

STATE OF FLORIDA



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# Public Service Commission

November 8, 2018

Dianne M. Triplett  
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

D. Bruce May, Esquire  
(Attorney for PRECO)  
Holland & Knight  
315 south Calhoun Street, Suite 600  
Tallahassee, FL 32301  
bruce.may@hklaw.com

**Re: Docket No. 20180159-EU: Joint petition for approval of amendment to territorial agreement in Hardee, Highlands, Polk, and Osceola Counties, by Peace River Electric Cooperative and Duke Energy Florida, LLC.**

Dear Ms. Triplett and Mr. May:

By this letter, Commission staff respectfully requests the following information from Duke Energy Florida, LLC (DEF) and Peace River Electric Cooperative (PRECO).

1. Please state the reason(s) for this proposed amendment of the territorial agreement.
2. Please explain why customers need to be transferred from DEF and PRECO.
3. Please explain why customers need to be transferred from PRECO to DEF.
4. Please list any differences between the current and the proposed territorial agreement.
5. Paragraph 5 of the petition states that customer transfers will be completed within 36 months of the effective date of the agreement. Please explain the steps of customer transfers and the reasons for the 36-month transfer time frame.

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6. Paragraph 6 states that six industrial customers are to be transferred from DEF to PRECO. Please state what type of industries these six customers represent.
7. Paragraph 6 of the petition states that 2,858 customers are being transferred from DEF to PRECO. Does PRECO currently have the capacity and ability to reliably serve the additional customers without a negatively impacting the existing customer base?
8. Would DEF be compensated by PRECO for the 2,858 customers being transferred to PRECO?
9. Will any facilities be transferred from DEF to PRECO or from PRECO to DEF? If yes, please explain which facilities and show the derivation of the purchase price.
10. Exhibit D lists two commercial customers to be transferred from PRECO to DEF. Please state types of commercial customers being transferred.
11. Please provide a large scale map showing the current DEF and PRECO service territory and indicate on the map the areas being transferred (map can be simplified or hand drawn to indicate the changes).
12. Please provide a copy of an official Florida Department of Transportation General Highway County map for each affected county depicting boundary lines established by the proposed territorial agreement, as required by Rule 25-6.0440, Florida Administrative Code

Please file all responses no later than November 22, 2018 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 850.413.6204 or at [sguffey@psc.state.fl.us](mailto:sguffey@psc.state.fl.us) if you have any questions.

Thank you,

*/s/Sevini Guffey*

Sevini Guffey

Public Utility Analyst II

cc: Office of Commission Clerk  
Matthew Bernier, Esq., Duke Energy Florida, LLC