



January 26, 2024
Re: Docket No. 20230140-EU

VIA EMAIL

Michael Barrett
Economist Supervisor
Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Attention: Alara Kaymak, Public Utility Analyst

Dear Ms. Kaymak:

RESPONSES TO STAFF'S FIRST DATA REQUEST

Below are the restated questions from Staff's first data request and the parties' joint responses.

1. Please refer to the following questions regarding Parcel N14-013.
 - a. How many acres are encompassed in Parcel N14-013? [5.64 acres](#)
 - 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. [1 Single Family Residence \(Exhibit A\)](#).
 - c. Describe the nearest Bushnell electric facilities in terms of capacity and proximity to Parcel N14-013. [The closest existing Bushnell Electric facilities are approximately 1100 feet due West of Parcel N14-013 but are at capacity to maintain reliability for the existing customers connected to that feed.](#)

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- 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. [Bushnell Electric would have to reconductor a span of primary approximately 3400 feet in order to service 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. [Estimated cost would be no less than \\$50,000 whether one or both customers connect.](#)
 - f. Describe the nearest SECO electric facilities in terms of capacity and proximity to Parcel N14-013. [There is a SECO service line along the Northern part of Parcel that includes a pole on Parcel N14-013 property.](#)
 - 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. [Because SECO already has existing single phase underground primary facilities located along the east property line, it only needed to install an underground pad-mount transformer and approximately 155' of secondary service wire to serve the new single-family home.](#)
 - h. State the estimated costs if SECO were to construct the facilities necessary to serve the new construction on Parcel N14-013. [SECO's total cost billed to the member was \\$939.](#)
2. Please refer to the following questions regarding Parcel N14-015.
 - a. How many acres are encompassed in Parcel N14-015? [2.32 acres](#)

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- 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. [1 Single Family Residence with a pole barn \(Exhibit B\)](#).
- c. Describe the nearest Bushnell electric facilities in terms of capacity and proximity to Parcel N14-015. [The closest existing Bushnell Electric facilities are approximately 1030 feet due West of Parcel N14-015 but are at capacity to maintain reliability for the existing customers connected to that feed.](#)
- 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. [Bushnell Electric would have to reconductor a span of primary approximately 3400 feet to service 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. [Estimated cost would be no less than \\$50,000 whether one or both customers connect.](#)
- f. Describe the nearest SECO electric facilities in terms of capacity and proximity to Parcel N14-015. [SECO’s single phase overhead primary facility is located just south of the existing property line.](#)
- 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. [Because SECO already has an existing single phase overhead primary facility located along the south](#)

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property line, it only needed to install approximately 150' of secondary underground service wire to serve the new single-family home.

- h. State the estimated costs if SECO were to construct the facilities necessary to serve the new construction on Parcel N14-015. **SECO's total cost billed to the member was \$877.**
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. **No electric distribution facilities are being transferred.**
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. **SECO will receive no compensation.**
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). **Based on the cost of construction that Bushnell Electric would have to pass onto the customer, it is in the best financial interest of the customer to allow SECO to serve the two residential customers at issue here.**
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? **After many conversations between Bushnell Electric and SECO, the consensus was that SECO was the better positioned utility to provide cost-effective and reliable services to these two customers, with its facilities closer to the customers and the ability of SECO to provide service at a lower budgetary impact.**
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?

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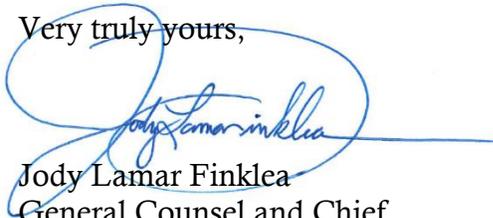
SECO's availability of facilities and minimal cost to extend service provided a much lower infrastructure investment to provide service to these utility customers.

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.

SECO should service the customers on Parcels N14-013 & N14-015 for the following reasons: SECO has existing facilities in a closer proximity than Bushnell Electric, SECO is able to provide the customers a more reliable service based off available capacity, and SECO is able to provide said service installation at a lower cost to the customers.

Please let us know if anything additional is required.

Very truly yours,



Jody Lamar Finklea
General Counsel and Chief
Legal Officer

as counsel for the City of Bushnell, Florida

Enclosures (2)

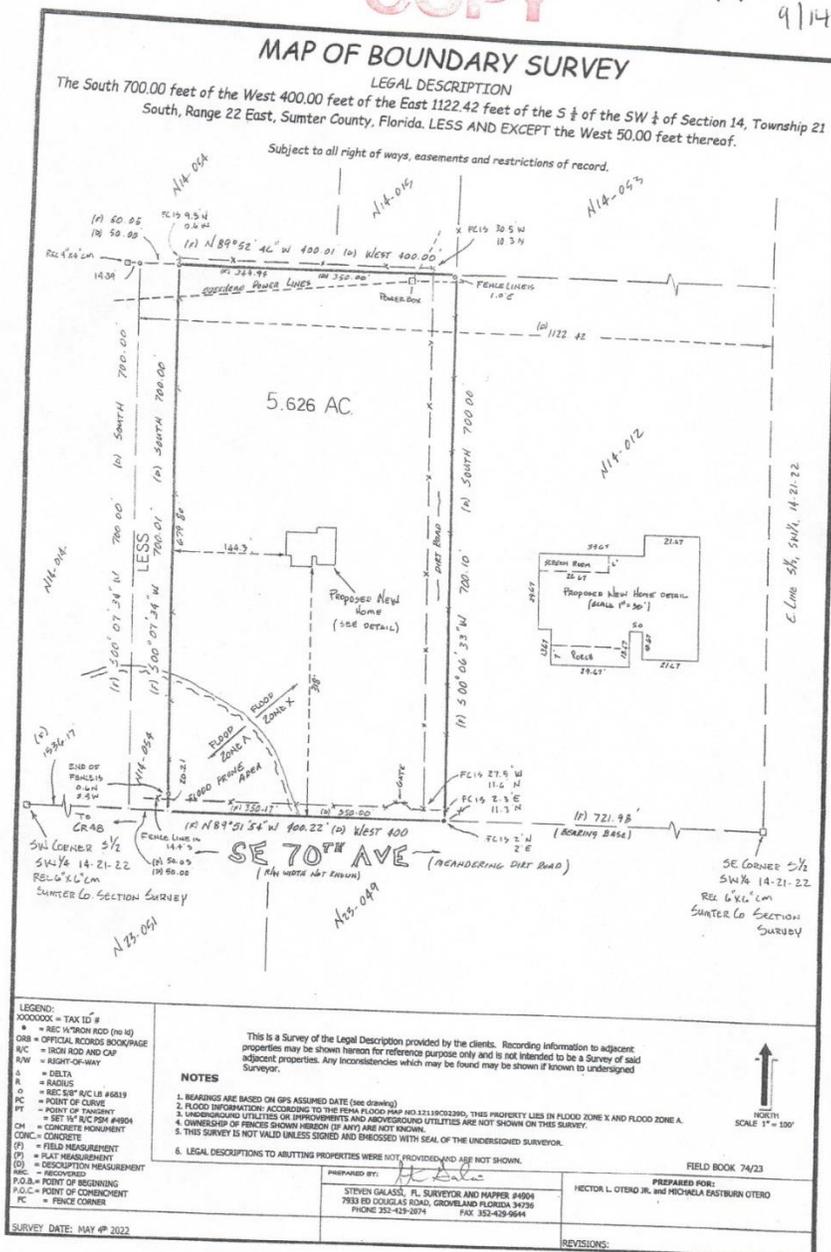
cc: D. Bruce May, Jr.
Tracy de Lemos

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Exhibit A

COPY

Approved for Zoning
 9/14/2022
 K. Green



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Exhibit B

