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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

January 16, 2024

STAFF'S FIRST DATA REQUEST
Via E-Mail

Jody Lamar Finklea, Esquire,
On behalf of City of Bushnell, Florida

General Counsel and Chief Legal Officer
Florida Municipal Power Agency
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D. Bruce May, Jr., Esquire,
On behalf of Sumter Electric Cooperative, Inc.

Holland & Knight, LLP
315 South Calhoun Street - - Suite 600
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Re: Docket No. 20230140-EU - Joint Petition of Sumter Electric Cooperative, Inc. and the City of Bushnell, a Florida municipality, for approval of a Modification to a Territorial Agreement in and for Sumter County.

Dear Counsels:

By this letter, the Commission staff respectfully requests Sumter Electric Cooperative, Inc. (SECO) and the City of Bushnell (Bushnell) provide responses to the following questions regarding the above-referenced joint petition.

1. Please refer to the following questions regarding Parcel N14-013.
 - a. How many acres are encompassed in Parcel N14-013?
 - b. Paragraph 3 of the petition references that the proposed amendment is “to serve new construction” [on Parcel N14-013].” Please describe the new construction planned for this parcel. Address in your response the estimated number of new residential and/or commercial customers the new construction will serve in the next 5 to 10 years. Provide supporting documents.
 - c. Describe the nearest Bushnell electric facilities in terms of capacity and proximity to Parcel N14-013.
 - d. Describe the distribution facilities that would need to be constructed from the nearest Bushnell electric facilities in order to serve the new construction on Parcel N14-013. Include in your response approximate distance (linear feet and/or miles) between Bushnell’s interconnection point and the specific location of the new construction on Parcel N14-013.
 - e. State the estimated costs if Bushnell were to construct the facilities necessary to serve the new construction on Parcel N14-013.
 - f. Describe the nearest SECO electric facilities in terms of capacity and proximity to Parcel N14-013.
 - g. Describe the distribution facilities that would need to be constructed from the nearest SECO electric facilities in order to serve the new construction on Parcel N14-013. Include in your response approximate distance (linear feet and/or miles) between SECO’s interconnection point and the specific location of the new construction on Parcel N14-013.
 - h. State the estimated costs if SECO were to construct the facilities necessary to serve the new construction on Parcel N14-013.

2. Please refer to the following questions regarding Parcel N14-015.
 - a. How many acres are encompassed in Parcel N14-015?
 - b. Paragraph 3 of the petition references that the proposed amendment is “to serve new construction” [on Parcel N14-015].” Please describe the new construction planned for this parcel. Address in your response the estimated number of new residential and/or commercial customers the new construction will serve in the next 5 to 10 years. Provide supporting documents.

- c. Describe the nearest Bushnell electric facilities in terms of capacity and proximity to Parcel N14-015.
 - d. Describe the distribution facilities that would need to be constructed from the nearest Bushnell electric facilities in order to serve the new construction on Parcel N14-015. Include in your response approximate distance (linear feet and/or miles) between Bushnell's interconnection point and the specific location of the new construction on Parcel N14-015.
 - e. State the estimated costs if Bushnell were to construct the facilities necessary to serve the new construction on Parcel N14-015.
 - f. Describe the nearest SECO electric facilities in terms of capacity and proximity to Parcel N14-015.
 - g. Describe the distribution facilities that would need to be constructed from the nearest SECO electric facilities in order to serve the new construction on Parcel N14-015. Include in your response approximate distance (linear feet and/or miles) between the SECO's interconnection point and the specific location of the new construction on Parcel N14-015.
 - h. State the estimated costs if SECO were to construct the facilities necessary to serve the new construction on Parcel N14-015.
3. Are there electric distribution facilities on either parcel that are being transferred between the joint petitioners? If applicable, please state the purchase price for the transfer of such facilities.
4. Please state if SECO will receive, or has received, compensation from the City of Bushnell in exchange for the right to serve customers in either parcel. Please discuss your response.
5. Identify what economic considerations were evaluated by the joint petitioners to reach the conclusion that a territorial transfer is in the public interest. Explain in your response how the proposed territorial agreement supports this conclusion (i.e., how or why SECO is

able to extend service into both parcels in an economical manner, whereas the City of Bushnell is not able to).

6. Please discuss how and why the joint petitioners concluded that the territorial transfer of Parcel N14-013 and Parcel N14-015 to SECO would not decrease the reliability and availability of electric service to current or future customers?

7. Please discuss how and why the joint petitioners concluded that the territorial transfer of Parcel N14-013 and Parcel N14-015 to SECO would eliminate the existing or potential uneconomic duplication to current or future customers?

8. Please identify any other relevant factors that are unique to the instant petition, to either parcel, or to these joint petitioners that Staff should consider in evaluating this case.

Please file all responses electronically no later than January 29, 2024 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 akaymak@psc.state.fl.us or at (850) 413-6638 or Michael Barrett at mbarrett@state.fl.us if you have any questions.

Thank you,

/s/Alara Kaymak

Alara Kaymak
Public Utility Analyst

cc: Michael Barrett, Economist Supervisor
Office of the Commission Clerk