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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

May 10, 2022

Palmer C. Davis
City Attorney
City of Lakeland
228 South Massachusetts Avenue
Lakeland, FL 33801
Palmer.Davis@lakelandgov.net

STAFF'S SECOND DATA REQUEST VIA EMAIL

Sean R. Parker
City Attorney
Boswell & Dunlap LLP
245 South Central Avenue
Bartow, FL 33830
srp@bosdun.com

Re: Docket No. 20220075-EU Joint petition for approval of modification to territorial agreement in Polk County, by City of Lakeland and City of Bartow.

Dear Mr. Davis and Mr. Parker:

By this letter, Commission staff respectfully requests that City of Lakeland, on behalf of Lakeland Electric (Lakeland) and City of Bartow (Bartow), the joint petitioners, provide responses to the following questions.

1. In 2006, when portions of service territory was swapped between Lakeland and Bartow, did the respective utility representatives sign an agreement formalizing the swap? If so, please provide a copy of such signed documentation as proof of the 2006 territory swap.
2. When was the Wind Meadows subdivision (territory swapped to Bartow) built? Is the subdivision fully built out now or would there be new houses and new customers to come online for electric service?
3. Were there any customers in Wind Meadows subdivision when the service territory was swapped in 2006 or was it only a platted subdivision at that time?

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4. Is the new Wind Meadows South subdivision (in Lakeland's service territory) fully built out? When did the 145 customers in the Wind Meadows South subdivision come online as Lakeland's customers?
5. Are there additional phases of Wind Meadows South to be constructed? Would additional new electric customers be coming online?
6. With reference to the statement "because of the planning and construction of new facilities by the parties..." in paragraph 9 of the petition, please explain if the new facilities are to serve the new customers in the new developments or a combination of existing and future customers (Request #2 in Staff's First Data Request).

Please file all responses electronically no later than May 20, 2022 via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at sguffey@psc.state.fl.us or at 850.413.6204 if you have any questions.

Thank you.

/s/Sevini Guffey

Sevini Guffey

Public Utility Analyst III

cc: Office of Commission Clerk