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Public Service Commission

February 25, 2025

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STAFF'S FIRST DATA REQUEST
via email

Stephanie A. Cuello, Esquire
Representing Duke Energy Florida, LLC
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
Stephanie.cuello@duke-energy.com

RE: Docket No. 20250030-EU - Joint petition for approval of territorial agreement in Dixie, Gilchrist, Levy, Marion, and Alachua Counties by Central Florida Electric Cooperative and Duke Energy Florida, LLC.

Dear Counsels:

By this letter, the Commission staff respectfully requests Central Florida Electric Cooperative (CFEC) and Duke Energy Florida, LLC (DEF), or joint petitioners, if applicable, provide responses to Staff's First Data Request regarding the above-referenced joint petition.

1. Paragraph 4 of the Joint Petition (Petition) states, in part, that "To best avoid duplication of services and wasteful expenditures, as well as to best protect the public health and safety from potentially hazardous conditions, the Joint Petitioners have negotiated this Agreement delineating their respective service boundaries in Dixie, Gilchrist, Levy, Marion and Alachua counties." Section 0.9 of the proposed territorial agreement also reflects similar language.

- a) The parties have indicated that the proposed territorial agreement will result in the transfer of 256 customers currently receiving electric service to the other utility. Please provide the analysis that demonstrates the proposed territorial agreement will result in the avoidance of uneconomic duplication of facilities and wasteful expenditures. Include all relevant comparative cost and engineering analyses, electric service area load growth projections, and summary documentation. If the purchase and re-use of existing facilities are expected, please specify in as much detail as may be available the extent of such re-use.
- b) Please explain how the proposed territorial agreement best protects public health and safety from potentially hazardous conditions, and provide any examples that will be avoided by this agreement.
- c) Please address how the proposed boundary change will not impair the provision of reliable electric services for current or future ratepayers of either utility.
- d) Section 0.4 indicates that the parties' prior territorial agreements expired in 2007 and 2014, but are still in effect without notice of termination by either party for the intervening years. Please explain the specific conditions, facts, and circumstances that have motivated the parties to seek approval of a comprehensive territorial agreement at this time.

2. Paragraph 6 of the Petition reflects, in part, that 256 customers (211 from CFEC to DEF and 45 from DEF to CFEC) are proposed to be transferred, and Section 3.1 of the proposed territorial agreement states that affected customers subject to transfer were sent written notification of the proposed agreement and the transfer provisions.
 - a) What date or dates were on the notification letters issued to all 211 CFEC to DEF transfer customers (referencing the sample letter from CFEC provided in Exhibit E to the Petition)?
 - b) What date or dates were on the notification letters issued to all 45 DEF to CFEC transfer customers (referencing the sample letter from DEF provided in Exhibit E to the Petition)?
 - c) Please explain why the CFEC notification letter referenced rate comparisons based on September 2023 rates, which is more than a year prior to the filing date of Petition (February 3, 2025)?
 - d) What were the bill amounts and the bill amount differences for CFEC and DEF for residential customers using 1,000 kilowatt-hours of electricity per month:
 1. As of the earliest date(s) shown on the joint petitioners notification letters.
 2. As of the date the Petition was filed (February 3, 2025)?

- e) Considering the size of the bill amount differences reported in the response to Data Request 2.D. above, please identify what options or considerations, if any, the joint petitioners evaluated to mitigate the monthly price difference the CFEC customers transferring to DEF will be subject to paying, if the Petition is approved (e.g., rate freeze for a period of time, step increases, or similar actions).
 - f) Pending approval of the Petition, what plans do the joint petitioners intend to implement to respond to customers' concerns (e.g., bill impacts, local control, service disruption, or others). If applicable, provide separate responses for each utility.
3. Section 3.2 of the proposed territorial agreement refers to Exhibits B and C, which list the service addresses or other identifying factors for the 256 proposed transfers (211 from CFEC to DEF and 45 from DEF to CFEC). What were the date(s) Exhibits B and C were prepared, and have any new customer service addresses been added (and subject to transfer)? If so, provide a specific response by County that states the number and customer classes of such customers.
4. Provide a list of all CFEC customer addresses that are physically located within DEF's service territory for the five counties included in the proposed territorial agreement. Please organize the list by County and include the following information:
- a) For each address, state the customer type (residential or commercial).

b) For each address, briefly state why CFEC is serving them, expressly affirming whether the customer is:

1. currently a Temporary Service customer; or
2. currently being inadvertently served; or
3. currently being served for some other reason (specify).

Note: If all such addresses exactly match the addresses otherwise provided in Exhibit B, please so state and joint petitioners can avoid responding to the data portion of this question.

5. Provide a list of all DEF customer addresses that are physically located within CFEC's service territory for the five counties included in the proposed territorial agreement.

Please organize the list by County and include the following information:

a) For each address, state the customer type (residential or commercial).

b) For each address, briefly state why DEF is serving them, expressly affirming whether the customer is:

1. currently a Temporary Service customer; or
2. currently being inadvertently served; or
3. currently being served for some other reason (specify).

Note: If all such addresses exactly match the addresses otherwise provided in Exhibit C, please so state and joint petitioners can avoid responding to the data portion of this question.

6. Exhibit C provides the list of the 211 customer addresses that are subject to the proposed transfer from CFEC to DEF. For each address shown in Exhibit C, please provide the following information:
 - a) Briefly indicate why each address is subject to the proposed transfer from CFEC to DEF, expressly affirming whether the customer is:
 1. currently a Temporary Service customer; or
 2. currently being inadvertently served (with explanation); or
 3. associated with a proposed boundary line change; or
 4. subject to transfer for some other reason (specify).
 - b) For each address, please identify which Map Key Page or Pages (referencing the Map Key Pages in Exhibit A to the Petition) contain the location of this address.

7. Exhibit B provides the list of the 45 customer addresses that are subject to the proposed transfer from DEF to CFEC. For each address shown in Exhibit B, please provide the following information:
 - a) Briefly indicate why each address is subject to the proposed transfer from DEF to CFEC, expressly affirming whether the customer is:
 1. currently a Temporary Service customer; or
 2. currently being inadvertently served (with explanation); or
 3. associated with a proposed boundary line change; or
 4. subject to transfer for some other reason (specify).

- b) For each address, please identify which Map Key Page or Pages (referencing the Map Key Pages in Exhibit A to the Petition) contain the location of this address.

8. Please identify which Map Key Page or Pages (referencing the Map Key Pages in Exhibit A to the Petition) contain areas that are subject to proposed boundary line changes that are unrelated to any of the proposed customer transfers.

9. Paragraph 7 of the Petition reflects, in part, that CFEC received approximately 30 comments regarding the notification letters it issued.
 - a) Of the 30 comments received, please identify the number of customers who responded by each of the following methods: phone, email, regular mail, or other means (please specify). For each such method, please describe the actions the utility took, if any, in responding to those comments.

 - b) Have any new customer comments or notices been received by either utility since the joint petitioners filed the instant petition? If applicable, provide a detailed response (number of complaints, nature of complaints, etc.).

 - c) Are CFEC or DEF aware of any community response other than from direct customers about the proposed territorial agreement? If so, please explain.

10. Please refer to Section 0.4 of the proposed territorial agreement, which states that the prior agreements (a 1992 Agreement in Dixie and Gilchrist Counties, and a 2005 Agreement in Levy and Marion Counties) expired in February 2007 and June 2014, respectively.
 - a) Please explain why the 1992 Agreement and the 2005 Agreement were not renewed prior to the expirations in 2007 and 2014.
 - b) Please discuss how, or if, CFEC and DEF, as parties to the 1992 Agreement (Dixie and Gilchrist Counties) and the 2005 Agreement (Levy and Marion counties), met their respective obligations under the Agreements after the agreements' expiration dates. If applicable, note and explain any exceptions.

Please file all responses electronically no later than Wednesday, March 10, 2025 through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

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.

Sincerely,

/s/ Devan Prewett
Devan Prewett
Public Utility Analyst

cc: Michael Barrett, Economist Supervisor
Office of the Commission Clerk