LEGISLATIVE # 130155A

Nathan A. Skop, Esq. 420 NW 50th Blvd. Gainesville, FL 32607 Phone: (561) 222-7455

E-mail: n skop@hotmail.com

July 16, 2013

VIA ELECTRONIC FILING

Ms.Ann Cole Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

In re: Petition for Expedited Review of Electric Rate Structure for Gainesville Regional Utilities

Dear Ms. Cole:

Enclosed for filing, please find the Petition for Expedited Review of Electric Rate Structure for Gainesville Regional Utilities.

If you should have any questions, please feel free to contact me at (561) 222-7455.

Sincerely,

s/ Nathan A. Skop

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:	Petition for	Expe	dited Review	of Electric	DOCKET NO.
Rate	Structure	for	Gainesville	Regional	
Utiliti	es				FILED: July 16, 2013

PETITION FOR EXPEDITED REVIEW OF ELECTRIC RATE STRUCTURE FOR GAINESVILLE REGIONAL UTILITIES

Petitioners Eye Associates of Gainesville, LLC¹ and Deborah L. Martinez ("Petitioners"), by and though undersigned counsel, and pursuant to Sections 120.569, 120.57(1), 366.02(2), and 366.04(2)(b), Florida Statutes and Rules 25-22.036, 28-106.201, and 25-9.051(7), Florida Administrative Code, hereby petition the Florida Public Service Commission ("Commission") for expedited review of the electric rate structure for Gainesville Regional Utilities. In support thereof, the Petitioners state as follows:

INTRODUCTION

- 1. Gainesville Regional Utilities ("GRU") d/b/a City of Gainesville is a municipal utility serving over 90,000 customers in Alachua County, Florida. GRU's headquarters are located in Gainesville, Florida.
- 2. Petitioners are Commercial and Residential customers receiving electric service from Gainesville Regional Utilities ("GRU"). Petitioners seek expedited review of the existing and proposed GRU electric rate structure to ensure that the electric rate structure is fair, just, and reasonable, non-discriminatory, allocates the recovery of costs appropriately between the customer classes, and allocates the recovery of costs equitably between members of a customer class. Petitioners request for expedited review is based upon the results of the cost of service

The customer of record for this commercial account is William A. Newsom, M.D.

study initiated by GRU, and the electric rate structure changes that GRU has recently proposed to

implement effective October 1, 2013. This petition may be subsequently amended to add

additional petitioners.

3. The Commission has jurisdiction over the electric rate structure of a municipal

utility pursuant to Sections 366.02(2) and 366.04(2)(b), Florida Statutes.

4. Any pleading, motion, notice, order or other document required to be served upon

the Petitioners or filed by any party to this proceeding should be served upon the following

individual:

Nathan A. Skop, Esq.

420 NW 50th Blvd.

Gainesville, FL 32607 Phone: (561) 222-7455

E-mail: n skop@hotmail.com

5. A conformed copy of this Petition has been provided to GRU and the Office of

Public Counsel ("OPC") contemporaneously with the filing of this Petition.

BACKGROUND

6. GRU electric rates are among the highest in the State of Florida. As an

illustrative example, a GRU non-demand business customer using 1,500 kWh per month paid

approximately \$71.23 more per month than a similar FPL customer in December 2012. In 2014,

GRU is expected to have the highest electric rates in the State of Florida across all rate classes.

High electric rates are a competitive and economic disadvantage for business and residential

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customers served by GRU in Alachua County. Rate structure inequities between, or within, customer rate classes further aggravates the problem of high electric rates.²

- 7. GRU has significantly overcharged its customers for fuel over the past three years in violation of its own unwritten internal policies and City Ordinance in order to hide the true rate impact of the GREC contract.³ The projected balance of these overcharges is expected to reach \$26.2 million on September 30, 2013. In sharp contrast, every electric utility in the State of Florida, except GRU, has passed millions of dollars of fuel savings onto their customers during this same period of time.
- 8. On or about October 20, 2011, the Gainesville City Commission authorized GRU to execute a contract with Baker Tilly Virchow Krause, LLP ("Baker Tilly") to provide cost of service and utility rates studies. Prior to hiring Baker Tilly, GRU had performed cost of service and utility rates studies internally for a number of years.
- 9. On or about April 3, 2012, Baker Tilly provided GRU with a preliminary draft report of the electric revenue requirements and forecasted electric cost of service analysis for the projected 2013 test year. Page 35 of this report compared the electric cost of service to the forecasted revenues at current rates by customer class. A true and correct copy of Page 35 is attached herein as Exhibit A. Exhibit A indicated that:

² Corresponding electric rates for the City of Alachua are substantially lower than those paid by GRU customers notwithstanding the fact that the City of Alachua purchases their power from GRU under a wholesale contract.

³ In April 2009, GRU entered into a \$3.1 billion, thirty (30) year contract to purchase 100 MW of biomass power at a cost of approximately \$130 MWh. GRU has recently admitted that the monthly residential rate impact from the GREC contract is approximately \$30 per 1,000 kWh on a standalone basis. To date, GRU has been unable to sell any of this excess power at the same contractual price that GRU customers are obligated to pay. The cost of purchased power will be recovered through the fuel adjustment charge. The annual cash payment obligations under the GREC contract are approximately \$102.5 million per year beginning in 2014.

- The cost of service for the electric wholesale customer class was approximately 45.48% to 48.97% higher than forecasted revenue at current rates.
- The cost of service for the electric general non-demand customer class was approximately 14.88% lower than forecasted revenue at current rates.
- The cost of service for the electric general demand and electric large power customer class was approximately 5.36% and 6.59% lower; respectively than forecasted revenue at current rates.
- The cost of service for the electric residential customer class was approximately 3.30% higher than forecasted revenue at current rates.
- 10. On or about November 20, 2012, Baker Tilly provided GRU with a presentation summarizing the revenue requirement, cost of service, and rate design recommendations ("Baker Tilly Presentation"). Slide 33 of the Baker Tilly Presentation compared the electric cost of service to the forecasted revenues at current rates by customer class. A true and correct copy of Slide 33 is attached herein as Exhibit B. Exhibit B indicated that:
 - The cost of service for the electric wholesale customer class was approximately 49.11% higher than forecasted revenue at current rates.
 - The cost of service for the electric general non-demand customer class was approximately 7.88% lower than forecasted revenue at current rates.
 - The cost of service for the electric general demand and electric large power customer class was approximately 4.16% and 4.50% lower; respectively than forecasted revenue at current rates.

- The cost of service for the electric residential customer class was approximately 4.83% higher than forecasted revenue at current rates.
- 11. Slide 36 of the Baker Tilly Presentation also indicated that GRU commercial class customers are subsidizing the Alachua wholesale contract to the benefit of the residential class customers. A true and correct copy of Slide 36 is attached herein as Exhibit C.
- Annual Operating Budget for FY2014 ("GRU Budget"). The GRU Budget proposed a 10.6% to 11.0% monthly electric bill increase for Commercial class customers.⁴ The proposed rate increase results from a substantially higher monthly electric customer charge and electric fuel adjustment charge increase (\$20.00 per 1,000 kWh), offset slightly by a lower energy rate in the base rate portion of the bill. Commission review of the existing and proposed rate structure is required because the Gainesville City Commission, as the Board of Directors of GRU, lacks the technical and utility regulatory expertise to independently determine whether the existing rate structure and proposed Commercial rate structure addresses the cost of service and rate structure inequities identified within the Baker Tilly analysis.
- 13. The GRU Budget also proposed to substantially revise the rate structure for the Residential customer class. Under the GRU modified tier proposal (two tier), GRU proposes to decrease the base rate portion of the 1,000 kWh monthly residential electric bill by approximately 33.0% in FY14 (from \$76.67 in FY13 to \$57.65 in FY14) to offset the corresponding \$20.00 per 1,000 kWh increase in the fuel adjustment charge resulting from the

⁴ In November 2010, GRU extended the term of the wholesale power contract with the City of Alachua for a period of 10 years. Pursuant to Exhibit 2 of the contract, GRU cannot renegotiate the pricing of the contract within the first (5) years. At present, the corresponding electric rates for the City of Alachua customers are substantially lower than those paid by GRU customers. GRU considers the Alachua wholesale contract to be native load.

GREC contract.⁵ The GRU modified tier rate structure is inequitable within the residential rate class to the extent that its shifts the majority of the proposed rate increases to customers using less than 1,000 kWh and large families using more than 1,000 kWh. The inequality of the proposed GRU modified tier rate structure is illustrated by red line of the graph in Exhibit D. Exhibit D graphs the distribution of the GRU monthly residential rate increase (FY14 – FY13) as a function of usage within the rate class. Alternatively, GRU proposes to use the existing three tier rate structure under which it will substantially increase the monthly customer charge while revising the base rate energy charges within each tier. The effect of GRU proposal using the existing tiers is illustrated by blue line of the graph in Exhibit D. Commission review of the existing and proposed residential rate structure is required because the Gainesville City Commission, as the Board of Directors of GRU, lacks the technical and utility regulatory expertise to independently determine whether the existing rate structure and proposed rate structure addresses the cost of service and rate structure inequities identified within the Baker Tilly analysis.

14. GRU has not sought input from affected Commercial and Residential customer class stakeholders prior to proposing changes to the existing rate structure.

DISPUTED ISSUES OF MATERIAL FACT

15. Whether the existing and proposed GRU electric rate structure is fair, just, and reasonable?

⁵ This seemingly contradicts the Baker Tilly conclusion that the revenue requirement for the residential rate class should increase. It appears that GRU is optimizing around a singular point (1,000 kWh) in an attempt to keep its statewide electric rate comparison metric from being the highest in the state by a wide margin. Moreover, if GRU has the ability to suddenly decrease the base rate portion of the 1,000 kWh monthly residential electric bill by 33%, it is difficult to understand why GRU needed to overcharge its customers \$26.2 million for fuel.

- 16. Whether the existing and proposed GRU electric rate structure is non-discriminatory?
- 17. Whether the existing and proposed GRU electric rate structure allocates the recovery of costs appropriately between the customer classes?
- 18. Whether the existing and proposed GRU electric rate structure allocates the recovery of costs equitably between the members of a customer class?

RELIEF SOUGHT

- 19. Petitioners hereby request expedited review of the existing and proposed GRU electric rate structure by the Commission to ensure that the electric rate structure is fair, just, and reasonable, non-discriminatory, allocates the recovery of costs appropriately between the customer classes, and allocates the recovery of costs equitably between members of a customer class. Petitioners request for the relief sought is further supported by the signature petitions of approximately one hundred twelve (112) residential and commercial customers of GRU.
- 20. In furtherance of this review, Petitioners request a formal evidentiary hearing to address the disputed issues of material fact presented above and any other issues within its jurisdiction that the Commission deems appropriate.
- 21. Petitioners request for Commission review is further supported by the initial signature petitions of approximately one hundred twelve (112) GRU residential and commercial customers. Original copies of the signature petitions are attached herein as Exhibit E. Additional signature petitions supporting this Petition will be filed with the Commission as they become available.

WHEREFORE, Petitioners respectfully requests the Commission to open a docket and issue a procedural order establishing a hearing schedule in furtherance of conducting an expedited review of the existing and proposed GRU electric rate structure.

s/ Nathan A. Skop Nathan A. Skop, Esq. Florida Bar No. 36540 420 NW 50th Blvd. Gainesville, FL 32607

Phone: (561) 222-7455

E-mail: n_skop@hotmail.com

Counsel for Petitioners

EXHIBIT A

Gainesville Regional Utilities

Draft Cost of Service Report

Cost of Service Comparison to Current Rates by Customer Class

			Forecasted Revenues	Increase or	Percent Increase
Customer Class	O	Cost of Service	at Current Rates	(Decrease) Required	Required
Residential	ક	110,593,638	\$ 107,057,724	\$ 3,535,914	3.30%
General Non Demand		23,601,646	27,726,450	(4,124,804)	-14.88%
General Demand		71,502,962	75,551,353	(4,048,391)	-5.36%
Large Power		16,649,310	17,824,647	(1,175,337)	-6.59%
Street Lighting		4,549,858	4,733,980	(184,122)	-3.89%
Alachua Wholesale		13,434,646	9,234,577	4,200,069	45.48%
Seminole Wholesale		9,924,938	6,662,359	3,262,579	48.97%
	Total \$	250,256,997	\$ 248,791,090	\$ 1,465,907	<u>0.59%</u>

EXHIBIT B

Electric Cost of Service



Candor. Insight. Results.

Customer Class	ဒိ	Cost of Service	R 9	Revenues at Present Rates		Difference	Percent Difference
Residential	↔	111,298,200	↔	106,171,746	↔	5,126,454	4.83%
General Non Demand		25,369,669		27,541,042		(2,171,373)	7.88%
General Demand		71,774,938		74,893,057		(3,118,119)	4.16%
Large Power		16,841,814		17,635,921		(794,107)	4.50%
Street Lighting		4,605,061		4,733,980		(128,919)	2.72%
Alachua Wholesale		14,348,725		9,622,912		4,725,813	49.11%
Total	49	244,238,407	69	\$ 240,598,658	69	3,639,749	1.51%

EXHIBIT C



Candor. Insight. Results.

Impact of Alachua on Other Classes

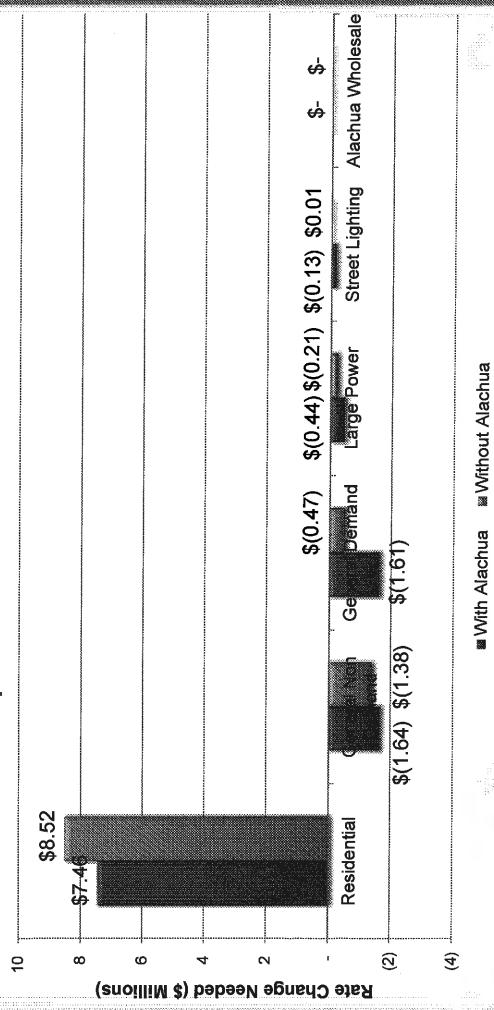


EXHIBIT D

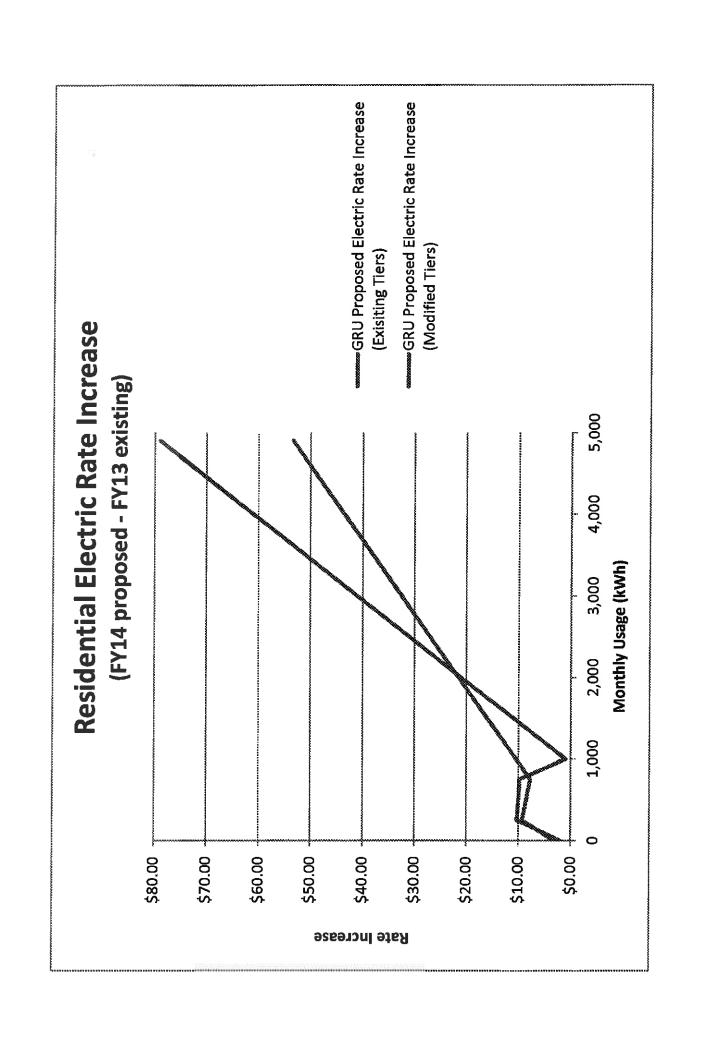


EXHIBIT E

The undersigned customers of Gainesville Regional Utilities ("GRU") hereby request and support expedited eview of GRU's proposed electric rate structure by the Florida Public Service Commission ("FPSC") to address the cost of service inequities shown in the Baker Tilly cost of service study commissioned by GRU. FPSC review is necessaryto ensure that the proposed electric rate structure sought to be implemented by GRU within the FY14 budget is: (a) fair, just, and reasonable; (b) nondiscriminatory, and reflects the recovery of costs consistent with providing service to the affected rate classes. FPSC review is further warranted because the Gainesville City Commission lacks the fechnical and utility expertise to independently evaluate the electric rate structure proposed by GRU.

	Customer Name	Service Address	Account Type (Residential or Business)
1;	Debbie MArtin	2 2217 NW 16th Tergs.	Resident
2.	margaret Rcook	1136 E 88 + 61 Gluille	Regident
3.	MARK R COOK	113 5, E. 384 ST Svile	ResiDeNT
	Dianna Kish	4726 NW 27 TERRICE Brille	Resident
5.	Liz Kish	4736 NW 27 TEAR , 6' Wille	Resident
	JOHN BECK	5526 SXYTEPL, CYLLE	RESIDENT
7,		5536 SW 43 PL GVILLE	RESIDENT
8.	Nancy BECK (MURIZ NEWSOM	ESE ASSOCIATES OF BIVILLE 2521 NW 41 ST BELOVE	Business
	JOH SAIRLES	9323 SW 8TH AUE BOLGT	Resident
	HAWOCK TALMO	4140 NW JTKL 146 GVL 606	bussiness
113	BEN SAVOJA	2424 N W 67 KTR 633 05	Residential
12.	PATTI SINONS	2220 NW 87 TE 600	Residential
ļ	JANTUTTLE	3041 Sw 68th Cn 52608	Residential
	TON PLANES	B514 SN 57 LW GNU 32 609	BELIDENTIN
15,	Harold LWise	47125W67th Ter G. ville 32608	Residentail

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	Customer Name	Service Address	Account Type (Residential or Business)
16.	Active! Mentor	, 2105 MW 16th In Guille	Residental
17.	د د الاستان	5010 NEWALL STIFF 9	Residential
18.	DibyHaneDoor	3284 SE 2000 OUR Gulls	Kladenias
19.	Tail I Tan	1314 S.C. 7" Ave Svile	Residential
20.	Robe Mand	23065E 45 Tr 32641	Kesden
21.	Andrea Suy	3501 NE 15th St. 19th Soillett 3000	Residential
22,	LARNALEND	648 N. E. 16th TERR GVM	153 MEDINE
23.	JOHN FAKUN	SAME AR ADONE GING	11
24.	Tomela back	614 NE 2013 + Gaineseill	Residential
25.	Patricia Spencer	3434 N.W 54th Lane Grille, Pl. 3265	3 Residential
26.	JHRUN	1690 N. E. Othavel	Residential
27.	Kalaata	Jan 100 NE 2K Spect-6	Me, FC Blow
28.	The Brew Spot	1000 NE 16 Ave Guile	Business
29.	Las HELSEY		Residential
30*	John Hamis	1100 NW 45th AVE I AX FIN 32609	Residentich



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	Customer Name	Service Address	Account Type (Residential or Business)
31.	Made Davis	1146 N.E 16 MARE 61V, the 32601	Business
32.	Wind. Navis	1039 SE 11 AN 32601	fesidential
33.	Velinda Davi	1602 SE 120 52641	Residential
34.	W:11:8 W: #	1602 NE 47 place	fresidential
35.	i) He F. Dwee	1903 NE 25" STREET !!	Pridestal
36.	All envery	2405 NE 57 BIGHT 64	Readu 11
37.	Hillary Gen	6815 West Upiversi here	3 Residential
38.	Hicker Stephen	V Zantalijana	Reidential
39.	Caitin Tomo Zat	: 1400 SW 10th Terrace Apts	Residential
40.	Kanei HMS	1246NE17 + 4500	Resautial
41.	Seffress Keaffake	1000 NE 16th Ave H 32601	Business
42,	Don Stansel	1307 NW 6th of Paris	CourthActioness
43,	Emma Have		a Cosefort
44.	Chille S.	1050 NEIZH AVE CILL	Kesidential
45.	Linda Falau	1408 SW 10th +18600 #31 9	le Posidential
<u> </u>		37	last

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···········		Service Address	(Residential or Business)
46.	RobertSinn	ONS THE BUILD	Kesidonce
47.		K 40/50 Millians	Residence
48.	Earnest Par	4 UD3NW 8th State	Residential
49.	sinie Hall	1900Se Ust ADL 104	Residential
50,	In ma a - Mar	14.1 22 00 Walda Kalisalo &	\ e5100 11/0
51.	HNDreAFO	ON NOT PERM	e Hedent
52,	Kelly Diefendorf	3560 NW 35 OF 1 G10, 1/2 208 N. 13. STATAS GATE	Residential
53.	RussWUSKI	BOBNIN STATUS GUIT	13810 CM 5
r i		13711 ME BOADADA BIVILLE	Desidence
55.	Langer Tholsion	110 % gin Glydle 32601	lesidence
	Drw Wood	2701 SW 130 ST GIVING 32601	Residence
57.	Renea Bohama	3643 56 20 4 AC 326	07 Resident
	Linda Kassla	67205W 64 Mes 3260	Resident
3	Same Miller	231 NE 46 st Gainit 3264)	Condent!
1	Jimes Talysell	1004 NE 26 Tes	

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	Customer Name	Service Address	Account Type (Residential or Business)
61.	Vivian Duncan	1600 NE 12 DANE #49 GUIL	Residental
		2110 5W 110 ST GVL FL 3260	housedid
	See Strategies and account of the Children of	GIVING	7
64.	Kobrel A Holling	16671 NUZITER High Springs	2
March Section 1	 Application of the property of th	9620110 13 St. 32653	Postertial
******	Basicas and a secondary control of the miles of the factors of t	1315610 Aug 32601	Business
67.	KAREN ORR	2546 SWI4 HDR 32608	Buckley
68.	MAKIA PARSONS	439 NW. 37TH AVE 30609	Kasidential
69.	Jo IFE R. R. L	2717 NW264 <1. 32605 (Residential
70.	Mac Me Ed	1000 SWIHL - 614116 4705 NW 3674 67 32465	(Residential
1	A (Marias	4705 NU 36TH GT	RESIDENTIAL
72.	$y/l - \lambda_{K}$	809 N. MAINST. OVILL	Burney,
73.*	Quo Ribell	1909 NW 6-751. Drill	Bushey
74,	Tuly Halle	12718 NO 1154 37605	Residential
75.	Red Turning ? La	1 523 NW 3 Am fork, R	Rusiness

The undersigned customers of Gainesville Regional Utilities ("GRU") hereby request and support the expeditedreview of GRU's proposed electric rate structure by the Florida Public Service Commission ("FPSC") to address the cost of service inequities shown in the Baker Tilly cost of service study commissioned by GRU. FPSC review is necessaryto ensure that the proposed electric rate structure sought to be implemented by GRU within the FY14 budget is: (a) fair, just, and reasonable; (b) nondiscriminatory, and reflects the recovery of costs consistent with providing service to the affected rate classes. FPSC review is further warranted because the Gainesville City Commission lacks the technical and utility expertise to independently evaluate the electric rate structure proposed by GRU.

	Customer Name	Service Address	Account Type (Residential or Business)
76,	8TH Ave Fool Stor	1634 NO 8TH AND	Businers, "
77.		MAN NW 54 CM	Home Lesidentil
78.	Arnan Wolch	2234 NW 65th Rd	. Home
79.	Demaras Betsey	205 5W7545fauf AP1410-16	Home Residential
80,	Grandals	allOSSIESHAAR GUILLE	RUSINES
81.	Make	301 \$\frac{1}{2000} \left \(\frac{G_111/6}{2100} \) \\ \\ \\ \ \\ \ \ \ \ \ \ \ \ \ \ \	Residential
82.	Lillie Million	u 1989 S.E. [4± Note 51" \$2.47"	Re Sidential
83,	Nikita Childran	MX24068E 11 SK \$264/	Lesidential
84.	Lucius estano	213211/E. 27 ARC 6526	opp arment
85.	On La Milde	405 NE COTH CAUNIVAGE FI	Residentia
86.	Na Onel	506 S.E B ter Gains 16	Residental
87.	Nekustra Stan	Lutter 1101 SE 15th ST AP 11	Residential
88.	Jan Simmer	1800 NW 4 St., 812 GNV. 32609	Residential
89.		3101 NE 15" St Apt 382 GAUSIG	
		40 Se ter APTA Gulle	

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Customer Nan	The second of th	Account Type (Residential or Business)
91. Robert Mill	1 (5265W 374X WAY GWILL	Residential
92. John Ki	1 4720 NW 275 TEN	Residential
93, ROGER C	x 932 NW 45th TERR	RESIDENTIAL
94. Merrie HO	, , , , 101121 Mul. JNT 1/4(s	Residential
95. BIG Daddy	M 2025 SW 75th & Givillo	BUSINESS
96. RNEG GONZ	10 39 X7 N.W. FXTEAR WIN	RESIDENTIAL
Same and	ell 3531 NW 35 PL Gainesville 35	Residential
98. Soe Lower		Residential.
	on 3706 N.W.21st Gaynesville	Residential
100.	5201 NW 62-NO COURT	Pescheutial
101. Con HM	1 2217 NW 16 Ten 6 3260	Residential
102. POSEMARY/Ka	LIS JUE IVINIA LA SELOS	Residential
103. + 1 mik (1)	184925 SE 45ROCKSWY	Prondential
104. Willia Thom	113NE 22AVG-ville Fla 32609	Home Rasidential
	1 813 HE 17th D, A 32641	resideatial
106 Richard		Risidental
110)	32603	

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3 30			
	Customer Name	Service Address	Account Type (Residential or Business)
106.	GaralyuSus	47005WAreher RN 12-211- 3260x	Bof4/
107.	Admita back	93235W EM Ave Good 32607	િલ્દ
108.	HANOCU TALMA	2623 NW 27th Place 63/205	Revolue
109.	Derek S. Free	4229 NW 43 St # 31 Galastin Fl. 3806	2 Control of the c
110,	Lawiler Bootle	, 101101075 ⁴¹ 51:50k3,Gav	367- (Busingss)
111.	NALISKR	ipo Nu Soth, Grinaville, FT 32007	Risidati
112.			
113,			1850 1850 1850
114.			
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