney
Joint Administrative Procedures Committee
Room 120, Holland Building
Tallahassee, FL 32399-1300

RE: Public Service Commission Rule 25-22.032

Dear Mr. Rosner:

I am in receipt of your letter dated October 2, 2003, containing your office's comments to the proposed amendments of Commission Rule 25-22.032. The following is my response to your comments, which I believe memorializes our telephone conversation on October 8, 2003.

Your first question in regard to proposed Rule 25-22.032 pertains to subsection (6)(b). Specifically, you inquire as to the criteria under which Commission staff will request that a company not make direct contact with a customer. I will recommend to the Commission that the phrase "Unless the Commission staff requests that the company not contact the customer directly. . . ." be deleted from the proposed rule language, as including any criteria may cause the rule to become unduly complicated.

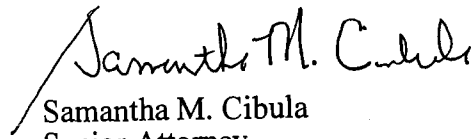
Your second question pertains to the requirement to explicitly incorporate Form PSC/CAF Form 10 into the proposed rule. I will recommend to the Commission that subsection (8)(a) of the proposed rule be revised to address your comment and to comply with section 120.55(1)(a), Florida Statutes.

You also comment on the use of the term "may" in subsection (8)(c) of the proposed rule and on the very last line of Form PSC/CAF 10. I will recommend to the Commission that the language in subsection (8)(c) be revised from "Staff handling the informal conference may permit any participant to file additional information, documentation, or arguments. . . ." to "Any participant may file additional information, documentation or arguments. . . ." As for your comment that the language "Failure to provide this information may result in denial of the informal conference request" on Form PSC/CAF 10 gives the Commission too much discretion, I will recommend to the Commission that this statement be deleted from the form.

Your final comment pertains to subsection (11)(a) of the proposed rule. You ask what the criteria are upon which a request for extension will be granted and for which the time period for such an extension will be set. I will recommend to the Commission that this portion of the rule be deleted.

I hope this response satisfactorily addresses your concerns. If you have any questions, please contact me at (850)413-6202.

Sincerely,


Samantha M. Cibula
Senior Attorney