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September 30, 2024

VIA ELECTRONIC FILING

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

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

Dear Mr. Teitzman:

On behalf of Duke Energy Florida, LLC (“DEF”), please find enclosed for electronic filing in the above-referenced docket, DEF and Ocala Electric Utility’s Response to Staff’s Second Data Request (Nos. 1-6).

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/ Stephanie A. Cuello

Stephanie A. Cuello

SAC/clg
Enclosures

cc: Devan Prewett and Michael Barrett

Duke Energy Florida, LLC’s (“DEF”) Response to Florida Public Service Commission’s (“FPSC”) Second Data Request (Nos. 1-6) re. Joint Petition for Approval of Territorial Agreement between Duke Energy Florida, LLC. and the City of Ocala, d/b/a Ocala Electric Utility

Docket No. 20240110-EU

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.

Response:

The Parties believe that the proposed customer transfers and map adjustments promote operational efficiency along with clearly delineated territorial boundaries. The proposed customer transfers were reviewed from a sound engineering and operational perspective. Any additional line work to transfer/acquire the customers is minimal and straightforward. Territorial decisions are based on existing boundaries and current and predicted future growth trends and the Parties do not expect any decreased reliability issues, especially as the transferred areas mitigated existing heavy vegetation reliability concerns.

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.

Response:

Both Parties invest significant due diligence efforts to review every customer within the service territory. This is done on both a GIS level and via multiple rounds of field review. In this specific proposed agreement, the proposed boundary adjustments mitigated heavy vegetation reliability concerns and removed duplicative facilities between companies which allows for safer and more efficient outage restoration.

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.

Response:

DUKE ENERGY FLORIDA	
Customer Address	Date of Service
2008 NW 39TH STREET, OCALA 34475	Pre-1980
3810 NW 20TH AVENUE, OCALA 34475	1968
1533 NW 42ND PLACE, OCALA 34475	Pre-1980
1529 NW 42ND PLACE, OCALA 34475	Pre-1980
1525 NW 42ND PLACE, OCALA 34475	Pre-1980
1484 NW 42ND PLACE, OCALA 34475	3/24/1981
1536 NW 42ND PLACE, OCALA 34475	Pre-1980
1526 NW 42ND PLACE, OCALA 34475	Pre-1980
1512 NW 42ND PLACE, OCALA 34475	Pre-1980
3197 SE 54TH CIRCLE, OCALA 34480	Pre-1980
3191 SE 54TH CIRCLE, OCALA 34480	6/15/1999
3185 SE 54TH CIRCLE, OCALA 34480	6/24/1999
3179 SE 54TH CIRCLE, OCALA 34480	7/1/1999
3173 SE 54TH CIRCLE, OCALA 34480	8/15/2002
3167 SE 54TH CIRCLE, OCALA 34480	2/25/2002
3161 SE 54TH CIRCLE, OCALA 34480	12/23/1999
3155 SE 54TH CIRCLE, OCALA 34480	2/21/2000
3149 SE 54TH CIRCLE, OCALA 34480	8/28/2000
3143 SE 54TH CIRCLE, OCALA 34480	10/25/99
3137 SE 54TH CIRCLE, OCALA 34480	9/26/2000
3131 SE 54TH CIRCLE, OCALA 34480	1/26/2004
1547 SE 59TH STREET, OCALA 34480	11/15/1995
1535 SE 59TH STREET, OCALA 34480	2/13/2004
381 SE 80TH STREET, OCALA 34480	Pre-1980
315 SE 80TH STREET, OCALA 34480	3/22/1989
291 SE 80TH STREET, OCALA 34480	8/11/1993
302 SE 80TH STREET, OCALA 34480	Pre-1980
8065 SE 3RD COURT, OCALA 34480	12/15/1983
270 SE 80TH PLACE, OCALA 34480	1968
294 SE 81ST STREET, OCALA 34480	11/16/1987
8075 SE 3RD COURT, OCALA 34480	Pre-1980
291 SE 81ST STREET, OCALA 34480	Pre-1980
8091 SE 3RD COURT, OCALA 34480	Pre-1980
8121 SE 3RD COURT, OCALA 34480	Pre-1980
8165 SE 3RD COURT, OCALA 34480	Pre-1980
280 SE 81ST PLACE, OCALA 34480	Pre-1980
280 SE 82ND PLACE, OCALA 34480	1968
8213 SE 3RD COURT, OCALA 34480	Pre-1980
301 SE 82ND PLACE, OCALA 34480	6/21/1985
330 SE 82ND PLACE, OCALA 34480	11/10/2005
3947 N US HIGHWAY 441, OCALA 34475	Pre-1980

Ocala Electric Utility	
Customer Address	Date of Service
7810 NE JACKSONVILLE ROAD, OCALA, FL	Pre-1965 (1947)
7810 NE JACKSONVILLE ROAD, APT #2, OCALA, FL	Pre-1965 (1947)
7810 NE JACKSONVILLE ROAD, APT #3, OCALA, FL	Pre-1965 (1947)
7810 NE JACKSONVILLE ROAD, APT #4, OCALA, FL	Pre-1965 (1947)
2025 NW 38TH PLACE, OCALA, FL	JUL 2004
1425 NE 63RD STREET, OCALA, FL	OCT 2000
5223 SE 38TH STREET, OCALA, FL	1963
3409 SE 33RD COURT, OCALA, FL	1967
3401 SE 35TH STREET, OCALA, FL	1967
3421 SE 35TH STREET, OCALA, FL	1967
3501 SE 35TH STREET, OCALA, FL	1967
3408 SE 36TH AVENUE, OCALA, FL	1966
3409 SE 35TH COURT, OCALA, FL	1967

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.

Response:

DEF uses an engineering system that is open to all company personnel. The territorial boundaries are displayed within. When a new customer is connected, the engineering system is updated to show the new customer. Over the last three years, the DEF territorial has had individual meetings to educate internal employees of the territorial boundaries to avoid inadvertent services.

Ocala also uses a GIS-based engineering system which shares an electric territory “layer” with the other City utility layers to provide a single source for coordinating service responsibilities. For the service territory outside the City limits, but still within Marion County, Ocala Electric Utility (OEU) provides the same GIS information. All new customer service location requests must be handled by the OEU Engineering group and must be designed within the GIS-based system that precisely delineates the most current territory boundaries for all adjacent utilities. That technical control ensures that no new services will be inadvertently connected. This agreement will resolve all past inadvertent services that predated the GIS-based design system.

- 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.

Response:

The Parties have been incrementally updating the territorial maps internally since negotiations began in 2019. A final version of the updated boundaries will be made available internally should the Commission approve the proposed territorial agreement.

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.

Response:

DEF and OEU are sharing the data via GIS shape files to ensure that both utilities have clearly defined the service territories. This allows for each utility to concentrate on their own respective service areas which lets both utilities to more operate more efficiently and improve their service to customers. As DEF has a large footprint across the state, the territorial team will continue to educate internally on the territorial boundaries.

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.

Response:

Map adjustment is a general term for scenarios such as: cleaning up split parcels, redrawing parcels when one utility is encroaching in another utilities territorial and it makes operational sense that that utility continues to serve permanently; to make adjustments remove the need for duplicative and dangerous facilities and to make decisions to operationally, safely, efficiently and financially best serve current and future customers.

- b. Please specifically describe the map adjustments that are indicated on Map Page 1, and the joint petitioners justification for proposing the referenced adjustments.

Response:

The Parties have reviewed the map adjustments on this page and have found that all of the indicated parcels should be displayed as Ocala's territory. The hatch marks indicating the

parcels were transferring from DEF to Ocala are incorrect and were placed in error. The map attached in the original filing is correct.

- c. Please specifically describe the map adjustments, and the joint petitioners justification for proposing the adjustments that are indicated on Map Page 2.

Response:

This parcel was redrawn (map adjustment only as this is split vacant parcel between DEF and Ocala - no customers involved). DEF has facilities on the west side of the railroad tracks and Ocala has facilities on the east side of the railroad tracks. Ocala can serve any future customers more efficiently, safely and without excessive costs and time associated with obtaining a permit to cross the railroad tracks.

- d. Please specifically describe the map adjustments that are indicated on Map Page 6, and the joint petitioners justification for proposing the referenced adjustments.

Response:

Section 031: For the parcels adjacent to the east side of Highway 301, these are split parcels clean-up map adjustments. No customers are being transferred. The map adjustment was made to avoid confusion with any future requests for service at this location.

For the parcels on the west side of Highway 301, this street is currently being served by DEF. The DEF distribution line traveling down this road crosses Highway 301 to serve customers in DEF's service territory. If Ocala were to serve these customers, this would create dangerous and duplicative crossings between the two utilities. For this reason, both utilities agreed to permanently adjust the maps and place these customers within DEF's service territory.

Section 032: The hatch marks indicating the parcels on NE 2nd Court were transferring from DEF to Ocala are incorrect and were placed in error. These parcels are already in Ocala's territory. The map as attached in the original filing is correct.

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"?

Response:

A mapping error is showing a parcel or land area in one utilities service territory when it should be served by the other neighboring utility.

- 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).

Response:

During face-to-face discussions, the utilities jointly discussed this area of service territory. The areas in the three map pages (3, 8, and 9) were outlined and delineated in the territory agreement between Ocala and Clay Electric Cooperative. The area north of NE 97th St and NE 90th St. Rd. previously shown as Duke’s territory is Clay Electric’s territory. The other “correction” areas align with the approved Ocala and Clay Electric territory map. These areas were previously outside of Duke’s territory, so there is no impact on the new agreement Ocala and Duke maps. This corrects any previous versions of maps that may have reflected this area as DEF’s service territory.

- 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.

Response:

Ocala and DEF met in a series of face-to-face meetings between early 2019 and 2024 to discuss and negotiate the territorial areas. To the best of the Parties recordkeeping, this area was discussed at the in-person meeting on June 6, 2022.

- 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.

Response:

Yes, the territorial boundary maps approved by the Public Service Commission in Docket No. 20080724-EU have been used to determine which utility serves the specific territorial areas. The DEF and Ocala connections have been consistent with the Docket No. 20080724-EU from June 2009 to present. At no time has Ocala served any customer previously identified as being within Duke’s territory in the Map 3, 8, and 9 areas.

- 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.

Response:

The process is to use the territorial boundary maps when determining what utility should serve a customer. Over the last three years, DEF has done educational in-person meetings with customer facing employees to ensure they are aware of mapping resources and the territorial boundaries when determining the appropriate utility to serve the customer. Ocala has also performed increased training over the last 5-7 years. The paper maps recorded with the 2009 agreement lacked the resolution necessary to avoid all mistakes. The new GIS technology allows the detailed resolution to identify by specific parcel where the territory boundaries are.

- 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.

Response:

DEF did not serve any customers on pages 3, 8 & 9 (page 6 excluded from this response). DEF does not have any facilities in these proposed adjusted areas to serve customers. At no time has Ocala serve any customer previously identified as being within Duke’s territory in the Map 3, 8, and 9 areas. This specific area has very limited customer service due to the various forestry and other protected area designations.

- 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.

Response:

DEF and Ocala are not aware of any customer impacts to other utilities.

- 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.

Response:

This specific area has very limited customer service due to the various forestry and other protected area designations. The majority of this territory is prairie/swamp/wetlands and unlikely to be developed.

- 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.

Response:

A full written description of the territorial boundaries in Docket No. 20080724-EU was not included with that agreement. The Parties believe the written descriptions, accompanied by detailed GIS based mapping helps to avoid mapping errors. The Parties believe that if there are any discrepancies between the written descriptions and the maps, the maps should prevail as demonstrating the territorial boundaries as they are extracted from the shared GIS data.

- 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.

Response:

Ocala and DEF held face-to-face meetings between 2019 and 2022 to verbally discuss and negotiate these territorial areas. Once the discussion and agreement was made, the proposed territorial maps were adjusted and submitted for PSC approval in the recent filing. These areas are best served by Ocala, as Ocala has existing infrastructure in these areas. As such, there are no documents responsive to this request.