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Public Service Commission

April 9, 2024

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STAFF'S SECOND DATA REQUEST
Via E-mail

William E. Sexton, Esq.
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Re: Docket No. 20240033-EU - Joint Petition for Approval of Territorial Agreement between Sumter Electric Cooperative, Inc. and the City of Ocala, d/b/a Ocala Electric Utility.

Dear Sirs:

By this letter, the Commission staff requests that Sumter Electric Cooperative, Inc. (SECO) and the City of Ocala (City or Ocala) provide responses to the following data requests:

1. Please refer to the Petitioners' response provided to Staff's Data Request 1, No. 1(e), which references "minor re-draws" to the territorial boundary lines.
 - a. Is it correct that the proposed "re-draws" discussed in the Petitioners' response do not involve the transfer of current customers for either utility? Please explain.
 - b. Is it correct that the "re-draws" referenced in the response are to intended address geographic areas that in some instances have serving facilities, while in other instances, there is lack of serving facilities? Please explain.
 - c. Is it correct that the "re-draws" will adjust boundaries to greatly reduce or eliminate spitting parcels? Please explain.

- d. Please discuss why SECO and Ocala did not “redraw” the boundaries for the 52 and 17 customers that are proposed to be transferred between the utilities in each direction, thereby negating customer transfers?
 - e. As a result of the proposed “re-draws,” how many customers located in Ocala’s territory, but currently inadvertently served by SECO, are proposed to remain SECO customers via a boundary change? (If known, to what class of service do these customers subscribe?)
 - f. As a result of the proposed “re-draws,” how many customers located in SECO’s territory, but currently inadvertently served by Ocala, are proposed to remain Ocala customers via a boundary change? (If known, to what class of service do these customers subscribe?)
 - g. Is it correct that the deployment of modern mapping tools (such as GIS and/or web-mapping) have significantly reduced the number of inadvertent service connections beginning in 2008 and are expected to continue to do so in the future?
2. At this point in time, have the joint petitioners developed construction cost estimates or detailed engineering plans to execute the proposed customer transfers?
 3. If the Commission approves the petition, please describe the expected sequencing and timeframe for executing the proposed customer transfers.
 4. Please refer to the Petition, Attachment 1 (Territorial Agreement), Composite Exhibit A, including a series of maps (identified as Mapbook 1 through Mapbook 17).
 - a. For the maps that collectively include the majority of the proposed 52 customer transfers from SECO to Ocala, please provide scaled diagrams showing the geophysical location of Ocala’s existing and proposed electric grid assets (secondaries, primaries, transformers, etc.) required to serve the customers’ points of delivery. Existing and proposed assets should be separately identified. Please include the approximate distances between the customer locations and the current location of Ocala grid facilities needed to serve these 52 customers. Provide any additional information necessary to understand the relative approximate impacts to construction costs, overhead/underground conversions, adequacy of the facilities to accommodate load growth, and reliability that justify the replacement of SECO facilities with Ocala facilities to these customers. If facilities between the point of delivery and the customer meter require replacement, please include related replacement information as available (e.g. approximate length of service drops, cost impacts, etc.). Please provide a verbal descriptions of symbols used in the diagrams, if applicable.

- b. For the maps that collectively include the majority of the proposed 17 customer transfers from Ocala to SECO, please provide scaled diagrams showing the geophysical location of SECO's existing and proposed electric grid assets (secondaries, primaries, transformers, etc.) required to serve the customers' points of delivery. Existing and proposed assets should be separately identified. Please include the approximate distances between the customer locations (point of delivery) and the current location of SECO's grid facilities needed to serve these 17 customers. Provide any additional information necessary to understand the relative approximate impacts to construction costs, overhead/underground conversions, adequacy of the facilities to accommodate load growth, and reliability that justify the replacement of Ocala facilities with SECO facilities to these customers. If facilities between the point of delivery and the customer meter require replacement, please include related replacement information as available (e.g. approximate length of service drops, cost impacts, etc.). Please provide verbal descriptions of symbols used in the diagrams, if applicable.
5. If the customers proposed to be transferred from SECO to Ocala will incur any additional charges associated with the transfer not otherwise identified in the petition's sample letters, please identify the expected amount and description of all such charges.
6. If the customers proposed to be transferred from Ocala to SECO will incur any additional charges associated with the transfer not otherwise identified in the petition's sample letters, please identify the expected amount and description of all such charges.

Please file all responses electronically no later than **April 30, 2024** through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. In addition, please email the filed response to discovery-gcl@psc.state.fl.us and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please feel free to call me at (850) 413- 6856 if you have any questions.

Sincerely,

/s/ Ryan P. Sandy
Ryan P. Sandy
Senior Attorney

SPS/crv

cc: Office of Commission Clerk