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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

JULY 17, 2025

## STAFF'S FIRST DATA REQUEST

*Via Email*

Monica D. Barnes, Esquire  
On behalf of Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408  
[Monica.Barnes@fpl.com](mailto:Monica.Barnes@fpl.com)  
[Russel.baders@fpl.com](mailto:Russel.baders@fpl.com)

**Re: Docket No. 20250082-GU – Petition to Resolve Territorial Dispute with  
Florida Power & Light Company, by Gulf Coast Electric Cooperative, Inc.**

Dear Ms. Barnes:

By this letter, the Commission staff respectfully requests Florida Power & Light Company (FPL, or utility) provide responses to staff's first data request:

**Legal:**

1. Please refer to paragraph 26 of FPL's filing dated June 23, 2025 to answer the following:

A. Order No. PSC-01-0891A-PAA-EU, Amendatory Order, issued March 26, 2002, in Docket No. 930885-EU, states, in part, that Existing Facilities are defined as follows:

Existing Facilities. As used herein, the term "Existing Facilities" shall mean the Utility's nearest facilities that are of a sufficient size, character (number of phases, primary voltage level, etc.) and accessibility so as to be capable of serving the anticipated Load of a Customer without requiring any significant modification of such facilities.

What support does FPL have for its assertion in Paragraph 26 that "Existing Facilities include those that are planned or under construction."

2. Has FPL pursued mediation to resolve this matter? If not, does FPL plan to pursue mediation? If FPL does not plan to pursue mediation, why? Please explain your response.

**Liberty:**

3. Footnote 2 references a planned residential development named the Liberty residential subdivision.
  - A. On what date did the developer of the Liberty residential subdivision request service from FPL?
  - B. Will construction activities be required in order for FPL to serve the Liberty subdivision? If so, please describe the facilities that are planned for serving the Liberty subdivision, including whether such facilities are planned (or sized) in a manner to support future growth, or additional loads.
  - C. Are the facilities that are planned for serving the Liberty residential subdivision currently under construction now (as of the date FPL prepares this response)? Provide a schedule for past, current, future electric facility installations by FPL to serve this subdivision, identifying assets and installation dates.
4. Provide a detailed map that clearly shows the proposed and existing electric facilities, roadways, and Liberty residential subdivision, with symbols key that defines facilities and differentiates between in-ground and planned facilities.

**Parkbrook:**

5. Please refer to paragraph 10 of FPL's filing dated June 23, 2025, which states, in part, that Existing Facilities are 880 feet from the Point of Delivery to the Subdivision.
  - A. On May 28, 2024 (the date FPL asserts it received a request for service), please clarify whether the facilities at the Point of Delivery a) were in-place, operational, and energized facilities, or b) were planned facilities (not in-place, operational, or energized).
  - B. Has FPL entered into a written and/or oral agreement to provide service to Parkbrook residential subdivision? If so, please provide such written agreement or, if an oral agreement, please summarize the details which were agreed.
  - C. Does FPL believe it was legally obligated to provide service to Parkbrook residential subdivision based on the May 28, 2024 service request from Garden Street Communities SE? Please explain.
  - D. What is the approximate cost to construct the line extension 880 feet from the Point of Delivery to the Subdivision? Refer to Order No. PSC-01-0891A-PAA-EU, Amendatory Order, Attachment A, Section 1.1, Cost of Service. Based on this reference, please provide the cost analysis that FPL developed to serve the Customer in the instant case, and also specify the date such analysis was prepared.

- E. Are the facilities that are planned for serving the Parkbrook residential subdivision currently under construction now (as of the date FPL prepares this response)? Provide a schedule for past, current, future electric facility installations by FPL to serve this subdivision, identifying assets and installation dates.
6. As of June 3, 2025, please describe what electric distribution facilities, if any, FPL has placed in efforts to serve the Parkbrook residential subdivision. Describe whether such facilities are aerial or buried, or a mix of aerial and buried, the kilovolt rating, and whether such facilities are single-phase or three-phase. If applicable, state the degree to which construction activities have been completed (stated as linear feet of electric distribution line, or as a percentage between 0 and 100 percent), and the approximate dollar value of the facilities described above (materials and labor), as of June 3, 2025.
7. Provide a detailed map that clearly shows the proposed and existing electric facilities, roadways, and Parkbrook residential subdivision that FPL proposes to serve, with a symbols key that defines facilities and differentiates between in-ground and planned facilities. Identify on the map the location of the Point of Delivery referenced in Paragraph 10 of FPL's response to GCEC's petition.
8. Provide a map that shows the proposed and existing FPL and GCEC electric facilities for both the Parkbrook and Liberty residential subdivisions, including facilities that may be connect such developments, with symbols key that denotes facilities types and differentiates between in-ground and planned facilities (to the extent known for GCEC).

**Territorial Agreement:**

9. Please refer to paragraph 11 of FPL's filing dated June 23, 2025 to answer the following:
- A. FPL states, in part, that "In addition, it is important to note that territorial agreements are not required to be lines-on-the-ground boundaries." Paragraph 12 of GCEC's filing dated June 3, 2025, references that the agreement FPL inherited with GCEC when it merged with Gulf was "vastly different than FPL's other territorial agreements." Does FPL believe it is more economical to follow the current arrangement that features complex analytics with distance-to-load criteria rather than have lines-on-the-ground boundaries (at least partially) with GCEC? Please explain your response.
- B. How many active territorial agreements in Florida does FPL have that feature "lines on the ground boundaries"? How many active territorial agreements in Florida does FPL have that feature the complex analytics similar to the GCEC agreement?
- C. Aside from economic reasons discussed in response to sub-part 9.A. above, please identify any unique circumstances between GCEC and FPL that support or justify the use of the current arrangement, instead of an agreement with lines-on-the-ground boundaries?

10. Please identify on a map (or maps) all the locations in which GCEC and FPL have parallel electric distribution lines, or locations where their respective facilities or service drop wires cross one another, or otherwise create hazardous conditions. Please provide a separate response for the areas that FPL serves in Bay, Walton, Washington, and Jackson Counties.

**Communications:**

11. Identify each communication (including initiator of communication, date, individuals present or involved, subject matter, decisions or agreements, etc.) that occurred between FPL and Garden Street Communities SE on or prior to May 28, 2024.
12. Paragraph 37 of GCEC's filing dated June 3, 2025, references that one phone call and two meetings took place between GCEC and FPL on the specified dates. Please provide all available notes and/or written documents in FPL's possession that summarize the discussions from those events.
13. FPL asserts (in Paragraph 23 of its Response to GCEC's filing) that Garden Street Communities SE (Customer) contacted it on May 28, 2024 to request service. Please discuss what FPL believes prompted the Customer to contact FPL for service.
14. As of June 3, 2025, has FPL stopped all of its work efforts to serve this Customer, pending the outcome of the Commission's decision in this matter? Please discuss your response.

Please file all responses electronically no later than July 28, 2025 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. *In addition, please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us).*

Please contact Devan Prewett at (850) 413-6078 if you have any questions.

Sincerely,

*/s/Devan Prewett*  
Devan Prewett  
Public Utilities Analyst

cc: Office of the Commission Clerk  
Michael Barrett, Economist Supervisor  
Ryan Sandy, Lead Staff Counsel