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DIVISION OF ECONOMICS  
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# Public Service Commission

April 15, 2022

Palmer C. Davis  
City Attorney  
City of Lakeland  
228 South Massachusetts Avenue  
Lakeland, FL 33801  
Palmer.Davis@lakelandgov.net

## STAFF'S FIRST DATA REQUEST VIA EMAIL

Sean R. Parker  
City Attorney  
Boswell & Dunlap LLP  
245 South Central Avenue  
Bartow, FL 33830  
srp@bosdun.com

**Re: Docket No. 20220075-EU: Joint petition for approval of modification to territorial agreement in Polk County, by City of Lakeland and City of Bartow.**

Dear Mr. Davis and Mr. Parker:

By this letter, Commission staff respectfully requests that City of Lakeland, on behalf of Lakeland Electric (Lakeland) and City of Bartow (Bartow), the joint petitioners, provide responses to the following questions.

1. Please refer to paragraph 6 of the petition for the following questions:
  - a) With regards to the statement, "to accommodate new subdivision development...", please state the projected number of new subdivisions in Lakeland's service area and in Bartow's service area.
  - b) Please state the number of projected electric customers within Lakeland's and Bartow's service areas in these proposed new developments.
2. With reference to the statement "because of the planning and construction of new facilities by the parties..." in paragraph 9 of the petition, please explain if the new facilities are to serve the new customers in the new developments or a combination of existing and future customers.

P. Davis and S. Parker

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3. Referring to Exhibit B – New Agreement, please explain the purpose(s) of paragraphs 3.2 and 3.3 in Article 3.
4. Please provide a single map which clearly shows Lakeland's and Bartow's service territory boundary pursuant to the Legacy Agreement and the proposed service territory boundary in the revised Agreement. Also, please identify on the map, the general locations of the proposed developments referenced in paragraph 6 of the petition.

Please file all responses electronically no later than April 29, 2022 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 [sguffey@psc.state.fl.us](mailto: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 III

cc: Office of Commission Clerk