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Public Service Commission

September 6, 2024

Matthew R. Bernier, Esquire
Duke Energy Florida, LLC.
106 East College Avenue, - Suite 800
Tallahassee, Florida, 32301-7740
matthew.bernier@duke-energy.com

STAFF'S SECOND DATA REQUEST
Via E-Mail

William E. Sexton, Esquire,
City of Ocala
110 SE Watula Avenue
Ocala, Florida 34471-2180
wsexton@ocalafl.gov

Re: Docket No. 20240110-EU - Joint Petition For Approval of Territorial Agreement between Duke Energy Florida, LLC. and the City of Ocala, d/b/a Ocala Electric Utility.

Dear Counsels:

By this letter, the Commission staff respectfully requests Duke Energy Florida, LLC. (DEF) and the City of Ocala (City or Ocala) provide responses to Staff's Second Data Request regarding the above-referenced joint petition.

1. In the Duke Energy Florida, LLC. and the City of Ocala, d/b/a Ocala Electric Utility's Response to Staff's First Data Request (dated August 30, 2024), the response to item number 1.c. states, in part, "the Parties do not anticipate any reduction in customer reliability . . . for the customers subject to transfer."
 - A. Please discuss whether current or future customers (all customers, not just those subject to transfer) of either utility may have a decrease in reliability if the proposed agreement is approved.

- B. While negotiating the proposed boundary line changes, please describe the specific considerations that each utility made to avoid any potential reliability concerns for either utility.
2. In the Duke Energy Florida, LLC. and the City of Ocala, d/b/a Ocala Electric Utility's Response to Staff's First Data Request (dated August 30, 2024), the response to item number 5.a. provides the service addresses and the date service was established for Extra-Territorial customers. In a similar format as that response, please provide the service addresses and the date service was established for *inadvertently served customers that are not being transferred, due to the proposed boundary line changes*. Please provide a separate response for each utility.
3. In the Duke Energy Florida, LLC. and the City of Ocala, d/b/a Ocala Electric Utility's Response to Staff's First Data Request (dated August 30, 2024), the response to item number 5.c. references older paper boundary maps.
- A. Describe generally how such maps were used and/or updated by company personnel, and specifically, how human error could have been a root cause for the inadvertent connections this proposed agreement corrects.
- B. If known, please state the approximate date(s) those resources (the paper boundary maps) were supplanted by computer-generated, and more precise mapping resources.

4. In the Duke Energy Florida, LLC. and the City of Ocala, d/b/a Ocala Electric Utility's Response to Staff's First Data Request (dated August 30, 2024), the response to item number 5.d. states, in part, "that DEF and OEU have shared GIS data files." Please describe how that action (sharing data files) complements the corrective actions and/or internal controls that both parties have implemented to reduce or eliminate inadvertent connections prospectively.

5. In the Duke Energy Florida, LLC. and the City of Ocala, d/b/a Ocala Electric Utility's Response to Staff's First Data Request (dated August 30, 2024), the response to items 6 and 13 is a series of maps. Please refer to Map Pages 1, 2, and 6 to answer the following regarding those maps:
 - A. Map Page 1 of this response uses the term "map adjustments." In general, describe the conditions (or a typical scenario) that would necessitate the need for map adjustments.
 - B. Please specifically describe the map adjustments that are indicated on Map Page 1, and the joint petitioners justification for proposing the referenced adjustments.
 - C. Please specifically describe the map adjustments, and the joint petitioners justification for proposing the adjustments that are indicated on Map Page 2.
 - D. Please specifically describe the map adjustments that are indicated on Map Page 6, and the joint petitioners justification for proposing the referenced adjustments.

6. In the Duke Energy Florida, LLC. and the City of Ocala, d/b/a Ocala Electric Utility's Response to Staff's First Data Request (dated August 30, 2024), the response to items 6 and 13 is a series of maps. Please refer to the Map Index and Map Pages 3, 6, and 9, which identifies locations that are being corrected due to "mapping errors" to answer the following:
 - A. How do the joint parties define the term "mapping error"?
 - B. How did the utility identify the "mapping errors" that appear on Map Pages 3, 6, and 9? Address in your response which utility initially identified the "mapping errors" shown on these pages. Please provide a separate response for each map page (Map Pages 3, 6, and 9).
 - C. Please identify the date (or dates) when the "mapping errors" identified on Map Pages 3, 6, and 9 were found. If different, identify the date (or dates) when the errors were communicated to the other utility of the proposed agreement.
 - D. Please explain whether each utility (DEF, City of Ocala) provided customer connections consistent with the maps approved in Docket No. 20080724-EU from June 2009 to present.
 - E. If the utilities did not use the maps for purposes of identifying new customer connections and/or service extensions, what method/document/program was used to determine such connections in place of the maps? Please explain any corrective actions taken, including dates, technologies, operational changes, etc.
 - F. By utility, identify all customer addresses that were inadvertently served, if any, due to "mapping errors" in the areas identified on Map Pages 3, 6, and 9. Please provide a separate response per map page, and state the approximate locations within each of the maps. Also identify grid changes, if any, that have taken place as a result of the "mapping errors" identified on Map Pages 3, 6, and 9.

- G. Did the “mapping errors” identified on Map Pages 3, 6, and 9 impact any utilities other than DEF and City of Ocala or their customers in any way? If so, please explain.
- H. What planned residential/commercial development(s) is/are DEF or Ocala aware of in the “mapping error” areas shown on Map Pages 3, 8, and 9? Please identify the locations, size, nature of such development(s), and when each utility became aware of such development.
- I. Did DEF and Ocala submit a written description of the territorial boundaries in Docket No. 20080724-EU, similar to that provided in the instant petition at Exhibit B (marked as “D”)? If not, did the lack of a written description in that docket contribute to the mapping errors identified on Map Pages 3, 6, and 9? Please explain.
- J. Please provide documents (e.g. reports, correspondence, emails, etc.) that relates to the mapping errors identified on Map Pages 3, 6, and 9, and efforts taken to correct such errors.

Please file all responses electronically no later than September 23, 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 dprewett@psc.state.fl.us or at (850) 413-6078 or Michael Barrett at mbarrett@state.fl.us if you have any questions.

Thank you,

/s/Devan Prewett

Devan Prewett
Public Utility Analyst

cc: Michael Barrett, Economist Supervisor

Office of the Commission Clerk