## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of Florida Keys Electric
Cooperative Association, Inc. and the Utility Board
of the City of Key West for Renewal of their
original Territorial Agreement, and Approval of
Amendment No. 1 in Monroe County, Florida

.

Docket No. 20230087-EU

Filed: August 7, 2023

## JOINT PETITIONERS' RESPONSE TO STAFF'S SECOND DATA REQUEST

Joint Petitioners, Florida Keys Electric Cooperative Association, Inc. ("FKEC") and the Utility Board of the City of Key West, Florida d/b/a Keys Energy Services ("KEYS"), do hereby respond to the Staff's Second Data Request as follows:

1. Staff: 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. "Extra territorial" means if FKEC has any electric facilities in KEYS's service area, or if KEYS has any facilities in FKEC's service area.

Response: There are no electric facilities that are owned by FKEC in KEYS's service territory, and there are no electric facilities that are owned by KEYS in FKEC's service territory. All service, issues, and repairs are the responsibilities of each utility in their own services areas.

2. Staff: 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.

Response: According to FKEC's business records, May 26, 2021 was the date that FKEC started providing service to Pigeon Key Foundation.

1

3. Staff: 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.

Response: FKEC did not request any cost payback from the Foundation. FKEC will "recover costs" by the ongoing monthly bill under FKEC's standard general service demand rate (as filed with the PSC) just like every other GSD member.

4. **Staff:** What is the average monthly electric bill cost of the Foundation pursuant to FKEC's General Service Demand (GSD) rate schedule?

Response: \$1,444.80 per month on average.

5. Staff: 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.

**Response:** FKEC does not have any plans for the Foundation to transfer their facilities to FKEC, nor is there any obligation of the Foundation to do so.

6. **Staff:** Please provide a clear, legible Exhibit 1 to the First Amendment to the Territorial Agreement.

Response: This was satisfied by delivery of a more legible diagram with the service area change in red.

Respectfully submitted this	day of	, 2023.

/s/ John H. Haswell

John H. Haswell, Esq.

Chandler, Lang, Haswell & Cole, P.A.

P.O. Box 5877

Gainesville, FL 32627-5877

Telephone: (352) 376-5226

r ii ii i o i

Email: clhpalaw@aol.com

For Florida Keys Electric Cooperative

Association, Inc.

/s/ Nick Batty

Nick Batty, Esq.

Keys Energy Services

1001 James Street

Key West, FL 33040

Telephone: (305) 295-1191

Email: nick.battv@KevsEnergy.com

For Keys Energy Services