



Public Service Commission

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**DATE:** June 7, 2001  
**TO:** John Haswell, Jeffrey Stone and Other Interested Persons  
**FROM:** Marlene Stern, Division of Legal Services *MKS RVE*  
**RE:** Docket No. 010441-EU - Staff's Proposed Issues

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Below are Staff's proposed issues. If the parties can agree to these issues, we will not need an issue identification meeting next week. Some of them can probably be stipulated.

Staff's issues are drawn from Rule 25-6.0441, Florida Administrative Code, which describes the typical facts that company testimony should contain. Staff added brief explanations of the scope of some of the issues to assist the parties in preparing testimony and conducting discovery.

**1. What are the boundaries of the service area that is the subject of this territorial dispute?**

Scope of issue: establish geographic limits.

- Legal description of the disputed area and maps of the disputed area.
- Written description and maps of existing electric facilities (generation, transmission, and distribution) serving the disputed area and/or immediately in the vicinity of the disputed area.

**2. What conditions have caused the dispute?**

Scope of issue: establish a chronology of each party's activities leading up to the dispute.

- History of meetings, communications, and other events with prospective customers in the disputed area.
- History of meetings, written communications, and other events with existing customers in the disputed area within the past two years.
- What did each utility offer the new/existing customer(s) and when?
- All activities such as installation of electric facilities and rights-of-way acquisition activities undertaken to serve the disputed area.

DOCUMENT NUMBER-DATE

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3. **What is the existing and planned load to be served in the disputed area?**

Scope of issue: establish the load criteria used by the company in its evaluation of the disputed area.

- What has been the historical load and growth in the disputed area?
- What is the expected load and growth for the foreseeable future in the disputed area?
- What is the projected load within the disputed area?

4. **What is the estimated incremental cost to serve the planned load in the disputed area?**

Scope of issue: establish the total cost for each utility's planned additions deemed necessary to meet the projected future load in the disputed area. What are the types of costs?

5. **Are the planned electrical facility additions and other utility services to be provided within the disputed area reasonably expected to cause a decline in the reliability of service to existing and future utility customers?**

6. **What is the nature of the disputed area with respect to its population, the type of utilities seeking to serve it, degree of urbanization, proximity to other urban areas, and the present and reasonably foreseeable future requirements of the area for other utility services?**

7. **What is the cost to each utility to provide distribution and subtransmission facilities to the disputed area presently and in the future?**

cc: Division of Safety and Electric Reliability  
Division of Records and Reporting