



July 15, 2026

Phillip Ellis and Segundo Sanchez
Division of Engineering
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, Florida 32399-0688

Subject: Staff's 2nd Data Request re: OUC's 2026 Ten-Year Site Plan

Dear Mr. Ellis and Mr. Sanchez

Attached please find the Orlando Utilities Commission (OUC) responses to the subject data request. If you have any questions about the responses, please do not hesitate to contact me.

Respectfully submitted,

/s/ 

Bradley Kushner
Managing Director
nFront Consulting LLC
BradKushner@nFrontConsulting.com

- 1. Please identify and list any Department of Energy orders issued since 2023 that the Utility has been subject to. As part of this response, explain how these orders have impacted the Utility's planning or operations, and state whether these impacts are contained within the Utility's 2026 Ten-Year Site Plan (TYSP).**

OUC Response:

OUC has been subject to three DOE emergency orders under section 202(c) of the Federal Power Act:

- **Order No. 202-26-11:** Issued January 31, 2026 (Regarding Specified Resources – Env Limits)
- **Order No. 202-26-15:** Issued January 31, 2026 (Regarding Backup Generators)
- **Order No. 202-26-26:** Issued June 4, 2026 (Regarding the Stanton Energy Center)

Orders 202-26-11 and 15 were requested by OUC to preserve grid reliability during Winter Storm Fern/Gianna as extreme cold weather was projected to push customer demand past record-breaking thresholds. Operationally, these orders allowed OUC to dispatch specified generating units and backup generators up to their maximum output, notwithstanding standard air emissions or permit limitations, between January 31 and February 6, 2026. Because these were short-term temporary operational measures taken in early 2026 to avoid load shedding, they do not represent long-term structural or capacity changes to OUC's 2026 TYSP.

Order 202-26-26 was not requested and was issued after OUC's 2026 TYSP was published and is not directly contemplated within.

- 2. Please refer to OUC's 2026 TYSP, Schedules 2.2, Column (8), and 2.3, Column (6). As shown in Table 1 below, for 2026, while OUC projected a relatively higher annual growth in "Total No. of Customers" than what was projected for 2027 and 2028, the Utility projected 0.93 percent annual growth rate in "Total Sales to Ultimate Consumers," which is relatively lower than the projected growth rate in total sales for 2027 and 2028. Please explain the reason(s) behind the projected low 2026 total sales.**

Table 1. OUC's Projected Growth in Sales & Customer Numbers				
	Total Sales to Ultimate Consumers	Annual Increase	Total No. of Customers	Annual Increase
	(GWh)	(%)		(%)
Year	Sch. 2.2 (8)	Staff Calculated	Sch. 2.3 (6)	Staff Calculated
2024	7,295		282,179	
2025	7,459	2.25%	288,492	2.24%
2026	7,529	0.93%	294,390	2.04%
2027	7,778	3.31%	300,236	1.99%
2028	7,981	2.60%	306,005	1.92%

OUC Response:

“Total Sales to Ultimate Customers” reflects a comparison between 2026 forecasted sales under normal weather conditions and 2025 actual sales, which were not adjusted for normal weather. In 2025, actual cooling degree days (CDD) were above normal, resulting in higher sales than would have occurred under typical weather patterns. This elevated starting point causes the calculated year-over-year growth rate from 2025 to 2026 appear lower than in other years.

- 3. Please refer to the table below. Please explain and elaborate on the drivers for the reduction in OUC's PEV count forecast over the planning period from its 2025 TYSP and 2026 TYSP.**

	2025 TYSP PEVs	2026 TYSP PEVs	Difference	% Difference
2026	52,668	44,800	-7,868	-14.94%
2027	70,755	57,357	-13,398	-18.94%
2028	90,379	71,148	-19,231	-21.28%
2029	112,045	86,392	-25,653	-22.90%
2030	135,704	105,135	-30,569	-22.53%
2031	161,275	124,944	-36,331	-22.53%
2032	188,730	145,534	-43,196	-22.89%
2033	215,352	162,252	-53,100	-24.66%
2034	239,003	175,976	-63,027	-26.37%

Source: OUC's response to Staff Data Request #1, Question 31; OUC's response to similar staff question in 2025.

OUC Response:

The reduction in forecasted electric vehicles when comparing OUC's 2025 TYSP to OUC's 2026 TYSP is driven largely by the impact of federal regulatory changes. The primary regulatory driver is the expiration of federal tax credits offered for electric vehicle purchase. These regulatory changes drove a temporary increase in EV sales by buyers taking advantage of the tax credit prior to its' expiration in 2025 followed by lower-than-expected electric vehicle sales in subsequent months. Industry sales forecasts indicate a slower rate of new EV sales than historical averages because of reductions in electric vehicles available for purchase in addition to the elimination of EV purchase and tax incentives.

4. Please refer to the table below. Please explain and elaborate on the drivers for the significant increase in OUC's public PEV charging station forecast over the planning period from its 2025 TYSP and 2026 TYSP.

	2025 TYSP PEV Charging Stations	2026 TYSP PEV Charging Stations	Difference	% Difference
2026	14,249	47,137	32,888	230.81%
2027	18,716	60,310	41,594	222.24%
2028	23,581	74,862	51,281	217.47%
2029	28,987	90,965	61,978	213.81%
2030	34,830	109,586	74,756	214.63%
2031	41,218	130,724	89,506	217.15%
2032	48,096	152,844	104,748	217.79%
2033	54,926	174,362	119,436	217.45%
2034	61,310	193,568	132,258	215.72%

Source: OUC's response to Staff Data Request #1, Question 31; OUC's response to similar staff question in 2025.

OUC Response:

An error was discovered in the formula used to calculate the forecast number of PEV charging stations required as presented in response to Question No. 31 of Staff's Data Request #1. The corrected version of the response to Question No. 31 is shown below.

Year	Number of PEVs	Number of Public PEV Charging Stations	Number of Public DCFC PEV Charging Stations	Cumulative Impact of PEVs		
				Summer Demand (MW)	Winter Demand (MW)	Annual Energy (GWh)
2026	44,800	11,069	124	37	59	243
2027	57,357	14,162	159	47	76	311
2028	71,148	17,579	197	34	35	386
2029	86,392	21,360	240	42	43	469
2030	105,135	25,733	289	50	64	565
2031	124,944	30,696	344	60	79	674
2032	145,534	35,891	403	70	89	788
2033	162,252	40,943	460	80	102	899
2034	175,976	45,453	510	89	113	998
2035	191,601	50,053	562	97	124	1,099

5. Please refer to the table below. Please explain and elaborate on the drivers for the reduction in OUC's forecasted PEV impact to Summer peak (MW) over the planning period from its 2025 TYSP and 2026 TYSP.

	2025 TYSP PEV Summer Demand	2026 TYSP PEV Summer Demand	Difference	% Difference
2026	76	37	-39	-51.39%
2027	100	47	-53	-52.99%
2028	126	34	-92	-73.02%
2029	155	42	-113	-72.86%
2030	186	50	-136	-73.16%
2031	220	60	-160	-72.78%
2032	257	70	-187	-72.79%
2033	294	80	-214	-72.78%
2034	328	89	-239	-72.88%

Source: OUC's response to Staff Data Request #1, Question 31; OUC's response to similar staff question in 2025.

OUC Response:

OUC has modified its' forecast for summer demand based on two primary factors – first, an anticipated reduction in the number of EVs directly related to the changes in the regulatory environment as documented in response to Question No. 3 herein and secondly, changes anticipated in the load curve driven by the 'Shift & Save' time of use program, which is expected to be implemented in 2028/2029.

6. Please refer to OUC' Response to Staff Data Request #1, Question 31. The number of PEVs significantly outnumbered the PEV Charging Stations in 2025 for all forecast years. Why does OUC project more PEV charging stations will be available in each of the forecast years in the 2026-2035 horizon than there will be PEVs in the Utility's service territory?

OUC Response:

As noted in the response to Question No. 4 herein, OUC discovered an error in the formula used to calculate the number of charging stations required in the territory. Using the revised numbers, the ratio of charging stations to vehicles is slightly higher than indicated in the 2025 TYSP.

OUC attributes the rise in the ratio of vehicles to chargers to a larger charging transaction data set which improves the accuracy of OUC's estimation of energy dispensed by each charging port. OUC also attributes the shift to an increased number of DCFC charging ports available for use in its territory, requiring fewer Level 2 PEV Charging Stations to complete a similar number of charging events, distributing more energy volume per day.