

STATE OF FLORIDA



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Public Service Commission

May 13, 2020

Floyd R. Self, B.C.S.
Berger Singerman LLP
313 North Monroe Street, Suite 301
Tallahassee, FL 32301
fself@bergersingerman.com

**Staff's First Data Request
VIA E-MAIL**

Thomas A. Cloud, B.C.S.
Gray Robinson, P.A.
301 East Pine Street, Suite 1400
Orlando, FL32801
thomas.cloud@gray-robinson.com

Re: Docket No. 20200138-EU: Joint petition for approval of territorial agreement in Sumter County, by Sumter Electric Cooperative, Inc. and City of Bushnell.

Dear Mr. Self and Mr. Cloud:

By this letter, Commission staff requests the following information from the Sumter Electric Cooperative, Inc. (SECO) and the City of Bushnell (City or Bushnell).

1. The 1999 Territorial Agreement approved by the Commission expired over 8 years ago in March 2012. Paragraph 4 of the petition attributes the delay in reaching a new agreement to arbitration and obligations under the former and new franchise agreements. Please provide a brief summary of the reasons for the arbitration, the major components of the 2017 Arbitration Award, and any events that may have contributed to the time lag between Territorial Agreements.
2. Paragraph 4 of the petition states that after multiple years of work, the parties completed the transfer of facilities and customers in the fall of 2019.
 - a. Did both SECO and Bushnell transfer facilities and customers to each other?
 - b. What was the cost to transfer facilities and customers and what methodology was used to calculate the value of the transferred facilities?
3. Would the above referenced transferred facilities exclusively serve the transferred customers? If not, please explain.

4. Paragraph 4 of the petition states that customer and facility transfers needed to be completed pursuant to the Original Franchise Agreement, prior to preparing a new territorial agreement. Please provide a copy of the Original Franchise Agreement to staff.
5. Paragraph 4 of the petition refers to a Transfer Agreement dated August 2, 2018 which allowed the parties to transfer customers and facilities and completed the transfer in fall of 2019. In the referenced Transfer Agreement, did the parties contemplate their plan for the transferred customers should the Commission not approve the proposed territorial agreement? Please discuss.
6. SECO letter (Exhibit C) indicates 620 SECO accounts will be transferred to Bushnell. The list of accounts to be transferred (Exhibit D) includes 681 accounts. Please explain the discrepancy.
7. Please state the number of customers to be transferred, by class, pursuant to 25-6.0440(1)(c), F.A.C.
8. SECO customer letter (Exhibit C, page 1 of 2) dated September 25, 2019 does not include information related to rates and charges the transferred customers would be paying as customers of Bushnell. City of Bushnell customer letter (Exhibit C, page 2 of 2) dated August 2019, indicates that the City has not finalized its rates. Please provide assurance that Bushnell will contact the new customers with rates and charges including customer deposits explained, pursuant to Rule 25-6.0440(1)(d), F.A.C. Please provide a copy of this customer letter to Commission staff.
9. Please provide a copy of the current SECO rates and the finalized Bushnell rates.
10. Please provide assurance that the agreement, in and of itself, will not cause a decrease in the reliability of electrical service to the existing or future ratepayers of SECO and Bushnell pursuant to Rule 25-6.0440(2)(b), F.A.C.

Please file all responses electronically no later than May 27, 2020, via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at sguffey@psc.state.fl.us or at 850.413.6204 if you have any questions.

Sincerely,

/s/Sevini Guffey

Sevini Guffey

Public Utility Analyst

cc: Office of the Commission Clerk