



Matthew R. Bernier
Senior Counsel
Duke Energy Florida, Inc.

December 18, 2015

VIA ELECTRONIC FILING

Ms. Carlotta Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Joint petition for approval of territorial agreement in Alachua, Marion, Columbia, Levy and Volusia Counties by Clay Cooperative, Inc. and Duke Energy Florida, LLC; Docket No. 150252-EU*

Dear Ms. Stauffer:

Please find enclosed for filing on behalf of Duke Energy Florida, LLC ("DEF") and Clay Cooperative, Inc. ("Clay"), DEF and Clay's Joint Response to Staff's First Data Request (Nos. 1-3).

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Respectfully,

s/Matthew R. Bernier
Matthew R. Bernier
Senior Counsel
Matthew.Bernier@duke-energy.com

MRB/mw
Enclosures
cc: Certificate of Service

Duke Energy Florida, Inc.
Docket No.: 150252
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail this 18th day of December, 2015 to all parties of record as indicated below.

s/Matthew R. Bernier
Attorney

John Villafrate
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
jvillafrate@psc.state.fl.us

John H. Haswell
Chandler Law Firm
P.O. Box 5877
Gainesville, FL 32627-5877
clhpalaw@aol.com

Mr. Richard K. Davis
Clay Electric Cooperative, Inc.
General Manager/CEO
P. O. Box 308
Keystone Heights, FL 32656-0308
service@clayelectric.com

Don Rome
Public Utility Analyst
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
drome@psc.state.fl.us

**DUKE ENERGY FLORIDA, LLC AND CLAY ELECTRIC COOPERATIVE, INC.'S
JOINT RESPONSE TO STAFF'S FIRST DATA REQUEST (NOS. 1 - 3)
Docket No. 150252-EU**

1. Please refer to Paragraph 6 of the petition (page 3 of 277), Exhibit C to the petition (page 219 of 277) and to Exhibit E to the petition (page 277 of 277). Paragraph 6 of the petition states that 441 customers (52 commercial and 389 residential) would be transferred from Clay to Duke, whereas Exhibit E states that approximately 361 Clay accounts would be transferred to Duke. Paragraph 6 of the petition states that 84 customers (16 commercial and 68 residential) would be transferred from Duke to Clay, whereas Exhibit C lists 83 Duke customers that would be transferred to Clay. Please clarify the numbers of commercial and residential customers that would be transferred between utilities under the proposed agreement.

RESPONSE:

Exhibits B and C provide the correct number of customers to be transferred between the Parties. The correct number of customers to be transferred from Clay Electric to Duke Energy is 432 customers (52 commercial and 380 residential), including 20 inactive customers, as shown on Exhibit B. The correct number of customers to be transferred from Duke Energy to Clay Electric is 83 customers (16 commercial and 67 residential), including 6 inactive customers, as shown on Exhibit C.

2. Please refer to Exhibit E to the petition (pages 276 and 277).
 - a. The Duke sample customer notification letter included as page 276 provides rate comparisons for commercial and residential customers. Are all of the commercial customers that would be transferred from Duke to Clay general service non-demand customers? If not, please provide sample letters for each applicable demand rate class.

RESPONSE:

Yes, all of the commercial Duke Energy customers to be transferred to Clay Electric are general service non-demand customers.

- b. The Clay sample customer notification letter included as page 277 provides rate comparisons for residential customers. Please provide a sample letter showing rate

comparisons for the commercial non-demand and/or demand customers that would be transferred from Clay to Duke.

RESPONSE:

A sample copy of a customer notification letter for a commercial non-demand customer for Clay Electric is attached. No commercial demand customers are being transferred to Duke Energy as a result of the Agreement.

3. Is it the intent of Duke and Clay to exchange and/or purchase any facilities pursuant to Section 3.5 (Compensation for Transferred Facilities) of the proposed agreement? If so, please provide an estimate of the purchase price.

RESPONSE:

As set forth in Section 3.3: Transfer of Related Service Facilities and in Section 3.5: Compensation for Transferred Facilities, the Parties may elect to purchase the electric facilities used exclusively for providing electric service to the transferred customers using a common engineering cost estimation methodology such as the Handy-Whitman index. The Parties have not yet decided whether to exchange and purchase the respective facilities but plan to make those decisions as soon as practical should the proposed Agreement be approved.