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RECEIVED-FPSC

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COMMISSION
CLERK

KATRINA M. THOMAS
KEVIN M. STONE

LEWIS W. STONE
SCOTT A. GERKEN

October 27, 2011

Via Federal Express

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 110272-EU, Joint petition for approval of a territorial
agreement in Lake County between City of Leesburg and Sumter
Electric Cooperative, Inc.

Dear Ms. Cole:

Pursuant to your letter dated October 14, 2011, enclosed please find an
original and three copies of Co-Petitioners' Joint Response to Staff's First
Data Request.

Thank you for your assistance in this matter.

Very truly yours,


Lewis W. Stone

LWS:ck

Enclosures

xc: Mr. Ben Brickhouse w/o encls.
Fred A. Morrison, Esquire w/o encls.

COM _____
APA _____
ECR 1
GCL 2
RAD _____
SRC _____
ADM _____
OPC _____
CLK _____

DOCUMENT NUMBER-DATE

07968 OCT 28 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Joint Petition for approval)
of territorial agreement between) Docket No. 110272-EU
City of Leesburg and Sumter Electric)
Cooperative, Inc.)
)
) DATE: October 14, 2011
)
_____)

CO-PETITIONERS' JOINT RESPONSE TO
STAFF'S FIRST DATA REQUEST

This is a joint response of Co-Petitioners, City of Leesburg ("Leesburg") and Sumter Electric Cooperative, Inc. ("SECO") to Staff's First Data Request.

1. Attached please find maps showing:

- a) The proposed boundary area between the parties as described in the territory description of the proposed Territorial Agreement;
- b) The boundary approved in the existing Order No. 25079 to Docket No. 910624-EU;
- c) Areas of service provided by Progress Energy Florida, Inc. ("PEF").*

*Both the City of Leesburg (Docket No. 820492-EU) and Sumter Electric Cooperative, Inc. (Order No. PSC 09 0276 PAA EU to Docket No. 080632-EU) have Commission approved agreements with PEF. The boundary lines in those agreements were separately negotiated with PEF, so they are not identical.

2. The boundary between the parties to the Proposed Territorial Agreement does not coincide with the city limits of Leesburg. The proposed boundary provides Leesburg territory outside its municipal boundaries and SECO territory within Leesburg's municipal boundaries.

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FPSC-COMMISSION CLERK

3. SECO has previously served areas within Leesburg's municipal boundaries and will continue to do so as a result of the proposed Territorial Agreement.

4. Prior to Staff's First Data Request, PEF was not notified (other than constructive notice by filing) of this Proposed Territorial Agreement. Subsequently, PEF has been notified by City of Leesburg and by SECO and PEF has expressed no objection.

5. The Proposed Territorial Agreement is not intended to alter and does not alter the existing Territorial Agreement between PEF and Leesburg (or the existing Territorial Agreement between PEF and SECO).

6. The two (2) customers to be transferred from SECO to Leesburg are not located within the city limits of Leesburg.

7. The discrepancy between eighteen (18) months to transfer the two affected customers stated in the Petition and thirty six (36) months to transfer customers stated in the Customer Notice occurred as follows:

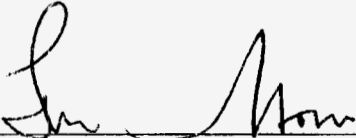
At the time the Notice was sent to the customers, the Petitioners wanted to allow maximum time to make the transfer. By the time the Petition was filed, it was clear to Petitioners that the transfer could be completed within eighteen months. While it would have been better for consistency to have retained the 36 month timeframe in the Petition, Petitioner will have the transfer made within 18 months (which is within the 36 months stated in the notification).

8. The two affected customers, based on payment history and longevity of service, have no deposits with SECO. Leesburg will not require a deposit to transfer. Leesburg reserves the right to require a deposit for future customers at the transfer locations and for security in the event of a negative change in payment practice.

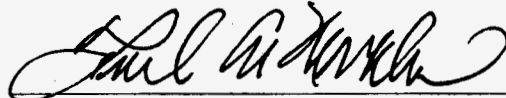
We trust this fully complies with and answers Staff's First Data Request. Should you have any additional questions, please let us know. If you desire a conference call, please call either office and we will facilitate the call.

I HEREBY CERTIFY that a true and correct copy of the foregoing Co-Petitioners' Joint Response to Staff's First Data Request was served by Federal Express (Priority Overnight - Tracking #797672151424), on this 27th day of October, 2011, to:

Ms. Ann Cole, Commission Clerk
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



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Facsimile: (352) 357-2474
(Attorney for Sumter Electric
Cooperative, Inc.)



Fred A. Morrison
Florida Bar Number 0284823
McLin Burnsed
1000 West Main Street
Leesburg, FL 34748
Telephone: (352) 728-1241
Facsimile: (352) 326-2608
(Attorney for City of Leesburg)

EXHIBIT A

to
Territorial Agreement
between Florida Power Corporation
and
the City of Leesburg

Sheet 1 -- Composite Territorial Map
Sheets 2 - 8 --- Detailed Territorial Maps

NOTE: In the event of any conflict or inconsistency
between the Composite Territorial Map and the
Detailed Territorial Map, the latter shall
control.

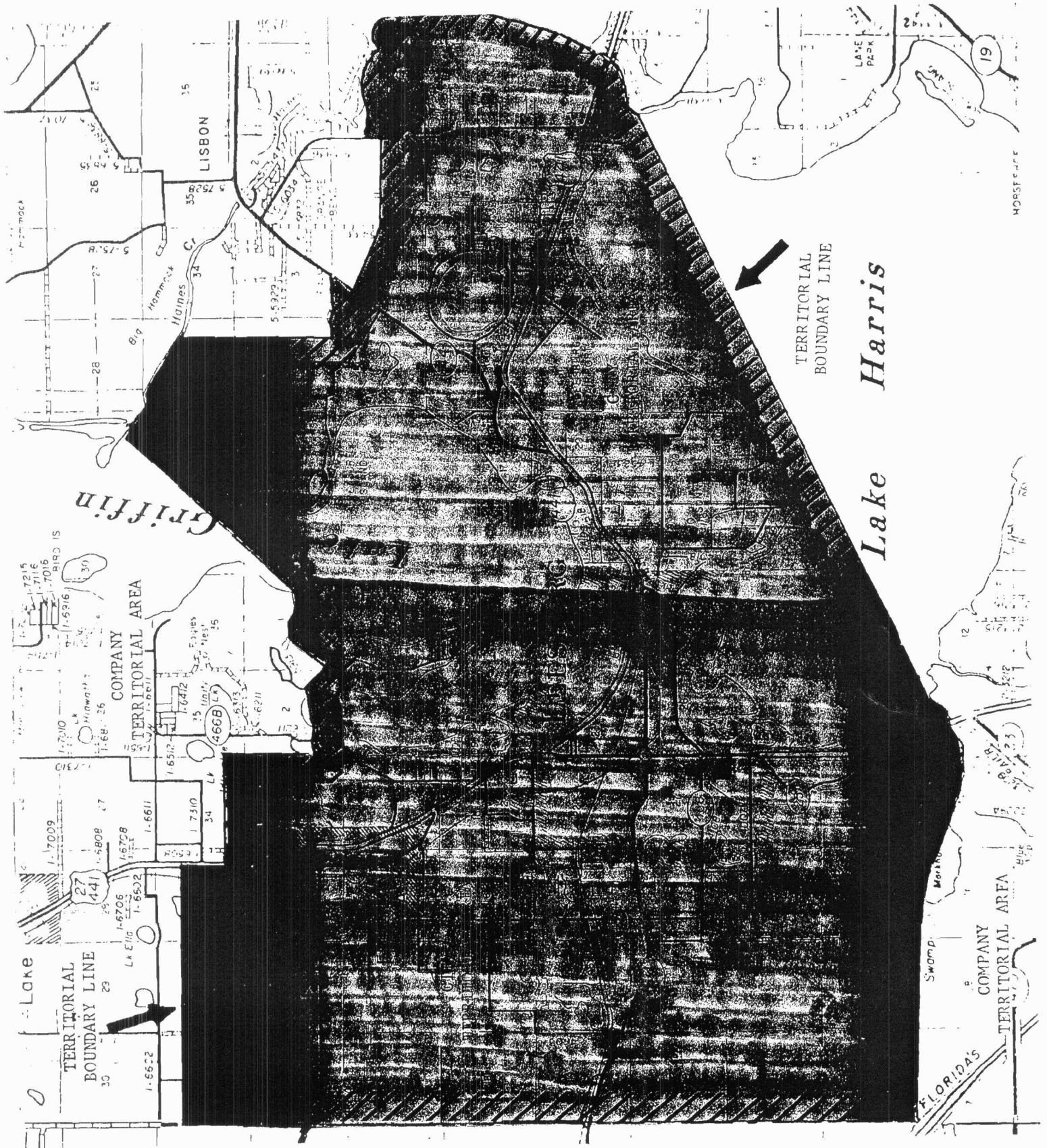


EXHIBIT A
to
Territorial Agreement
between Florida Power Corporation
and
the City of Leesburg

TWP. 20-RNG. 25

SCALE OF MILES
0 1/2 1.0

TWP. 19-RNG. 25

TWP. 19-RNG. 25

TWP. 20-RNG. 24

TWP. 20-RNG. 26

TERRITORIAL
BOUNDARY LINE

LAKE

HARRIS

LONG ISLAND

COMPANY
TERRITORIAL AREA

HOWEY-IN-THE-HILLS

LITTLE
LAKE
HARRIS

SEE PAGE NO 37

SEE PAGE NO 39

TWP. 20-RNG. 24

TWP. 20-RNG. 26

TWP. 21-RNG. 25

SEE PAGE NO 41

TWP. 21-RNG. 25

EXHIBIT A

Sheet 8 of 8

to
Territorial Agreement
between Florida Power Corporation
and
the City of Leesburg

A horizontal scale bar with the text "SCALE OF MILES" centered below it. The bar has three markings: "0" at the left end, "1/2" at the midpoint, and "1" at the right end.

TWP. 20-RNG. 25

TWP. 21-RNG. 24

to
Territorial Agreement
between Florida Power Corporation
and
the City of Leesburg

TWP. 19-RNG. 26

0 1/2 1.0
SCALE OF MILES

SEE PAGE NO. 25



EXHIBIT A

Sheet 6 of 8

to
Territorial Agreement
between Florida Power Corporation
and
the City of Leesburg

HAINES
CREEK
SEPT.

8/17/83
UPDATED
LIST
SEPT 7
CHANGED ACTIVE SERVICE
FILE CARD

TWP. 19 - RNG. 25

SCALE OF MILES 0 1/2 1.0

TWP. 18 - RNG. 25

TWP. 18 - RNG. 25

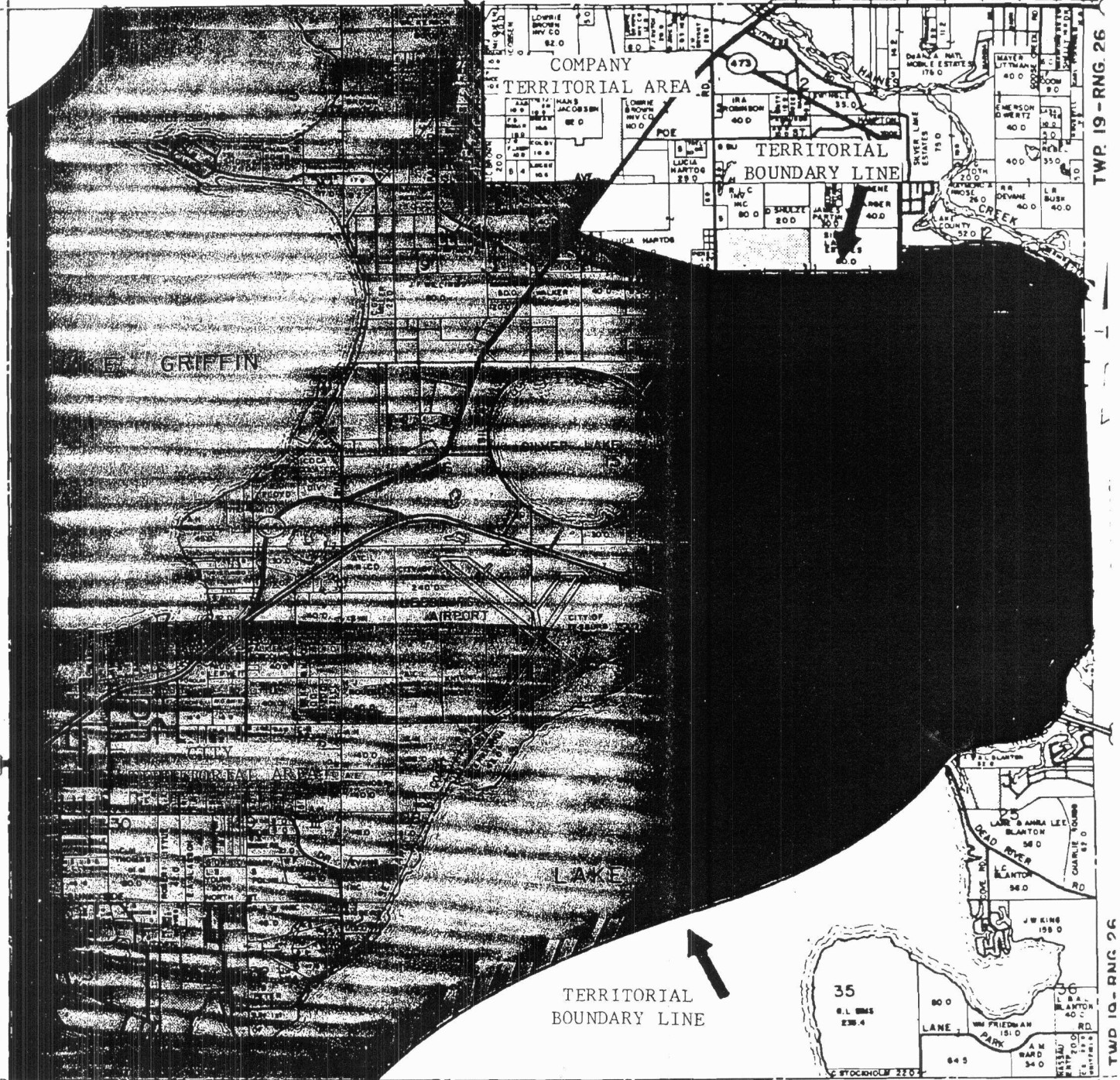
TWP. 19 - RNG. 24

SEE PAGE NO 29

TWP. 19 - RNG. 24

TWP. 19 - RNG. 26

TWP. 19 - RNG. 26



TWP. 20 - RNG. 25

SEE PAGE NO 38

TWP. 20 - RNG. 25

EXHIBIT A

Sheet 5 of 8

to
Territorial Agreement
between Florida Power Corporation
and
the City of Leesburg

TWP. 19 - RNG. 24

0 1/2 10
SCALE OF MILES

TERRITORIAL
BOUNDARY LINE

TWP. 18 - RNG. 24

SEE PAGE NO 23

COMPANY
TERRITORIAL AREA

TWP. 19 - RNG. 25

SEE PAGE NO 30

TWP. 19 - RNG. 25

TWP. 20 - RNG. 24

SEE PAGE NO 37

TWP. 20 - RNG. 24

EXHIBIT A

Sheet 4 of 8

to
Territorial Agreement
between Florida Power Corporation
and
the City of Leesburg

COUNTY

SEE PAGE NO

SUMTER

A horizontal scale bar with a vertical line at the left end labeled '0'. A tick mark in the middle is labeled '1/2', and a vertical line at the right end is labeled '1'. Below the bar, the words 'SCALE OF MILES' are written in capital letters.



Sheet 2 of 8

to
Territorial Agreement
between Florida Power Corporation
and
the City of Leesburg

TWP. 18-RNG. 25

SEE PAGE NO.

0 1/2 1.0
SCALE OF MILES

MARION

COUNTY

TWP. 18-RNG. 24

TWP. 18-RNG. 26

SEE PAGE NO 23

SEE PAGE NO 25

TWP. 18-RNG. 24

TWP. 18-RNG. 26

TWP. 19-RNG. 25

SEE PAGE NO 30

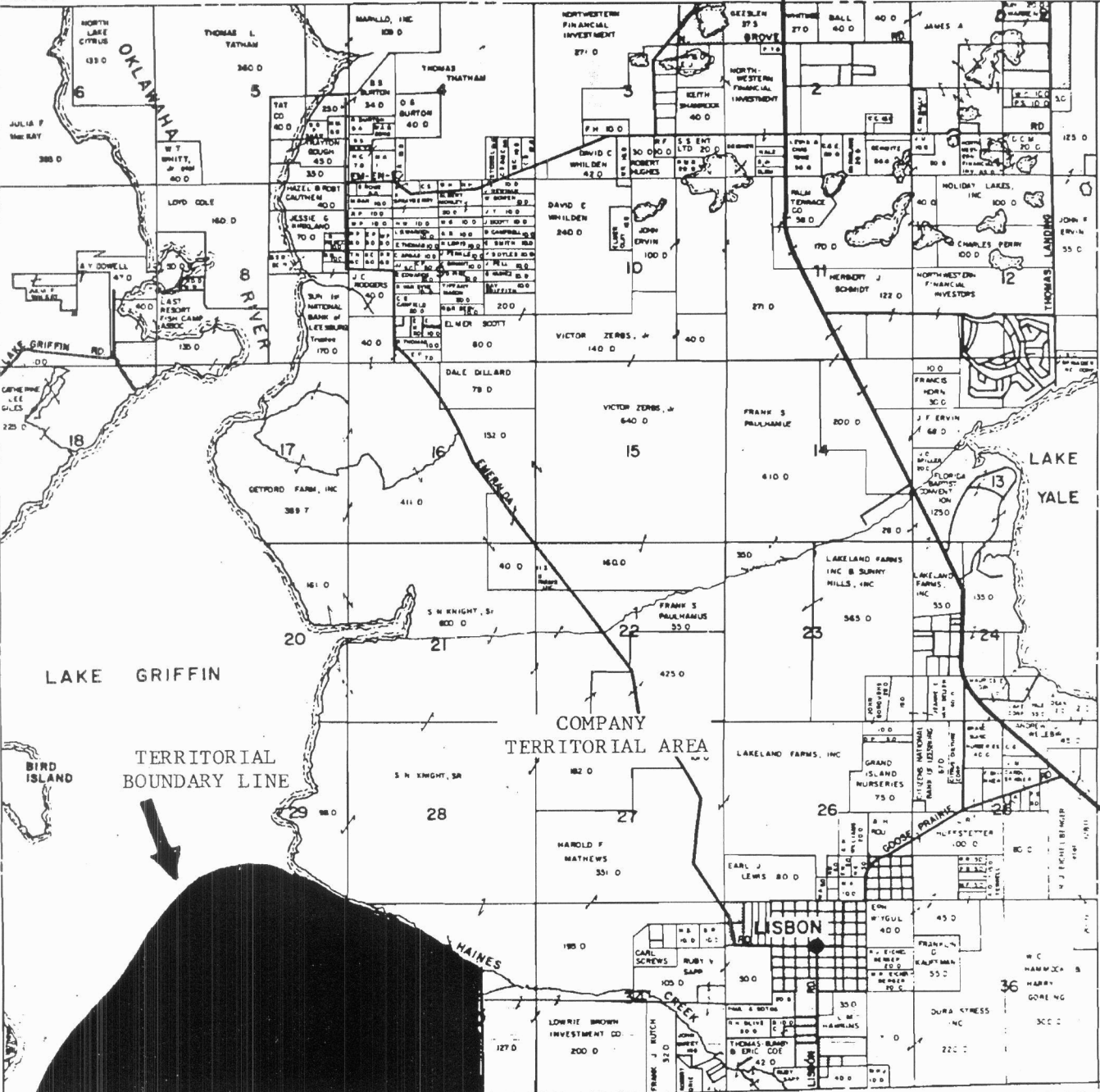
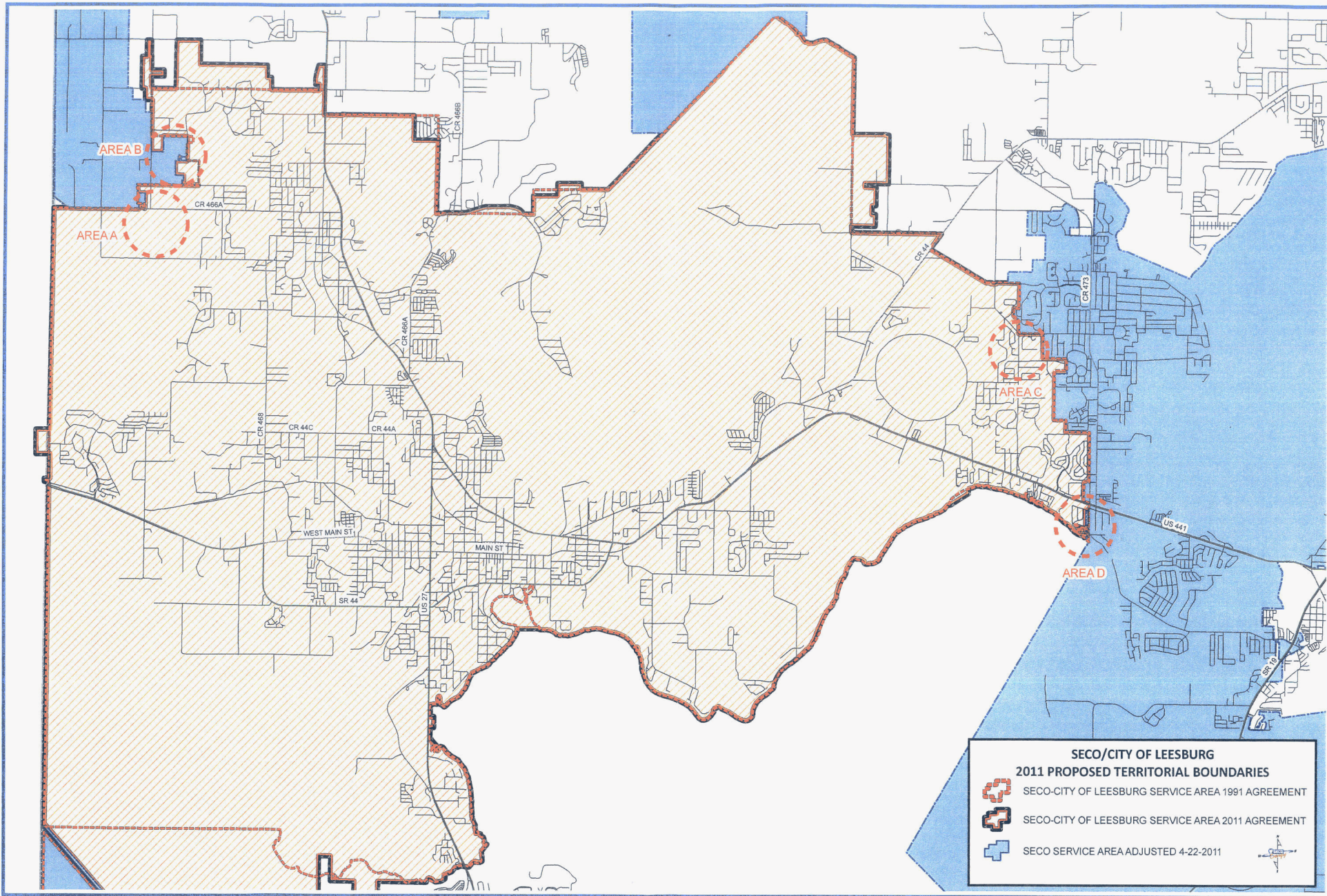
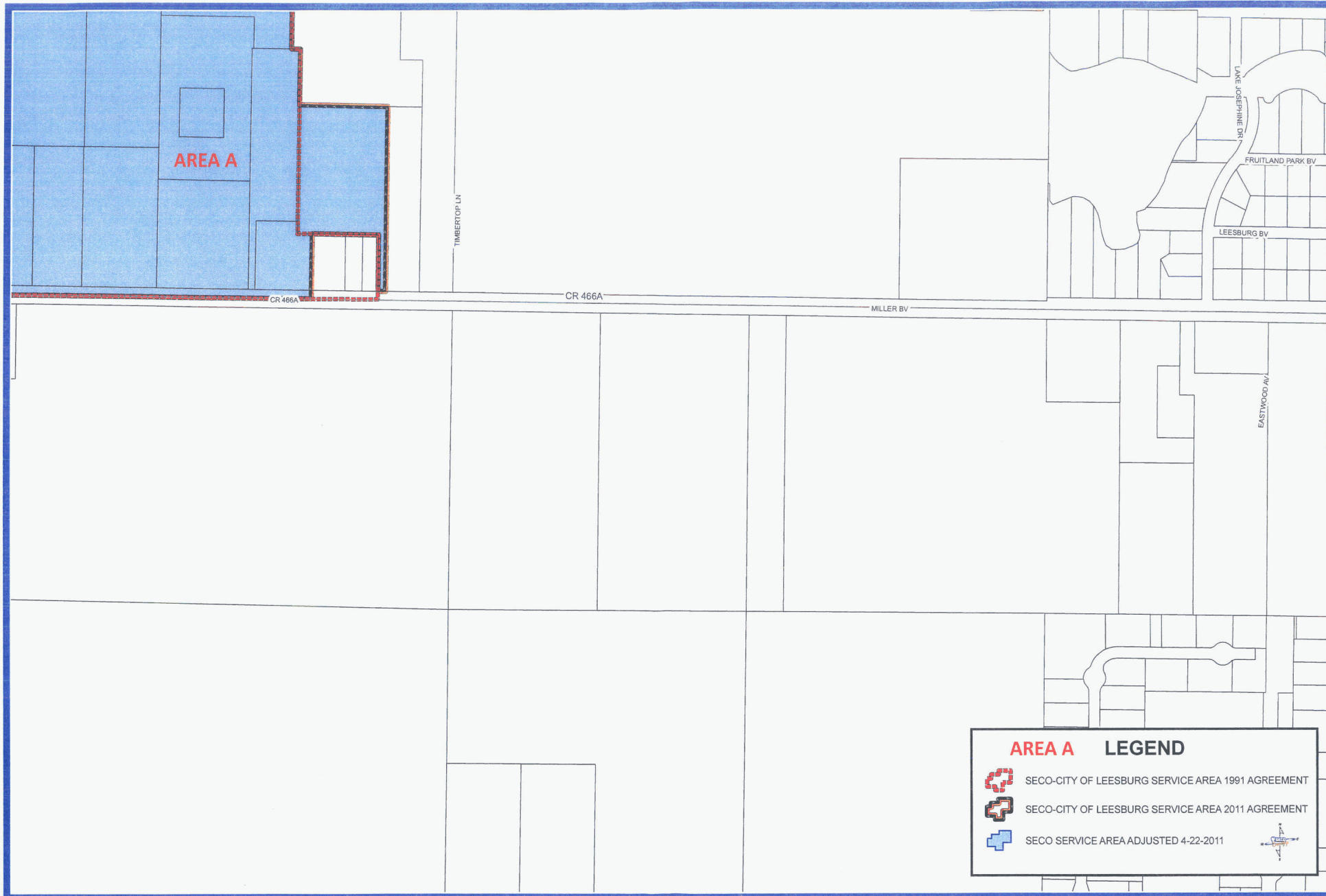


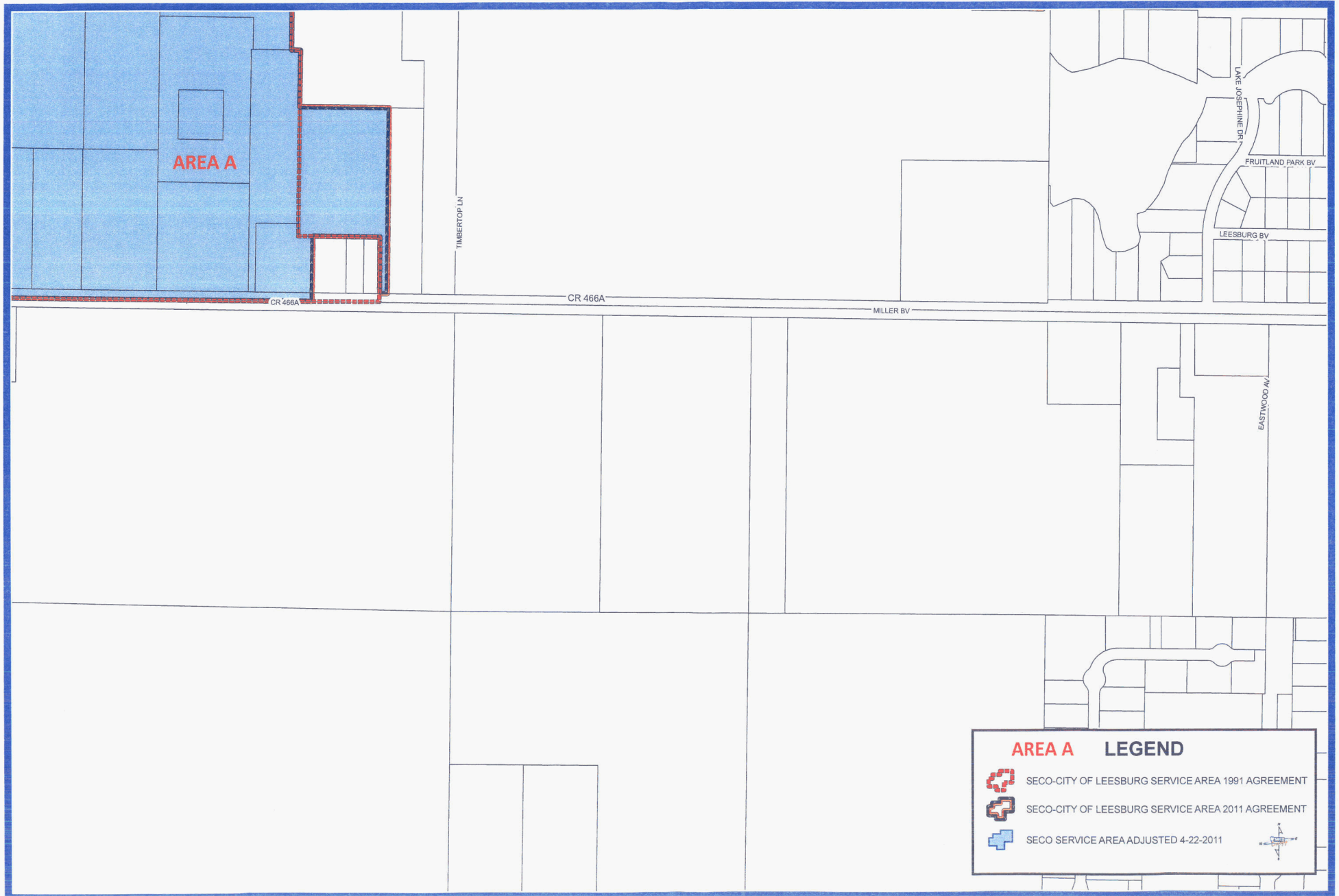
EXHIBIT A

Sheet 3 of 8

to
Territorial Agreement
between Florida Power Corporation
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AREA A LEGEND

-  SECO-CITY OF LEESBURG SERVICE AREA 1991 AGREEMENT
-  SECO-CITY OF LEESBURG SERVICE AREA 2011 AGREEMENT
-  SECO SERVICE AREA ADJUSTED 4-22-2011



