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# Public Service Commission

June 30, 2020

Kenneth A. Hoffman  
Vice President, Regulatory Affairs  
Florida Power & Light Company  
134 West Jefferson Street  
Tallahassee, FL 32301-1713  
ken.hoffman@fpl.com

**STAFF'S FIRST DATA REQUEST  
VIA E-MAIL**

Caren Anders  
VP and General Manager, Energy  
JEA  
21 West Church Street  
Jacksonville, FL 32202-3155  
andecb@jea.com

**Re: Docket No. 20200162-EU: Joint petition for approval of amendment to territorial agreement in St. Johns County, by Florida Power & Light Company and JEA.**

Dear Mr. Hoffman and Ms. Anders:

By this letter, Commission staff requests that Florida Power & Light Company (FPL) and JEA provide responses to the following data requests:

- 1) Paragraph 14 of the petition refers to Swap Parcel 4 which will receive electric service from JEA. Please state the number of customers in Swap Parcel 4, and when does JEA expect to have service available to the proposed amended area.
- 2) How far away are JEA facilities from the proposed Swapped Parcel 4?
- 3) Paragraph 15 of the petition states that Swap Parcels 5, 6, and 7 shall receive electric service from FPL. Please state number and type of customers FPL intends to serve in the subject parcels and when does FPL expect to have service available to the proposed Swapped Parcels 5, 6, and 7?
- 4) How far away are FPL facilities from the proposed Swapped Parcels 5, 6, and 7?
- 5) Paragraph 17 of the petition refers to two detailed maps for each affected county. Please explain if the proposed private development is in Duval and St. Johns Counties.

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- 6) Are the swapped parcels 4, 5, 6, and 7 all located in St. Johns County? If not, please provide a breakdown of parcels by county.
- 7) When is development expected to begin within each swapped parcel?
- 8) Please state the number and type of potential customers JEA expects to serve within the proposed amended area?
- 9) Paragraph 18 of the petition states that no customer accounts will be transferred between the parties. Yet, paragraph 9 of the petition state that the agreement will swap parcels and the right to serve customers located or to be located within the parcels. Please discuss this scenario.

Please file all responses electronically no later than July 14, 2020, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at [sguffey@psc.state.fl.us](mailto:sguffey@psc.state.fl.us) or at 850.413.6204 if you have any questions.

Sincerely,

*/s/Sevini Guffey*

Sevini Guffey

Public Utility Analyst III

cc: Office of the Commission Clerk