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OFFICE OF THE GENERAL COUNSEL
HAROLD A. MCLEAN
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

February 17, 2003

Davisson F. Dunlap, Jr.
Dunlap & Toole, P. A.
2057 Delta Way
Tallahassee, FL 32303

STAFF'S 1ST DATA REQUEST

RE: Docket No. 011333-EU - Petition of City of Bartow to Modify Territorial Agreement or, in the Alternative, to Resolve Territorial Dispute with Tampa Electric Company in Polk County.

Dear Mr. Dunlap:

By this letter, the Commission staff requests that City of Bartow (Bartow or utility) please provide responses to the following data requests:

1. Please provide a list of all existing self service loads, such as pump stations, police stations, fire stations, sewer lift stations, and streetlights, which are not within the City of Bartow's electric territorial boundary, pursuant to Section 2.1 of the territorial agreement approved by Commission Order No. 15473. Please include in your response the location of each such self service load, peak demand, average kwh usage, the name of the feeder serving the self service location, transformer size, date when such self service began, the cost for installing all necessary electric distribution facilities to serve the respective self service load, whether Tampa Electric Company (TECO) was notified pursuant to Section 2.4 of the territorial agreement, and whether the City of Bartow compared the cost to provide self service to the costs of receiving service from TECO for each of the respective self service loads.

The City of Bartow, at paragraph 17 of its October 4, 2001, petition in Docket 011333-EU, indicates that its substations currently have the capacity to serve Old Florida Plantation (OFP). Please explain why the City of Bartow installed capacity sufficient to serve OFP and list the dates that such capacity became available to serve OFP, and the costs associated with installing such capacity.

3. Please provide a copy of the specific language in Commission Orders, Supreme Court Decisions, statutes, rules, and/or ordinances that the City of Bartow relied on to support the opinion expressed in paragraph 16 of its October 4, 2001, petition in Docket 011333-EU that

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

DOCUMENT NUMBER - 011333-EU-001
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FPSC-COMMISSION CLERK

the City of Bartow will self serve north of its territorial boundary.

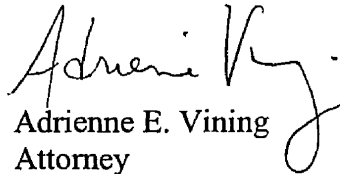
4. Please provide a copy of the work papers, spreadsheets, reports, or other analyses that the City of Bartow relied on to support the view expressed in paragraph 17 of its October 4, 2001, petition in Docket 011333-EU that the City of Bartow can serve the OFP property more economically than can TECO.
5. Please provide a single composite exhibit based on the City's Production of Document Number "BAR-0117". Please include on the composite exhibit the following:
 - a) Pole line distance(s) from the City's proposed facilities to serve Old Florida Plantation to the substation(s) from which the City proposes to serve Old Florida Plantation. Please include the name of the substation(s).
 - b) The existing capacity of the substation transformer that is planned to serve Old Florida Plantation.
 - c) The highest peak load recorded on the substation transformer that is planned to serve Old Florida Plantation.
 - d) Estimated capacity of the substation transformer that is planned to serve Old Florida Plantation at full build out.
 - e) Estimated peak loading of the substation transformer that is planned to serve Old Florida Plantation at full build out.
 - f) Existing electric retail service area boundary.
 - g) Proposed new electric retail service area boundary.
 - h) Estimated total cost for all planned retail electric distribution facilities to serve Old Florida Plantation at full build out.
6. Would a territorial boundary line bisecting the OFP property following the primary entrance road into OFP and then crossing a conservation area to Lake Hancock result in lower construction costs to both the City of Bartow and TECO than the current territorial boundary line? Please explain.
7. Would a territorial boundary line bisecting the OFP property following the primary entrance road into OFP and then crossing a conservation area to Lake Hancock result in higher reliability and better customer service to future customers served by both the City of Bartow and TECO than the current territorial boundary line? Please explain.

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8. Would a territorial boundary line modification following the OFP property such that the City of Bartow was obligated to service the entire OFP property result in lower construction costs, higher reliability and better customer service to future customers than the current territorial boundary line? Please explain.
9. Would a territorial boundary line modification following the OFP property such that the TECO was obligated to service the entire OFP property result in lower construction costs, higher reliability and better customer service to future customers than the current territorial boundary line? Please explain.

Please file the original and five copies of the requested information by March 19, 2003, with Ms. Blanca Bayó, Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6183 if you have any questions.

Sincerely,


Adrienne E. Vining
Attorney

AEV/jb

cc: Division of the Commission Clerk and Administrative Services
Division of Economic Regulation (Breman, D.Lee, Redemann)