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STATE OF FLORIDA



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# Public Service Commission

August 29, 2023

John H. Haswell, Esquire  
Chandler, Lang, Haswell & Cole, P.A.  
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## STAFF'S SECOND DATA REQUEST VIA E-MAIL

Nick Batty, Esquire  
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**Re: Docket No. 20230087-GU: Joint petition for renewal of territorial agreement and approval of a first amendment, in Monroe County, by Florida Keys Electric Cooperative Association, Inc. and Utility Board of the City of Key West.**

Dear Mr. Haswell and Mr. Batty:

By this letter, Commission staff respectfully requests that joint petitioners Florida Keys Electric Cooperative Association, Inc. (FKEC) and Utility Board of the City of Key West d/b/a Keys Energy Services (KEYS) provide joint responses to the following questions. If either party desires to provide an independent response to one or more of these questions, please clearly indicate the party and the portion of the response it is independently providing.

1. If there are any extra territorial electric facilities owned by the Foundation and by FKEC, please discuss which entity will address any potential issues, service, or repairs on those extra territorial facilities.
2. Response 5 states "FKEC completed the construction on May 26, 2021" and Response 6 states that "FKEC is currently providing an underground single-phase (240/120v) service to Pigeon Key Foundation." Please state as to when FKEC started providing electric service to Pigeon Key Foundation.

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3. Response 7 states that FKEC plans to recover its cost to extend service to Pigeon Key through its electric service charges. Please explain if FKEC will be recovering the cost from its general body of ratepayers or from the Foundation or by another mechanism.
4. What is the average monthly electric bill cost of the Foundation pursuant to FKEC's General Service Demand (GSD) rate schedule?
5. Response 13 states that "there is no agreement between the Foundation and FKEC for the Foundation's facilities to be transferred to FKEC." Please explain whether FKEC has any intent to form such agreement in the future.
6. Please provide a clear, legible Exhibit 1 to the First Amendment to the Territorial Agreement.

Please file all responses electronically no later than September 7, 2023 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 IV

cc: Office of Commission Clerk