



July 18, 2025

VIA ELECTRONIC FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

Dear Mr. Teitzman:

Attached please find Tampa Electric Company and the City of Lakeland, Florida's answers
to Staff's First Data Request (Nos. 1-6), propounded on July 8, 2025.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Malcolm N. Means'.

Malcolm N. Means

MNM/bml
Attachment

cc: Bria Pope, FPSC
Michael Barrett, FPSC
Jody Lamar Finklea
Ramona Sirianni
Cindy Clemmons
Scott Bishop
Paula Brown

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20250089-EU
STAFF'S FIRST DATA REQUEST
REQUEST NO. 1
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- 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.

- A.** Tampa Electric and Lakeland ("Joint Parties") do not have any analysis or documents to support this assertion. The new load associated with the two planned developments is small relative to the Joint Parties' total system load and total customers served. The system planning team at each utility has confirmed that the additional load can be served without creating any reliability concerns for existing or future ratepayers.

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- 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.
- A.** The Joint Parties did not conduct any additional analysis or prepare any supporting materials—quantitative or qualitative—that further explain or document how the Agreement avoids uneconomic duplication. Such an analysis is not necessary because Lakeland already has facilities near their respective proposed territorial addition and Tampa Electric already has facilities near their respective proposed territorial addition. The proposed swap is more cost-effective for Tampa Electric's and Lakeland's ratepayers.

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- 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.
- A.** The section shaded in yellow on page 13 of Composite Exhibit A to the Joint Petition was inadvertently omitted from the initial color-coding and has now been correctly identified as territory currently served by Tampa Electric. This area is not subject to any change in the amended territorial agreement; its shading was solely due to an initial oversight in the exhibit's preparation. We will submit a supplement to the Joint Petition to correct the affected maps accordingly.

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- 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.
- A.** Tampa Electric's and Lakeland's cost estimates have not changed since the estimates submitted on January 9, 2025.

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- 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.
- A.** Tampa Electric's and Lakeland's cost estimates have not changed since the estimates submitted on January 9, 2025.

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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)?
 - 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.

A. The following answers apply to Cadence Crossing:

- a. Forty percent of the newly installed facilities are complete, while the 60 percent have not been installed. This project does not involve the removal of any Tampa Electric facilities.
- b. Tampa Electric has constructed two poles and associated overhead materials, as well as the entire underground conduit system. The remaining work includes installation of underground primary cable, secondary and service cable, transformers, and the UG lighting system.
- c. For Phase 2, Tampa Electric has incurred approximately \$63,000 in construction costs to date. The company estimates that the remaining construction costs are approximately \$52,000 and that the total project costs will be approximately \$115,000.
- d. Tampa Electric estimates that service will be energized for Cadence Crossing in late 2025.
- e. The timeline for Tampa Electric's extension of service to Phase 2 of Cadence Crossing is as follows:

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- Tampa Electric completed 24 hours of internal design work and approvals by February 19, 2025. This involved 24 hours of internal work.
- Tampa Electric completed overhead work and installation of 2 poles on May 23, 2025. This involved 45 hours of crew work.
- Tampa Electric completed installation of underground conduit on July 8, 2025. This stage involved 989 hours of crew work.
- The company plans to begin work on installation of all primary, secondary, and service cables, transformers, and the lightning system beginning in early August. Tampa Electric expects this work will be completed in late September or early November depending on crew availability and weather conditions. The company estimates that this will involve a total of 418 hours of crew work.

The following answers apply to Schaller Preserve:

- a. For reasons beyond Lakeland Electric's control, the Developer of Schaller Preserve has chosen to delay the construction of their subdivision.
- b. No assets have been constructed/removed to date. Therefore, all assets remain to be constructed/removed.
- c. \$0 cost incurred / \$118,000 remaining cost
- d. February 2027.
- e. Pending construction schedule, potentially late 2026 or early 2027, depending on development timeline.