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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

March 8, 2018

Bryan S. Anderson, Esq.
Assistant General Counsel – Regulatory
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
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STAFF'S FIRST DATA REQUEST
via e-mail

Re: Docket No. 20170236-EU - Joint Petition of Florida Power & Light Company and City of Vero Beach to Terminate Territorial Agreement.

Dear Mr. Anderson:

By this letter, the Commission staff respectfully request the following information from Florida Power & Light Company.

1. Paragraph 3 of the petition states that City of Vero Beach electric utility (COVB) serves approximately 34,000 customers. Please provide the number of COVB customers by customer class who will become FPL customers.
2. FPL's tariff sheets Nos. 3.020 and 3.010 need to be revised if the Commission approves the instant petition. Please state when FPL will file these revised tariff sheets.
3. Please provide a revised Exhibit B (to the petition) map of FPL's new service territory in Indian River County (assuming Commission approval of the instant petition).
4. Paragraph 13 of the petition asserts that this transaction/termination of the territorial agreement is projected to result in more economical service to the COVB customers and to FPL's current customers. Please elaborate on this statement and state with examples how this transaction is economical. Please also discuss what type of energy saving programs the newly acquired customers could participate in that was not previously available to them.
5. Paragraph 14 of the petition states that the termination of the territorial agreement will result in excellent service and reliability for COVB's customers and that FPL's SAIDI has been extremely favorable. Please explain and discuss how the termination of the

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agreement will provide service reliability and provide assurance(s) that the newly acquired COVB customer base will not decrease the reliability of electric service to the existing FPL customers and rate payers.

6. Paragraph 15 of the petition states that the termination of the agreement will eliminate existing or potential uneconomic duplication of facilities. Please discuss in detail how the termination of the territorial agreement will eliminate existing or potential uneconomic duplication of facilities.
7. Have the potential customers of COVB been informed of the termination of the COVB-FPL territorial agreement? Please provide details of how the customers have been informed.
8. What is the degree of acceptance of FPL as the new electric service provider to COVB customers?
9. For the following question, please refer to the petition in Docket No. 20170235-EU. Please provide an updated Exhibit TCC-1 of Witness Cohen testimony reflecting current FPL rates (i.e., rates effective March 2018) and updated COVB rates (if updated)

Please file all responses electronically no later than March 23, 2018, 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 sguffey@psc.state.fl.us or at 850.413.6204 if you have any questions.

Thank you,

/s/Sevini Guffey

Sevini Guffey
Public Utility Analyst I

Cc: Office of the Commission Clerk