



Stephanie A. Cuello
SENIOR COUNSEL

March 17, 2022

VIA ELECTRONIC FILING

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Amended Motion to Dismiss and Response in Opposition to the Complaint of Albert Arcuri*; Docket No. 20220038-EI

Dear Mr. Teitzman:

Please find attached for electronic filing, Duke Energy Florida, LLC's Amended Motion to Dismiss and Response in Opposition to the Complaint of Albert Arcuri. The aforementioned document is being amended to include the pleading caption that was erroneously omitted in the original filing and to properly label the attached exhibits. The remaining contents of the Motion have not been altered. Please replace document number 01843-2022, filed on March 14, 2022, with the attached.

Thank you for your assistance in this matter and if you have any questions, please feel free to contact me at (850) 521-1425.

Sincerely,

s/ Stephanie A. Cuello

Stephanie A. Cuello

SAC/mw
Attachments

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint by Albert Arcuri
against Duke Energy Florida, LLC

Docket No. 20220038-EI

Filed: March 17, 2022

**DUKE ENERGY FLORIDA, LLC'S AMENDED MOTION TO DISMISS AND
RESPONSE IN OPPOSITION TO THE COMPLAINT OF ALBERT ARCURI**

Duke Energy Florida, LLC (“DEF” or the “Company”) hereby files this Amended Motion to Dismiss and Response to the Complaint of Albert Arcuri (“Petitioner” or “Mr. Arcuri”) filed against DEF for alleged violation of Rule 25-22.032, F.A.C., with the Florida Public Service Commission (“FPSC” or “Commission”). For the reasons set forth below, DEF requests the FPSC dismiss this Complaint or, in the alternative, deny the Petitioner’s requested relief.

I. Background

1. On or about August 26, 2021, the Petitioner filed a complaint with the FPSC, stating DEF provided him with a quote of \$2,139.51 for his request to convert his wires underground. He believed that amount was too high and requested a detail breakdown of the quote. His complaint was assigned number 1377736E. (see Exhibit A, FPSC Response Form)

2. On or about August 31, 2021, a Consumer Affairs Specialist with the Commission reached out to the Petitioner and explained the tariff on file with the FPSC for the underground service lateral replacing existing overhead service was \$1,762.00. The additional \$377.59 in the quoted cost was for DEF to perform the trenching. Mr. Arcuri expressed dissatisfaction that DEF was permitted to charge more for the existing service conversion than for a new underground service. The Consumer Affairs Specialist explained there was more work involved for a service conversion. Mr. Arcuri stated DEF only had to move a service line and expressed dissatisfaction that he is unable to hire someone on his own to do the work. It was explained that an alternative option

would be for his electrician to dig the trench and install the conduit; however, he cannot install DEF's line/equipment. (Exhibit A)

3. After further review of the cost breakdown and the costs associated with the underground service tariff, Mr. Arcuri remained dissatisfied with the amount to convert his underground service. (Exhibit A)

4. On January 10, 2022, the FPSC sent Mr. Arcuri a letter explaining that since he did not accept their actions to informally resolve the complaint, it was elevated to the Process Review Team (PRT) for further evaluation. Based on the PRT's review, it was determined that DEF did not violate any applicable statutes, rules, company tariffs, or Commission orders. As such, the Commission concluded the informal complaint process. (see Exhibit B, Notice of Complaint, specifically Letter re FPSC Complaint No. 1377736E)

5. On February 18, 2022, the Petitioner filed a formal complaint ("Complaint") with the FPSC, alleging DEF "tripled the cost of underground conversion compared to new installation". Mr. Arcuri stated this action violates Rule 25-22.032, F.A.C., Customer Complaints. He requested a refund of his money and a readjustment of the cost, along with "making funds available to fight Dukes illegal activities, and this Board who they control". (see Exhibit B)

II. Argument for Dismissal

6. A motion to dismiss challenges the legal sufficiency of the facts alleged in a petition to state a cause of action. *Meyers v. City of Jacksonville*, 754 So. 2d 198, 202 (Fla. 1st DCA 2000). The standard to be applied in disposing of a motion to dismiss is whether, with all the allegations in the petition assumed to be true, the petition states a cause of action upon which relief can be granted. *Id.* The moving party must specify the grounds for the motion to dismiss, and all material allegations must be construed against the moving party in determining if the petitioner has stated

the necessary allegations. *Matthews v. Matthews*, 122 So. 2d 571 (Fla. 2d DCA 1960). When making this determination, only the petition and documents incorporated therein can be reviewed, and all reasonable inferences drawn from the petition must be made in favor of the petitioner. *Varnes v. Dawkins*, 624 So. 2d 349, 350 (Fla. 1st DCA 1993); *Flye v. Jeffords*, 106 So. 2d 229 (Fla. 1st DA 1958), overruled on other grounds, 153 So. 2d 759, 765 (Fla. 1st DCA 1963); and Rule 1.130, Florida Rules of Civil Procedure. When “determining the sufficiency of the complaint, the trial court may not look beyond the four corners of the complaint, consider any affirmative defenses raised by the defendant, nor consider any evidence likely to be produced by either side.” *Varnes v. Dawkins* at 350.

7. Rule 25-22.036(3)(b), F.A.C. states:

“.....Each complaint, in addition to the requirements of paragraph (a) above shall also contain: (1) The rule, order, or statute that has been violated; (2) The actions that constitute the violation; (3) The name and address of the person against whom the complaint is lodged; and (4) The specific relief requested, including any penalty sought.”

8. The Complaint alleges DEF violated Rule 25-22.032, F.A.C., Customer Complaints. However, the Petitioner fails to describe in his Complaint what actions taken on behalf of DEF constitute a violation of this Rule. Rather, he remains dissatisfied with the cost of converting his overhead service to underground. (see Exhibit B)

9. The Petitioner has not met the requirement of Rule 25-22.036(3)(b)(2) F.A.C., nor has he provided any evidence that DEF violated any additional applicable statutes, rules, company tariffs, or Commission. When considering all facts plead in the Petition as true, there is no legal basis upon which to grant the relief.

10. Mr. Arcuri has failed to state a cause of action upon which relief can be granted, therefore his Complaint should be dismissed.

III. General Response

11. DEF's tariff, on file and approved by the FPSC, lays out the calculations for any contribution made by a customer for underground conversion. Specifically, section 11.05 Underground Service Lateral Replacing Existing Residential Overhead Services states that the applicant shall contribute \$1,762.00 per service (excluding trenching costs). (See DEF Tariff Section 11.05, sheet 4.115)

12. As explained to the Petitioner, the cost required to convert overhead service to underground is determined based on the cost to remove existing overhead service, the average cost to install underground service, the remaining undepreciated value of the overhead facilities, and the salvage value of the overhead facilities. Additionally, the Petitioner requested DEF dig the trench and is responsible for those expenses under Section 11.05 of DEF's tariff. (Exhibit A)

13. The Petitioner claims that the amount he was required to pay for the underground conversion was in violation of Rule 25-22.032, F.A.C., Customer Complaints. This Rule establishes informal customer complaint procedures that address disputes occurring between regulated companies and individual customers, and provides a process for informal Commission staff resolution of complaints that cannot be resolved by the company and the customer. Mr. Arcuri fails to explain how DEF's calculations for underground conversion violate this Rule. As such, the Rule cited in his Complaint is not applicable to this set of facts.

14. The amount for the underground conversion of overhead lines is consistent with the description and explanation in the Commission-approved tariff and not in violation of any applicable statutes, rules, company tariffs, or Commission orders. The Petitioner has not included

any additional facts that call into question DEF's calculations. DEF calculated the CIAC consistent with its tariff.

IV. Conclusion

Based on the foregoing, Duke Energy Florida, LLC respectfully requests this Commission dismiss the Petitioner's Complaint, or in the alternative deny the relief sought by Albert Arcuri.

Respectfully submitted,

s/Stephanie A. Cuello

DIANNE M. TRIPLETT
Deputy General Counsel
299 1st Avenue North
St. Petersburg, Florida 33701
T: (727) 820-4692
F: (727) 820-5041
E: dianne.triplett@duke-energy.com

MATTHEW R. BERNIER
Associate General Counsel
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
T: (850) 521-1428
F: (727) 820-5041
E: matthew.bernier@duke-energy.com

STEPHANIE A. CUELLO
Senior Counsel
106 East College Avenue
Suite 800
Tallahassee, Florida 32301
T: (850) 521-1425
F: (727) 820-5041
E: stephanie.cuello@duke-energy.com
FLRegulatoryLegal@duke-energy.com

Attorneys for Duke Energy Florida, LLC

CERTIFICATE OF SERVICE

Docket No. 20220038-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 17th day of March, 2022.

s/ Stephanie A. Cuello

Stephanie A. Cuello

Bianca Lherisson
Office of General Counsel
FL Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
blheriss@psc.state.fl.us

Albert Arcuri
3202 Colby Street
Inverness, FL 34453
albertnick@hotmail.com

Exhibit A



FPSC RESPONSE FORM

FPSC Inquiry Number: 1377736E

Complainant's Name: Albert Arcuri

Customer of Record's Name: Albert Arcuri

Service Address: 2302 Colby St., Inverness, FL 34453

Telephone Number(s): (352)-228-3131

Account Number: 82957-31527

Date Received from the FPSC: August 31, 2021

Restate Customer's Concern: (*Verbatim from FPSC*)

The customer states that he was provided with an amount for his request to underground wires (conversion). The amount is \$2,139.51. The customer thinks that it is exorbitant. The customer is requesting a detailed breakdown of this quoted amount. The customer would like to have this resolved.

Actions Taken to Satisfy Customer:

On March 22, 2021, Mr. Albert Arcuri contacted Duke Energy Florida (DEF) to request information on converting his existing overhead (OH) service to underground (UG). Later that day, DEF's Engineer Design Associate (EDA) provided Mr. Arcuri with several cost options, with the minimum cost option of \$1,522.00.

On March 31, 2021, Mr. Danny Lewis, Engineer Technologist, spoke with Mr. Arcuri who stated he was requesting an estimated cost for service conversion, only, at the present time. An estimated cost of \$2,300.00 was provided which included digging the trench, installing the cable and conduit, and removing the OH service. Mr. Lewis explained to Mr. Arcuri since costs are estimated, they are subject change. Mr. Lewis provided two alternative options to Mr. Arcuri and explained if he provides the trench the cost would be \$1,762.00. Additionally, if he provided the trench and conduit to DEF's specs the cost would be \$1,522.00. Mr. Arcuri asked if he could provide and install the cable, to which Mr. Lewis explained DEF must install and maintain the service to the residential home. Mr. Arcuri thanked Mr. Lewis for the estimate and stated he would get back with him when he was ready to move forward with the project.

On August 11, 2021, Mr. Arcuri contacted the EDA to request an update on the project. That same day, Mr. Lewis contacted Mr. Arcuri who requested an exact cost for the service conversion. Mr. Lewis explained the options, as previously discussed in March. Mr. Arcuri requested DEF perform all the work. Mr. Lewis advised Mr. Arcuri that a design would need to be created to provide an exact cost to complete the work.

On August 12, 2021, Mr. Lewis provided Mr. Arcuri with a cost of \$2,139.59 to complete the work which included the trenching, installing cable and conduit, and removing the OH service. Mr. Lewis explained once the invoice was generated, he would send it to Mr. Arcuri.

On August 16, 2021, an invoice in the amount of \$2,139.59, was sent to Mr. Arcuri.

On August 18, 2021, Mr. Arcuri contacted Mr. Lewis and requested a breakdown of the costs. Mr. Lewis scheduled a site visit for the following day.

On August 19, 2021, Mr. Lewis met with Mr. Arcuri onsite and discussed the breakdown of costs. Mr. Arcuri expressed his understanding and stated he was not in a rush to get the job done. Mr. Lewis inquired who Mr. Arcuri's electrician was so he could speak with them about scheduling. Mr. Arcuri stated that his brother, Rocco, was the electrician and that he would contact Mr. Lewis. Mr. Arcuri asked for a timeframe. Mr. Lewis advised he needed to give his crews 4-6 weeks for construction and the scheduling would occur after payment of the invoice was received.

On August 24, 2021, Mr. Lewis provided Mr. Arcuri with assistance on how to pay the invoice. Mr. Arcuri thanked Mr. Lewis for his assistance and stated he would complete the payment processing on his own.

On August 26, 2021, Mr. Arcuri contacted Mr. Lewis to request an update on his project. Mr. Lewis explained the payment had not yet been received; therefore, the job had not been scheduled. Mr. Arcuri inquired if Mr. Lewis had spoken with Rocco. Mr. Lewis shared he had not heard from him; however, he would call him if Mr. Arcuri would provide him with Rocco's telephone number. Mr. Arcuri stated he would have Rocco contact Mr. Lewis. Later that day, Rocco contacted Mr. Lewis and asked about the cost. Mr. Lewis explained the cost for DEF to do the work with and without the trenching and conduit to specs. Rocco advised Mr. Lewis that the invoice was paid. Later that day, DEF received Mr. Arcuri's Courtesy Complaint filed with the FPSC. Ms. Stacey Roberts, Consumer Affairs Specialist, contacted Mr. Arcuri to acknowledge receipt of his complaint and to address his invoice concerns. Mr. Arcuri inquired why he is being charged over \$2,100.00 for the job and why the invoice didn't show a breakdown of charges. Mr. Arcuri expressed concern that his inquiry would cause a service delay. Ms. Roberts assured Mr. Arcuri that his request for information would not delay the project. Ms. Roberts advised Mr. Arcuri she would investigate his concerns and contact him with an update. Ms. Roberts engaged the assistance of Mr. Lewis with Mr. Arcuri's concerns.

On August 27, 2021, Mr. Lewis provided the timeline of events above, and explained the payment had not yet been received. Later that day, a payment of \$2,139.59 was received.

On August 30, 2021, Mr. Lewis advised Ms. Roberts the payment was received, and the job will go to scheduling. Mr. Lewis also stated he will coordinate with Rocco.

On August 31, 2021, Ms. Roberts attempted to contact Mr. Arcuri to explain the approved tariff cost and the cost for DEF to dig the trench. A voice mail was left requesting a return call. Mr. Arcuri returned Ms. Roberts' call with his electrician present. Ms. Roberts explained the tariff on file with the FPSC for UG service lateral replacing existing OH service was \$1,762.00. The additional \$377.59 is for DEF to perform the trenching. Mr. Arcuri expressed dissatisfaction that DEF is permitted to charge more for the existing service conversion than for a new UG service at a cost of \$641.00. Ms. Roberts explained there is more work involved for a service conversion. Mr. Arcuri and his electrician stated DEF only had to move a service line and expressed dissatisfaction that he is unable to hire someone on his own to do the work. Ms. Roberts explained an alternative option would be for his electrician to dig the trench and install the conduit; however, he cannot install DEF's line/equipment. Shortly thereafter, DEF received Mr. Arcuri's complaint filed with the FPSC. Ms. Roberts contacted Mr. Arcuri to acknowledge receipt of his complaint and advised she would contact him with a breakdown of the charges. Mr. Arcuri thanked Ms. Roberts for the call.

On September 8, 2021, Ms. Roberts contacted Mr. Arcuri to advise she obtained a breakdown of the OH to UG conversion tariff. Ms. Roberts offered to review the breakdown and send a copy to Mr. Arcuri, which he accepted. Mr. Arcuri expressed dissatisfaction regarding the charges for new UG vs conversion charges for existing OH to UG and that he cannot install it himself. Ms. Roberts advised Mr. Arcuri she would request further information regarding the new UG service tariff and would contact him with an update.

On September 9, 2021, Ms. Roberts was provided with a page from the FPSC filing that breaks down the new UG service tariff for \$641.00. Mr. Robert McCabe, Filing Initiative Manager, confirmed that the new service tariff is for up to 80' with \$0 per additional feet up to 300'. Conversions are the total length of the service to be converted from the existing DEF pole currently feeding the house to the point of service on

the house (where the meter is located). The fixed tariff rate is an average of multiple conversion scenarios. For a new underground service, the customer receives full value credit for the overhead service that DEF did not have to run towards the cost of the underground service; a differential cost. Therefore, for a new service a customer pays the cost of the underground service, less the cost of the overhead service that did not need installing.

An customer who has an existing OH and requests to convert to UG, is an expense DEF recoups as part of retirement of assets. Therefore, the existing customer has full cost of the UG plus the remaining book value of existing OH service, plus the cost to remove it less salvage value. Mr. McCabe advised Ms. Roberts that all the UG work is contracted out, only portions of the OH work is performed by DEF crews.

On September 10, 2021, Mr. Lewis stated Bentley Open Utility Design (BOUD) software was used to calculate the trenching cost for 90-feet of trenching totaling \$377.59.

On September 13, 2021, Ms. Roberts attempted to contact Mr. Arcuri to discuss the breakdown for the UG service tariffs. A voice mail was left requesting a return call.

On September 14, 2021, Ms. Roberts contacted Mr. Arcuri to review the breakdown of the costs. Mr. Arcuri requested to have them emailed to him so he could view them as they were discussed. Shortly thereafter, Ms. Roberts sent the breakdowns to Mr. Arcuri and they discussed them in detail. Ms. Roberts advised Mr. Arcuri that all UG work is contracted out and some portions of OH work is performed by DEF crews. Mr. Arcuri thanked Ms. Roberts for the information but remains dissatisfied.

Date Submitted: September 22, 2021

Attachments: Underground Service Laterals from Existing Secondary, Underground Service Laterals Replacing OH Service Laterals, Invoice

Exhibit B

COMMISSIONERS:
ANDREW GILES FAY, CHAIRMAN
ART GRAHAM
GARY F. CLARK
MIKE LA ROSA
GABRIELLA PASSIDOMO

STATE OF FLORIDA



OFFICE OF COMMISSION CLERK
ADAM J. TEITZMAN
COMMISSION CLERK
(850) 413-6770

Public Service Commission

NOTICE OF COMPLAINT

TO

Duke Energy Florida, LLC
106 E. College Avenue, Suite 800
Tallahassee, FL 32301
(via Certified Mail No. 7017 1000 0000 4194 3898)

Re: Docket No. 20220038-EI- - Complaint by Albert Arcuri against Duke Energy Florida, LLC.

Notice is hereby given, via certified U.S. mail, that the above-referenced complaint was filed with the Public Service Commission on February 18, 2022, a copy of which is attached.

You may file a response to this complaint with the Office of Commission Clerk at the address below, with a copy sent to the complainant. The Commission also accepts documents for filing by electronic transmission provided the electronic filing requirements are met. For information regarding these requirements, visit the Commission's website at www.floridapsc.com.

Noticed this 21st day of February, 2022.

Sincerely,

A handwritten signature in blue ink, appearing to read "AJT", enclosed in a blue oval.

Adam J. Teitzman
Commission Clerk

AJT/lms

Enclosure

cc: Albert Arcuri
Office of Public Counsel
Office of General Counsel
Office of Consumer Assistance & Outreach
Docket File

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: February 18, 2022
TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk
FROM: Bianca Lherisson, Senior Attorney, Office of the General Counsel *BYL*
RE: Docket No. 20220038-EI - Complaint by Albert Arcuri against Duke Energy Florida, LLC.

Please see the following Revised Request to Establish Docket for filing to include additional information not previously provided on the original Request.

Thank you.

BYL

REQUEST TO ESTABLISH DOCKET

(Please type or print. File original with CLK.)

Date:	2/18/2022	
1. From Division / Staff:	Gcl / Bianca Lherisson	
2. OPR:	GCL	
3. OCR:	CAO, ECO	
4. Suggested Docket Title:	In re: <u>Complaint by Albert Arcuri against Duke Energy Florida, LLC.</u>	
5. Program/Module/Submodule Assignment:	A9	
6. Suggested Docket Mailing List		
a. Provide NAMES/ACRONYMS, if registered company		<input type="checkbox"/> Provided as an Attachment
Company Code, if applicable:	Parties (include address, if different from MCD):	Representatives (name and address):
EI801	Duke Energy Florida, LLC Stephanie Cuello, 106 E College Ave Suite 800, Tallahassee, FL 32301 stephanie.cuello@duke-energy.com	
N/A	Mr. Albert Arcuri 3202 Colby Street Inverness, FL. 34453 albertnick@hotmail.com	
b. Provide COMPLETE NAME AND ADDRESS for all others (match representatives to companies)		
Company Code, if applicable:	Interested persons, if any, (include address, if different from MCD):	Representatives (name and address):
7. Check one:	<input checked="" type="checkbox"/> Supporting documentation attached	<input type="checkbox"/> To be provided with Recommendation
Comments:		

COMMISSIONERS:
GARY F. CLARK, CHAIRMAN
ART GRAHAM
GARY F. CLARK
MIKE LA ROSA
GABRIELLA PASSIDOMO

STATE OF FLORIDA



OFFICE OF THE GENERAL COUNSEL
KEITH C. HETRICK
GENERAL COUNSEL
(850)413-6199

Public Service Commission

January 10, 2022

Certified and Regular Mail

Mr. Albert Arcuri
3202 Colby Street
Inverness, FL 34453-3840

Re: Florida Public Service Commission Complaint Number 1377736E

Dear Mr. Arcuri:

This letter is in response to your complaint filed with the Florida Public Service Commission (PSC or Commission).

According to the complaint, you stated that you were told by DEF that it would cost \$2,139.51 to convert your existing overhead facilities to underground facilities. You requested a detailed breakdown of the quoted amount. You stated that the conversion is just your overhead lateral being changed to an underground lateral. On September 17, 2021, you told PSC staff that you believed that DEF charged \$600.00 to install underground facilities for new service; therefore DEF was overcharging you to convert the facilities. PSC staff explained that the charge was determined based on the cost to remove the existing overhead service, the average cost to install underground service, the remaining undepreciated value of the overhead facilities, and the salvage value of the overhead facilities. You are seeking a credit adjustment of \$2,139.51 from DEF.

Because you did not accept the Commission's actions to informally resolve your complaint, it was reviewed by the PSC's Process Review Team (PRT) in accordance with Commission Rule 25-22.032, Florida Administrative Code (F.A.C.). Based on the PRT's review, it does not appear that DEF violated applicable statutes, rules, company tariffs, or Commission orders. Your complaint has been thoroughly reviewed, and the informal complaint process is concluded.

If you disagree with your complaint's conclusion, you may file a petition for initiation of formal proceedings for relief against DEF. The request for formal proceedings must follow the complaint requirements in Rule 25-22.036, F.A.C. - Initiation of Formal Proceedings (enclosed for your review). The Rule can be found online at www.flrules.org.

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PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us

You may file your petition by mail (address below) or electronically via the Commission's web portal. Access the Electronic Filing Requirements and e-filing instructions at <http://www.floridapsc.com/ClerkOffice/EFilingRequirements>, and the Electronic Filing Web Portal at <https://secure.floridapsc.com/ClerkOffice/EfilingPublic>. The PSC cannot accept this request via fax.

Mailing address:
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

DEF can respond to your formal complaint. After considering your complaint and DEF's response, the Commission will rule on your petition. In its consideration, the Commission will consider whether your complaint meets the rule requirements and whether the Commission is able to grant your requested relief.

If your formal complaint application does not meet the requirements specified in Rule 25-22.036, F.A.C., or if the Commission is unable to grant the relief you are seeking, your formal petition may be dismissed. If you have questions about a formal petition or formal proceedings, I can be reached at (850) 413-6630 or blheriss@psc.state.fl.us.

Sincerely,

/s/ Bianca Lherisson

Bianca Lherisson
Senior Attorney

cc: DEF

West's Florida Administrative Code
Title 25. Public Service Commission
Chapter 25-22. Rules Governing Practice and Procedure

Rule 25-22.036, F.A.C.
Fla. Admin. Code r. 25-22.036

25-22.036. Initiation of Formal Proceedings.

Currentness

(1) Application. An application is appropriate when a person seeks authority from the Commission to engage in an activity subject to Commission jurisdiction.

(2) Complaints. A complaint is appropriate when a person complains of an act or omission by a person subject to Commission jurisdiction which affects the complainant's substantial interests and which is in violation of a statute enforced by the Commission, or of any Commission rule or order.

(3) Form and Content.

(a) Application. An application shall be governed by the statute or rules applicable to applications for authority. In the absence of a specific form and content, the application shall conform to this rule.

(b) Complaint. Each complaint, in addition to the requirements of paragraph (3)(a), above, shall also contain:

1. The rule, order, or statute that has been violated,

25-22.032

2. The actions that constitute the violation,

THEY TRIPLED THE COST OF UNDER GROUND CONVERSION COMPARED TO NEW INSTALLATION!

3. The name and address of the person against whom the complaint is lodged,

DUKE ENERGY

4. The specific relief requested, including any penalty sought.

REFUND MY MONEY FROM THIS ILLEGAL ACTION!

Credits

AND READJUST THIS COST!

Adopted Dec. 21, 1981; Transferred from 25-22.36; Amended May 3, 1999, July 17, 2000.

AUTHORITY: 350.01(7), 350.127(2) FS. Law Implemented 120.569, 120.57, 350.123, 364.035, 364.05, 364.057, 364.058, 364.335, 364.337, 366.04, 366.06, 366.071, 366.076(1), 366.8255, 367.031, 367.045, 367.071, 367.081, 367.0814, 367.0817, 367.082, 367.0822, 367.091, 367.101, 367.171 FS.

ALSO MAKE FUNDS AVAILABLE TO FIGHT DUKES ILLEGAL ACTIVITIES, AND THIS BOARD WHO

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THEY CONTROL !! *AL* *ARCURI*

1-17-2022

Current with amendments available through December 6, 2021. Some sections may be more current, see credits for details.

Rule 25-22.036, F.A.C., 25 FL ADC 25-22.036

End of Document

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TO Whome it MAY CONCERN!

'THIS BOARD SHOULD PROTECT ME,' THE PUBLIC!
AND YOU DO NOT! YOU PROTECT THE POWERFUL.

DUKE ENERGY! THIS WAS A SIMPLE REQUEST!
THEY CHARGED 4 TIMES THE AMOUNT TO
PLACE MY POWERLINE UNDERGROUND COMPARED
TO NEW INSTALLATION. WHICH THE ONLY DIFFERENCE
IS THEY HAVE TO CUT THE OLD POWER LINE DOWN!

THATS IT & PLEASE! MAKE FUNDS AVAILABLE
TO PEOPLE WHO CAN'T AFFORD
TO FIGHT DUKE ENERGY
AND/OR THE P.S.C.