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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

January 30, 2025

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STAFF'S SECOND DATA REQUEST
Via E-Mail

Malcolm N. Means
Post Office Box 391
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 Second Data Request regarding the above-referenced joint petition.

1. The Joint Petitioners' response to Question 3 of Staff's First Data Request states, in part, "The Joint Parties are in fact preparing a comprehensive territorial amendment filing."
 - A. The Petitioners' Letter of Intent appears to limit the upcoming territorial agreement to the boundary modifications to those identified in the Petition, but we are seeking further clarification on this point. Is the comprehensive territorial agreement amendment currently being prepared expected to include:
 - (1) Boundary changes other than those pertaining to these two developments (Schaller Preserve and Cadence Crossing)? Please explain.
 - (2) If "yes" to (1), would such boundary line changes necessitate customer transfers from TECO to Lakeland and/or Lakeland to TECO? Please explain.
 - (3) If "yes" to (1), do such additional boundary line changes contribute to the time consuming and labor intensive process referenced in the Petitioner's response? Please explain.

- (4) If “yes” to (1), identify the specific facts and circumstances that impeded the joint parties from timely preparing a territorial agreement amendment filing limited to the two developments (Schaller Preserve and Cadence Crossing Phase 2), thereby potentially eliminating the need for the proposed temporary service agreement.
- B. Please identify the specific tasks required for making a comprehensive territorial agreement filing, specific to this case, that are time consuming and labor intensive.
2. Please specify any further amendments to the existing territorial agreement or other matters not specifically discussed in the parties’ response to Question 1 above that the parties plan to include in the “comprehensive territorial agreement amendment filing.”
3. In the Joint Petitioners’ response to Staff’s First Data Request, the joint parties provided information to staff on estimated construction costs (in the responses to Questions 1.C., 1.E., 2.C. and 2.E.).
- A. Please identify any other costs (types and estimated amounts), not otherwise included in the construction cost estimates provided in the Petitioners’ responses, that TECO would incur in order to provision service to these two developments (Schaller Preserve and Cadence Crossing)? Examples may include engineering, design, administrative, legal, O&M, etc..
- B. Please identify any other costs (types and estimated amounts), not included in the construction cost estimates provided in the Petitioners’ responses, that Lakeland would incur in order to provision service to these two developments (Schaller Preserve and Cadence Crossing)? Examples may include engineering, design, administrative, legal, O&M, etc..
4. Please refer to the Petition, Paragraph 5, which discusses the time constraints of developer’s design and equipment purchase decisions.
- A. Please provide a comprehensive schedule of events and actions leading to the Parties’ necessity to seek approval of the proposed temporary service arrangement in this case rather than directly filing a petition for the temporary service agreement.
- B. Based on such schedule/actions, please identify if there were any opportunities wherein the need for Commission approval of temporary service arrangements could have been avoided in this case. Please explain.

Please file all responses electronically no later than February 6, 2025 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@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