



July 15, 2026

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Attn: Adam Teitzman

Re: 2026 Ten Year Site Plan – Staff's Data Request 2

Dear Mr. Teitzman,

Please find a response to the data request 2 for Lakeland Electric.

If you have questions please contact me at 863-834-6595.

Sincerely,

/s/Cynthia Clemmons

Cynthia Clemmons
City of Lakeland
Manager of Legislative and Regulatory Relations
Lakeland Electric
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Enclosure

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).

There is only one DOE order issued at Lakeland Electric in U.S. Department of Energy (DOE)'s 2023, 2024, 2025, or 2026 order listings - DOE Emergency Order No. 202-26-14 — Winter Storm Fern (January–February 2026)

Event Overview:

Winter Storm Fern brought historic cold to Central Florida, with temperatures falling as low as 24°F on February 1 and 26°F on February 2. The six days of exceptional cold from January 29 to February 3 drove the utility's Electric demand to record levels and pushed Southeast regional natural gas prices as high as \$78/MMBtu, prompting emergency actions by the Balancing Authority and federal agencies, including DOE through Emergency Order No. 202-26-14 issued under Section 202(c) of the Federal Power Act.

System Performance:

Lakeland Electric's demand peaked as high as 783 MW on February 2, surpassing the utility's highest winter peak of the last 15 years. Despite very tight reserve margins and some unit performance issues, energy supply was managed with emergency energy purchases to maintain system integrity and reliability even under regional scarcity. The record peak load was also managed in part through customer conservation and demand-side support: public messaging urged voluntary load reductions during critical morning peaks, and Lakeland Electric requested that customers with emergency generation run their behind-the-meter units to serve their own load. The resulting load reduction directly supported system reliability and enhanced Lakeland Electric's reserve margin during the most constrained operating hours.

Lakeland Electric dispatched a deliberately diversified fleet: McIntosh Unit 5 and the McIntosh Reciprocating Engine Plant ran on natural gas, while Winston, Larsen, and McIntosh Gas Turbines 1 and 2 (dual-fuel capable) operated on fuel oil (diesel) - a switch justified on both economic and reliability grounds. Economically, natural gas that normally traded near \$4.25/MMBtu reached extreme prices in Florida as Lakeland competed with Northeastern buyers on the same pipeline system; operationally, shifting these units to fuel oil freed up scarce natural gas supply for the units that depended on it, strengthening fuel reliability across the fleet. Dual-fuel capability thus functioned as both a price hedge and a supply buffer.

Role of the DOE Order:

Although Order No. 202-26-14 authorized Lakeland Electric to operate its generating units notwithstanding applicable environmental emissions limits, the utility remained in full compliance with all permit limits throughout the event. The order's primary value was therefore as a safeguard - had extreme conditions that required units to run beyond their permit limits to maintain reliable service, operations could have continued rather than shutting down, as would normally be required. Just as importantly, the order gave Lakeland Electric the operational cushion to call on behind-the-meter emergency diesel units at customer facilities — including the City's Water Department and large industrial customers — which operated to reduce Lakeland

Electric’s system load, adding a further increase in system reserves. Lakeland Electric submitted a report to DOE - also shared with Florida Department of Environmental Protection - covering the behind-the-meter generation operating hours, strengthening federal and state situational awareness. In the end, the system margin — reinforced by emergency energy purchases, fuel switching, and customer conservation — meant these DOE-authorized backup resources served as a reliability enhancement.

Lessons Learned and Strategic Response:

The event provided Lakeland Electric with valuable lessons that are shaping its long-term resource planning and operations, resulting in the following planned actions:

1. A Title V permit modification to raise dual-fuel McIntosh Gas Turbine 2’s allowable full-load operating hours on natural gas from 812 (~9% capacity factor) to approximately 2,890 (~33%).
2. A capital project to expand fuel oil storage at the Larsen Plant, extending dual-fuel run time during prolonged gas disruptions.
3. New portfolio additions, including solar resources, complemented by future exploration of load control options and customer incentives to provide operational flexibility during extreme weather events such as Winter Storm Fern.

Notably, because the 2026 Ten-Year Site Plan reflects the planning and operational activities through December 2025 and predates the event, these impacts are not captured in the latest TYSP. They will instead be reflected in next year's plan, which will incorporate fuel diversity and dual fuel capability as planning priorities and include feasibility studies on load control — engaging interruptible customers by providing incentives for their participation during emergencies caused by extreme weather events.

2. Referring to Lakeland Electric’s (LAK) 2025 and 2026 TYSPs, Schedule 2.3, (which is Table 8-4 within LAK’s TYSPs), “History and Forecast of Energy Consumption and Number of Customers by Customer Class,” please explain the reporting discrepancies shown in Table 1 below and provide revisions, if applicable.

Table 1: Lakeland Electric 's Reported Historical Data						
	Schedule 2.3					
	Column (4): Net Energy for Load (GWh)			Column (6): Total No. of Customers		
	2026 TYSP	2025 TYSP	Difference	2026 TYSP	2025 TYSP	Difference
	(a)	(b)*	(c) = (a) - (b)	(d)	(e)*	(f) = (d) - (e)
2016	3,109	3,126	-17	127,152	125,674	1,478
..						
2020				134,242	134,320	-78

*Numbers used for LAK's 2025 TYSP are quoted from LAK's response to Staff's 2nd Data Request regarding LAK's 2025 TYSP, filed on 5/5/2025, as well as LAK's Revised 2025 TYSP, filed on 6/27/2025.

The discrepancies shown in Table 1 resulted from typographical errors in Lakeland Electric's (LAK) 2025 TYSP. Each is addressed below.

2016 — Net Energy for Load and Total Number of Customers (Columns c and f):

The values reported in the 2026 TYSP — 3,109 GWh of net energy for load and 127,152 total customers — are correct. The 2025 TYSP values of 3,126 GWh and 125,674 customers were typographical errors. The 2026 TYSP figures are consistent with the historical values

reported in LAK's prior TYSP filings, and no revision to the 2026 TYSP is required. Revised 2025 TYSP figures were provided to the Florida Public Service Commission on June 27, 2025; however, these corrections are not reflected in the publicly available version of the document.

2020 — Total Number of Customers (Column f): The value reported in the 2026 TYSP (134,242) is correct. The 2025 TYSP value of 134,320 was a typographical error. As with the 2016 figures, corrected values were submitted to the Commission on June 27, 2025, but are not reflected in the publicly available document.

Lakeland Electric has reviewed its reporting procedures to help ensure historical data is accurately presented in future TYSP submissions. No revisions to the 2026 TYSP are required.