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April 2, 2026

VIA ELECTRONIC FILING

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

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

Dear Mr. Teitzman:

On behalf of Duke Energy Florida, LLC (“DEF”) and Tampa Electric Company (“TECO”), please find enclosed for electronic filing in the above-referenced docket, DEF and TECO’s Response to Staff’s Second Data Request (Nos. 1-5).

Thank you for your assistance in this matter. If you have any questions concerning this filing, please feel free to contact me at (850) 521-1428.

Sincerely,

/s/ Stephanie A. Cuello

Stephanie A. Cuello

SAC/clg
Enclosures

cc: Devan Prewett
Malcolm N. Means

Duke Energy Florida, LLC's ("DEF") Response to Florida Public Service Commission's ("FPSC") Second Data Request (Nos. 1-5) re: Joint Petition for Approval of Territorial Agreement in Hillsborough, Pasco, Pinellas, and Polk Counties by Tampa Electric Company and Duke Energy Florida, LLC

Docket No. 20260013-EU

1. Please refer to Exhibit A, Attachment 2, map page 23, from the Joint Petitioner's response to Staffs 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.

Response:

A. Non-typical equipment needed to serve this location. Duke Energy has multiple large pad mounted transformers at this location, which TECO does not keep in inventory and use on their system. This would require TECO to purchase and stock a replacement for each non-typical transformer in case of an equipment failure in the future.

B. The eastern most parcel on map page 23 is Duke Energy's Oldsmar Substation. This location is used to power the Lockheed Martin parcel to the west, also on map page 23. If TECO was to serve the Lockheed Martin parcel, they would need to purchase Duke Energy's substation to adequately serve the customer.

C. Transferring from one utility to the next would require lengthy outage.

2. Refer to Exhibit A, Attachment 10, map page 52, from the Joint Petitioner's response to Staffs 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.

Response:

This is The Gates of Lake Region subdivision currently being served by TECO in Duke Energy territory. Duke Energy is redrawing this territory to TECO. With the difference in primary voltage, Duke Energy would need to replace all pad mount transformers inside the subdivision. This would result in prolonged outages to the subdivision residents, potential damage to customer property resulted in needed site restoration, and costly infrastructure replacement.

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.

Response:

A.

- i. Map page 8, portion being redrawn to Duke Energy is a gated subdivision with approximately 24 customers. The portion being redrawn is a the cul-de-sac, deadend of the road. Redrawing this portion prevents dangerous duplicative electrical facilities and keeps the entire development under one electrical provider. Exact date service initiated unsure. Portion being redraw to TECO would eliminate duplicative facilities being installed, requiring multiple dangerous primary and secondary conductor crossings.
- ii. Map page 23 answered in question one response.

- iii. Map page 26 shows a parcel being redraw to Duke Energy. This parcel is owned by Duke Energy and is used as part of Duke Energy's electrical system. No external customers as being metered on this parcel.
- iv. Map page 32. This map change redraws one customer to Duke Energy. TECO has no facilities in the area to serve.
- v. Map page 34 shows a map redraw of approximately 17 customers on a dead-end road from TECO territory to Duke Energy territory. TECO would need to install over two miles of duplicative services, with no safe location to place them, to pick up these customers.
- vi. Map page 44 shows two portions of subdivisions being redrawn to TECO, approximately 50 lots, in which they serve the vast majority in their existing service territory. Redrawing these customers prevents the need for two utilities installing duplicative and dangerous underground conductors near each other to serve next door neighbors inside the same subdivision. This also reduces confusion during outage restoration.
- vii. Map page 46 is the Osprey Energy Complex, owned and operated by Duke Energy.
- viii. Map page 48 shows the redrawing of several parcels to TECO. These redraws allow parcels to be served entirely by one electric utility company rather than the parcel being split between electrical utility companies, reducing confusion to the end use customer or developer if future electric metering needs are requested.
- ix. Map page 49 redraws approximately 9 residential from TECO service territory permanently into Duke Energy territory. TECO would be required to install duplicative and dangerous facilities to serve these customers. The remainder of the boundary redraw does not currently have customers. These parcel redraws reduce split parcels with customers being served by two utility companies.
- x. Map page 52 is discussed in questions #2.
- xi. Map page 58 allows several apartment buildings to not be split between two utilities. The redraw allows Duke Energy to remain the electrical provider rather than two companies serving a portion of each building. The remainder of the parcel redraws to Duke Energy cleans up split parcels so the owner can work directly with one utility rather than two. The redraw to TECO allows a future development to be served by one electric utility rather than spitting future residents between companies and requiring the need for installation of duplicative facilities, causing dangerous crossings between companies.
- xii. Map page 59 shows a solar installation owned and operated by TECO used to provide voltage back onto their system.

- xiii. Map page 61 shows a portion of a subdivision being redrawn to TECO, approximately 30 lots, in which they serve the vast majority in their existing service territory. Redrawing these customers prevents the need for two utilities installing duplicative and dangerous underground conductors near each other to serve next door neighbors inside the same subdivision. This also reduces confusion during outage restoration.
- xiv. Map page 62 shows a portion of a subdivision being redrawn to TECO, approximately 15 lots, in which they serve the vast majority in their existing service territory. Redrawing these customers prevents the need for two utilities installing duplicative and dangerous underground conductors near each other to serve next door neighbors inside the same subdivision. This also reduces confusion during outage restoration.
 - i. Map page 63 shows the redrawing of a parcel to TECO. This redraw allows the parcel to be served entirely by one electric utility company rather than the parcel being split between electrical utility companies, reducing confusion to the end use customer or developer if future electric metering needs are requested.
 - ii. Map page 70 redraws a single Duke Energy customer into Duke Energy service territory. TECO does not have facilities in the area to serve this customer.
 - iii. Map page 72 redraws a single Duke Energy customer into Duke Energy service territory. TECO does not have facilities in the area to serve this customer.

B. **Response:**

We have not evaluated the connection period for each individual connection.

C. **Response:**

The Duke Energy GIS team has grown from one person to dozens of internal and contract partners. The increase in staff along with new technologies such as ARGUS layers, ESRI, territorial boundary mapping tools, and a dedicated territorial team has allowed research to be done down to footage rather than approximations on a “crayon” map. Accuracy has greatly improved and used on every site visit with new or prospective customers to determine whose territorial boundaries the metered service will fall into. The period of off cycle boundary reviews is done approximately every five years. These Duke Energy reviews are done in the field and not from a desk or computer terminal. TECO GIS team has grown and TECO does not periodically review its boundary lines in the field. Nonetheless, with every request submitted to TECO, TECO does perform a verification process of its boundary lines in the field.

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.

Response:

The boundary line changes are proposed, in part, to reduce the number of Extra-territorial customers identified in 3.A.

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.

Response:

The proposed territorial boundary line changes, if approved, would eliminate all known Extra-territorial customers.