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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

July 8, 2025

STAFF'S FIRST DATA REQUEST
Via E-Mail

Jody Lamar Finklea, B.C.S.
On behalf of Lakeland Electric
Florida Municipal Power Agency
2061-2 Delta Way
Tallahassee, Florida 32315-3209
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Malcolm N. Means, Esquire,
On behalf of Tampa Electric Company
Post Office Box 391
Tallahassee, Florida 32302-0391
mmeans@ausley.com

Re: Docket No. 20250089-EU - Joint Petition of Tampa Electric Company and the City of Lakeland, Florida, On behalf of its municipal utility, Lakeland Electric, for Approval of Amended and Restated Territorial Agreement

Dear Counsels:

By this letter, the Commission staff respectfully requests Tampa Electric Company (TECO) and the City of Lakeland (City, or Lakeland) provide responses to Staff's First Data Request regarding the above-referenced joint petition.

1. In paragraph 18.b (page 7) of the Joint Petition, the Joint Parties state that the Agreement "will not cause any decrease in the reliability of electrical service to any existing or future ratepayers of either Tampa Electric or Lakeland." Please provide any analysis or documents that support this assertion.
2. In paragraph 18.c (page 7) of the Joint Petition, the Joint Parties state that the Agreement "will eliminate potential uneconomic duplication of facilities," and cite cost comparisons from Order No. PSC-2025-0089-PAA-EU. Since the issuance of that Order on March 24, 2025, have the Joint Parties conducted any additional analysis or prepared any supporting materials—quantitative or qualitative—that further explain or document how the Agreement avoids uneconomic duplication? If so, please provide those materials.

3. On page 13 of Composite Exhibit A to the Joint Petition, Page 13, a section of the territory appears shaded in yellow. Please identify which utility currently serves this area and explain whether it is subject to any change in the amended territorial agreement.
4. Paragraph 18.c of the Joint Petition (page 7) references cost estimates considered by the Commission in Order No. PSC-2025-0089-PAA-EU. These include estimates submitted on January 9, 2025, in Docket No. 20240171-EU, indicating approximate costs of \$78,000 for Lakeland to serve the 39 lots in Schaller Preserve and \$105,000 for TECO to serve the same. Since those estimates were prepared, have construction costs changed by 10 percent or more for any of these service areas? If so, please provide updated cost estimates and identify the specific changes in labor, material, or other costs that contributed to the variance.
5. Paragraph 18.c of the Joint Petition (page 7) also references estimates submitted on January 9, 2025, in Docket No. 20240171-EU, indicating approximate costs of \$115,000 for TECO to serve Phase 2 of Cadence Crossing and \$118,000 for Lakeland to serve that phase. Since those estimates were prepared, have construction costs changed by 10 percent or more for any of these service areas? If so, please provide updated cost estimates and identify the specific changes in labor, material, or other costs that contributed to the variance.
6. On page 6 of the Joint Petition, the Joint Parties describe the boundary adjustments involving the Schaller Preserve and Phase 2 of Cadence Crossing subdivisions. Please provide the current status of construction within the areas affected by the amended territorial agreement. Specifically, for each affected development:
 - a. What percentage of construction/removal is complete, and what percentage remains to be constructed/removed for each utility?
 - b. What assets have been constructed/removed, and what assets remain to be constructed/removed for each utility?
 - c. What costs of construction/removal have been incurred to date, and what estimated costs remain for each utility?
 - d. What is the anticipated activation date for electric service (i.e., when each development is expected to be energized)?

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Staff's First Data Request

- e. Please provide a detailed timeline (past, present, future) of the development of the Schaller Preserve and Phase 2 Cadence Crossing electric facility distribution extensions that is the subject of the current Joint Petition and Order No. 20250089-EU.

Please file all responses electronically no later than July 18, 2025 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 bpope@psc.state.fl.us or at (850) 413-6568 or email Michael Barrett at mbarrett@psc.state.fl.us if you have any questions.

Thank you,

/s/Bria Pope

Bria Pope
Public Utility Analyst

cc: Michael Barrett, Economist Supervisor
Office of the Commission Clerk