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STATE OF FLORIDA



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# Public Service Commission

January 10, 2025

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**STAFF'S FIRST DATA REQUEST**  
Via E-Mail

Malcolm N. Means  
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Tallahassee, Florida 32302-0391  
mmeans@ausley.com

**Re: Docket No. 20240171-EU - Joint Petition For Approval of Temporary Services between Tampa Electric Company and the City of Lakeland, d/b/a Lakeland Electric**

Dear Counsels:

By this letter, the Commission staff respectfully requests Tampa Electric Company (TECO) and the City of Lakeland (City, or Lakeland) provide responses to Staff's First Data Request regarding the above-referenced joint petition.

1. Paragraph 3 of the Joint Petition (Petition) states, in part, that "Tampa Electric has requested Lakeland Electric to extend and provide retail electric service to 39 lots within a new development, referred to as Shaller Preserve Subdivision, currently located within Tampa Electric Company's Commission approved retail electric service territory."
  - A. Paragraph 3 states that the Petition, if approved, would allow Lakeland Electric to extend electric service to an identified portion of the Shaller Preserve Subdivision on a temporary basis (i.e. temporary service agreement, per Agreement, Article II, Section 2.2). Please describe with specificity what temporary service will be provided, what end-use customers will receive that service, when such service will be initiated, and under what tariff such service would be provided.
  - B. What is the approximate route distance (in footage) from the Shaller Preserve Subdivision to the nearest connection point to Lakeland Electric grid facilities? Describe the facilities required to gain access to the subdivision.

- C. Please provide an estimate of the construction costs Lakeland Electric would incur in order to provide temporary service Shaller Preserve Subdivision.
  - D. What is the approximate route distance (in footage) from the Shaller Preserve Subdivision to the nearest Tampa Electric grid facilities?
  - E. If Tampa Electric were to serve the Shaller Preserve Subdivision (rather than pursue the actions proposed in this pleading), what estimated construction costs would it incur to do so?
  - F. Assuming approval of the instant pleading, will the serving facilities that Lakeland Electric will provide be installed for temporary service (to later be removed), or will they instead be installed as permanent facilities?
  - G. Provide any documents, worksheets, or work papers that provide support for Lakeland Electric extending facilities and providing retail electric service to Shaller Preserve Subdivision to avoid uneconomic duplication of services.
  - H. What is the proposed schedule of development of electric service installations and grid development to serve Shaller Preserve, assuming the Commission approves the Petition at its March 4, 2025 Agenda Conference?
2. Paragraph 3 of the Joint Petition states, in part, that “Lakeland Electric . . . [requests] Tampa Electric to extend and provide retail electric service to a new development, referred to as Phase 2 of Cadence Crossing, currently located within Lakeland Electric’s Commission approved retail electric service territory.”
- A. Paragraph 3 states that the Petition, if approved, would allow Tampa Electric to extend electric service to an identified portion of Cadence Crossing on a temporary basis (i.e. temporary service agreement, per Agreement, Article II, Section 2.2). Please describe with specificity what temporary service will be provided, what end-use customers will receive that service, when such service will be initiated, and under what tariff such service would be provided.
  - B. What is the approximate route distance (in footage) from Phase 2 of Cadence Crossing to the nearest connection point to Tampa Electric grid facilities? Describe the facilities required to gain access to the subdivision.
  - C. Please provide an estimate of the construction costs Tampa Electric would incur to provide temporary service to Phase 2 of Cadence Crossing.

- D. What is the approximate route distance (in footage) from Phase 2 of Cadence Crossing to the nearest Lakeland Electric grid facilities?
  - E. If Lakeland Electric were to serve Phase 2 of Cadence Crossing (rather than pursue the actions proposed in this pleading), what estimated construction costs would it incur to do so?
  - F. Assuming approval of the instant pleading, will the serving facilities that Tampa Electric will provide be installed for temporary service (to later be removed), or will they instead be installed as permanent facilities?
  - G. Provide any documents, worksheets, or work papers that provide support for Tampa Electric extending facilities and providing retail electric service to Phase 2 of Cadence Crossing to avoid uneconomic duplication of services.
  - H. What is the proposed schedule of development of electric service installations and grid development to serve Phase 2 of Cadence Crossing, assuming the Commission approves the Petition at its March 4, 2025 Agenda Conference?
3. Identify the specific facts and circumstances that impeded the Joint Parties from preparing a comprehensive territorial agreement amendment filing, compliant with the requirements of Rule 26-6.0440, F.A.C.
  4. For the purpose of this question, please refer to Exhibit A, Letter of Intent, attached to the Joint Petition.
    - A. Part 1, Section 1 states, in part, that “The parties will each begin engineering and design to accomplish service in their respective revised service territories ... and that no facilities may actually be installed unless or until the FPSC issues a final, non-appealed order approving the new service boundaries.” The Joint Petition, in Paragraph 6, requests that the Commission approve the provision of retail electric service. Please reconcile what appears to be conflicting statements.
    - B. Part Two, Section 2(a) states, in part, that the Evaluation Period is expected to continue until June 30, 2025. How do the Parties intend to advise the Commission of Letter of Intent termination (before June 30, 2025) or extension?

5. Have the Parties identified facilities to be transferred, if any, and the method to determine the pricing of such facilities?
  
6. Provide any documents that demonstrate the reasonable likelihood that the proposed actions identified in this pleading will not cause a decrease in the reliability of electrical service to existing or future ratepayers for either party. If no such documents exist, please explain the expectation of management regarding reliability impacts and what those expectations are based on.
  
7. Provide any documents that demonstrate that the approval of this pleading is in the public interest. If no such documents exist, please explain the expectation of management regarding how approval of this pleading is in the public interest and what those expectations are based on.
  
8. Please refer to Petition, Paragraph 5. What is the date the Letter of Intent (Exhibit A) was signed by both parties?
  
9. Please refer to Petition, Exhibits B and C, second to last paragraph. Please confirm that this language indicates that the temporary service agreements expire, but the facilities are not meant to be temporary and are instead anticipated to be permanent. If this is not the meaning of these paragraphs, please explain.

Please file all responses electronically no later than January 21, 2024 via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at [dprewett@psc.state.fl.us](mailto:dprewett@psc.state.fl.us) or at (850) 413-6078 or Michael Barrett at [mbarrett@psc.state.fl.us](mailto:mbarrett@psc.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