September 8, 2026

Re: Docket No. 20240019-PU

Dear Florida Public Service Commissioners:

We, the undersigned organizations, urge you to reject the proposed amendment of Rule 25-14.004, F.A.C., Effect of Parent Debt on Federal Corporate Income Tax.

Florida is in an energy affordability crisis. For four decades the current rule has steadfastly reflected the relationship between a subsidiary and its parent company and that the subsidiary is in a highly captive and dependent relationship with its parent. Subsidiaries do not exist in a vacuum. Because of such, it is important to consider the financial support that a subsidiary provides to its parent company and to return to ratepayers some of the benefits that the parent company receives from that subsidiary's ratepayers.

As an example, Tampa Electric is a subsidiary of Emera. Emera has reported to shareholders that although Tampa Electric customers only make up approximately one-third of its customer base, they are responsible for nearly two-thirds of Emera's profits. Tampa Electric customers — bankrolling Emera, a foreign company — deserve the income tax savings being passed on from Emera's debt that is disguised in the form of high cost equity. If Emera is benefitting from tax breaks on its U.S. tax bill provided by Tampa ratepayers, then Tampa ratepayers deserve the bill reductions that the existing rule has been reliably providing for decades.

In 2025, the average monthly bill for Tampa Electric residential customers was the 3rd highest in the nation out of investor-owned utilities. Tampa residents are looking for relief from increasingly unaffordable electric bills, and removing Rule 25-14.004, F.A.C., would further risk bills rising more than residents can afford.

All Floridians should benefit from the tax breaks of foreign parent companies. As NextEra, the parent company of Florida Power & Light, is currently merging with Dominion Energy, to create the largest utility in the country, the impacts of this rule could be even more crucial. Florida Power & Light services over 12 million Floridians who could see bills impacted.

The Florida Public Service Commission should not be increasing the handouts to for-profit utility corporations, but that is what has been happening year-after-year. We encourage you to be "fair and reasonable" and keep this rule that helps to balance the needs of the consumer with the needs of the utility — rather than repealing it and effectively offering another corporate utility handout.

Thank you for considering this matter. We urge you to deny the proposal and protect Floridians.

Signed,
Food & Water Watch
Hillsborough Affordable Energy Coalition
Power Floridians Can Afford Coalition
Third Act Florida
Florida Student Power
Poder Latinx
Earth Action, Inc.
ReThink Energy Florida
Sierra Club Tampa Bay Group
Tampa DSA