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DIVISION OF ECONOMICS
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Public Service Commission

March 20, 2026

Stephanie A. Cuello
Duke Energy Florida, LLC
106 E. College Ave., Ste. 800
Tallahassee, FL 32301
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STAFF'S SECOND DATA REQUEST
via email

Malcolm N. Means
Post Office Box 391
Tallahassee, FL 32302-0391
mmeans@ausley.com

Re: Docket No. 20260013-EU - Joint Petition for Approval of Territorial Agreement in Hillsborough, Pasco, Pinellas, and Polk Counties by Tampa Electric Company and Duke Energy Florida, LLC

Dear Counsels:

By this letter, the Commission staff respectfully requests Tampa Electric Company (TECO) and Duke Energy Florida, LLC (DEF) (collectively Joint Petitioners or Utilities), provide responses to Staff's Second Data Request regarding the above-referenced joint petition.

1. Please refer to Exhibit A, Attachment 2, map page 23, from the Joint Petitioner's response to Staff's First Data Request, dated February 16, 2026. This map page appears to show the proposed change of two parcels from TECO's service territory to DEF's service territory. Please explain the Utilities' reasoning for proposing the change of the boundary lines instead of customer transfers.
2. Refer to Exhibit A, Attachment 10, map page 52, from the Joint Petitioner's response to Staff's First Data Request, dated February 16, 2026. This map page appears to show the proposed change of a parcel from DEF's service territory to TECO's service territory. Please explain the Utilities' reasoning for proposing the change of the boundary lines instead of customer transfers.

3. Please refer to Exhibit A (maps). Please answer the following:
 - A. Several of the maps provided in the petition in Exhibit A appear to indicate that a number of customers are served as specified by the cross-hatched areas of the maps, indicating that they are not being served by the utility consistent with their current bounded service area, but are instead served by the other utility. Please identify the total number of such Extra-territorial Customers at the current time for each such map. Provide a separate response for each utility and a total number of Extra-territorial Customer connections for each utility.
 - B. For each such entry in response to Question 3.A., please explain the reason(s) why the connection of Extra-territorial Customers occurred and, if known, the general time period when such connections took place.
 - C. If the Utilities have changed operational procedures and/or technologies used to prevent or reduce the number of out-of-territory connections in the years since the current territorial agreement became effective, please specify (for each utility):
 1. What those procedures/technologies are,
 2. When such procedures/technologies were implemented,
 3. How the utility measures and/or audits the effectiveness of such procedures/technologies in reducing out-of-territory connections,
 4. Identify the period or cycle of out-of-territory connection audits,
 5. Summarize the effectiveness of such measures/technologies since implementation per such audits in reducing out-of-territory connections, and
 6. Please explain whether any additional procedures/technologies are currently planned to reduce out-of-territory connections in the future.
4. Please explain whether the boundary line changes are proposed, in part, to reduce the number of Extra-territorial Customers identified in Question 3.A., in addition to the reasons identified in response to Staff's First Data Request, Question 4.C.
5. Would the proposed territorial boundary lines, if approved, eliminate nearly all of the Extra-territorial Customers identified in Question 3.A.? If not, please explain.

Please file all responses electronically no later than April 3, 2026, through the Commission's website at 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.*

Please contact me at dprewett@psc.state.fl.us or at (850) 413-6078 if you have any questions.

Sincerely,

/s/ Devan Prewett

Devan Prewett

Public Utility Analyst II

cc: Office of the Commission Clerk (for docket file)
discovery-gcl@psc.state.fl.us