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DIVISION OF ECONOMICS
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Public Service Commission

April 21, 2020

Dianne M. Triplett, Esq.
Deputy General Counsel
Duke Energy Florida
P. O. Box 14042
St. Petersburg, FL 33733-4042
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STAFF'S FIRST DATA REQUEST
via e-mail

Floyd R. Self, B.C.S.
Berger Singerman, LLP
313 North Monroe Street
Suite 301
Tallahassee, FL 32301

Re: Docket No. 20200106-EU: Joint petition to approve territorial agreement in Sumter, Lake, Marion, Levy, and Citrus Counties by Sumter Electric Cooperative, Inc. and Duke Energy Florida, LLC.

Dear Ms. Triplett and Mr. Self:

By this letter, Commission staff requests that Sumter Electric Cooperative (SECO) and Duke Energy Florida, LLC (DEF) provide responses to the following data requests:

Please refer to the joint petition for the following questions:

1. Paragraph 4 states that all planned customer and facility transfers will be completed "as sound engineering, customer growth and development, and other economic considerations allow." Please describe the steps involved in facility transfers, and approximate time frame necessary for the petitioners to complete facility transfers.
2. Paragraph 5 states that 546 customers will be transferred from DEF to SECO and 49 customers will be transferred from SECO to DEF. Please discuss if the customer transfers will be conducted in phases and if so, in how many phases, number of customers per phase, and length of time to complete the phased customer transfers.
3. Please explain which facilities, if any, will be transferred by DEF to SECO and the associated transfer costs.

4. Please explain which facilities, if any, will be transferred by SECO to DEF and the associated transfer costs.
5. Please discuss if the petitioners currently have the capacity and ability to reliably serve the additional customers who are being transferred without negatively impacting their existing customer base?

Please refer to the territorial agreement for the following questions:

6. Section 0.7 desire to avoid and eliminate duplication of facilities and hazardous conditions. Please discuss what circumstances have given rise to duplication of facilities and what future circumstances would result in potential duplication of facilities and hazardous conditions in the future.
7. Sections 1.8, 2.3, 2.3.3, and 2.4 relates to temporary customers and temporary electric service.
 - a. Please explain the reasons for temporary nature of the customers and service and for how long would these temporary customers remain in temporary status.
 - b. Would these temporary customers eventually become permanent customers of DEF or SECO or do the parties contemplate the transfer of these customers back to their original service provider?
8. Section 4.3 refers to DEF facility or facilities located in SECO's service territory. What are the types of DEF facilities to be located in SECO's service territory and reasons for DEF facilities to be located in SECO's service territory?
9. Section 4.4 refers to limited retail service to be allowed in the other party's service territory.
 - a. Does the proposed agreement contemplate specific or targeted retail accounts to be served in this manner?
 - b. Please explain why such accounts would not be transferred to either of the utility so as to avoid extra-jurisdictional service.
10. Page 12 includes two sections labeled 2.5. Please remedy the scrivener's error.

Please refer to the consumer correspondence (Document No. 01969-2020) filed on April 15, 2020 for the following questions:

11. Please confirm that DEF owns the overhead facilities which are labeled as such, in the attachments to the consumer correspondence.
12. If so, please confirm that the pictured facilities are maintained in DEF's tree trimming cycle. Additionally, approximately how many customers are served by each of these facilities?
13. Please confirm that DEF would continue to use the underground facilities currently providing service to SECO customers who would be subject to transfer, pending Commission approval. Could this require an additional transfer of overhead facilities?

Triplett & Self

Page 3

April 21, 2020

Please file all responses electronically no later than May 5, 2020, 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 champson@psc.state.fl.us or at 850.413.6676 if you have any questions.

Sincerely,

/s/Corey Hampson

Corey Hampson

Public Utility Analyst

cc: Office of the Commission Clerk