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October 14, 2020

VIA ELECTRONIC FILING

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Joint petition for approval of modification to territorial agreement in Lake and Sumter Counties by City of Leesburg and Duke Energy Florida, LLC;*
Docket No. 20200201-EU

Dear Mr. Teitzman:

On behalf of Duke Energy Florida, LLC ("DEF"), please find enclosed for electronic filing in the above-referenced Docket, DEF's Response to Staff's First Data Request (Nos. 1-7).

Thank you for your assistance in this matter. If you have any questions concerning this filing, please feel free to contact me at (850) 521-1428.

Sincerely,

/s/ Matthew R. Bernier

Matthew R. Bernier

MRB/cmkn
Attachment

cc: Parties of Record

**Duke Energy Florida, LLC's (DEF) Response to
Florida Public Service Commission's First Data Request (Nos. 1-7)
re. Joint Petition for Approval of Modification to Territorial Agreement
in Lake and Sumter Counties by City of Leesburg and DEF**

Docket No. 20200201-EU

1. Please state the reason(s) for the proposed land exchange and boundary modifications between the parties.

Response:

The purpose of the land exchange is to form more compact and contiguous service territories for future development and to avoid duplication of facilities in these reallocated areas in Sumter and Lake counties.

2. Page 1 of the First Amendment to the Territorial Agreement (Page 5 of 13 of the petition) states that there are no customer transfers within the reallocated area. Please state if there are any existing infrastructure/facilities located in the reallocated areas.

Response:

There is no infrastructure, and there are no customers, in the area being transferred. Such infrastructure as once existed has already been transferred and paid for.

3. If there are any infrastructure/facilities in the reallocated areas, do the parties intend to purchase or exchange them? If so, what is the purchase price to each party? How did the parties arrive at the purchase price?

Response:

The City of Leesburg previously had infrastructure in the area that is proposed to be reallocated to Duke Energy. Such infrastructure as once existed has already been purchased by Duke Energy in the amount of \$33,278.16 and transferred to Duke Energy. This service request issue arose after the approval of the current territorial agreement. The Parties used the Handy Whitman Index to determine the value of the facilities as is set forth in Section 3.4 Compensation for Transferred Facilities.

4. Are the proposed areas to be reallocated currently developed? If so, please discuss the type of development.

Response:

The areas are not currently developed.

5. Do the parties anticipate any new customers in the reallocated areas in the future? If so, please state the estimated number of customers by type.

Response:

Yes, there are conceptual plans for residential development in the area to be reallocated to the City of Leesburg. It is anticipated there will be approximately 900 residential customers.

Currently, there are no conceptual plans for the area to be reallocated to Duke Energy. However, future development in this area is projected to be approximately equivalent to the residential development as expected in the City of Leesburg area.

6. In Docket No. 20150077-EU, page 40 of 68 and page 63 of 68 (written descriptions of the territorial boundary lines) containing map sections 22, 23, 24, 25, 26, 27, 34, 35, and 36 are indicated as “not part of this agreement”. However, in the subject Docket No. 20200201-EU, the corresponding page 9 of 13, most of the sections are indicated as being in DEF’s service territory. Please explain and provide Commission Order number approving this change.

Response:

The map on the proposed amendment page 11 of 12 (map page 15) submitted under Docket No. 20200201-EU correctly shows the updated boundaries as the boundaries pertain to the service territories of the City of Leesburg and Duke Energy.

Duke Energy and the City of Leesburg had a contiguous boundary in sections 24, 25 and 36 in Sumter County in Docket No. 20150077-EU. The enhanced territorial maps in Docket No. 20200201-EU proposes a boundary modification in section 36, Township 19S, Range 23E in Sumter County. Sections 22, 23, 24, 27, 34 and 35 show territorial areas that are related to other territorial agreements (see Order PSC-2020-0279-CO-EU) and not part of the City of Leesburg and Duke Energy territorial agreement.

7. In Docket No. 20150077-EU, 47 of 68 containing map sections 7, 8, 9, 16, 17, and 18 and page 65 of 68 (written descriptions of the territorial boundary lines) are indicated as being in DEF’s service territory. However, in the subject Docket No. 20200201-EU, the corresponding page 10 of 13, part of section 7, 17, and all of 18 are indicated as being “not part of this agreement.” Please explain and provide Commission Order number approving this change.

Response:

The map on the proposed amendment page 12 of 12 (map page 23) submitted under Docket No. 20200201-EU correctly shows the updated boundaries as the boundaries pertain to the service territories of the City of Leesburg and Duke Energy.

Duke Energy and the City of Leesburg had a contiguous boundary in sections 4, 5, 6, 7, 8 and 9 Lake County in Docket No. 20150077-EU. The enhanced territorial maps in Docket No. 20200201-EU proposes a boundary modification in section 6, Township 20S, Range 24E in Lake County. Sections 7, 17 and 18 shows territorial areas that are related to other territorial agreements (see Order PSC-2020-0279-CO-EU) and not part of the City of Leesburg and Duke Energy territorial agreement.