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May 15, 2025

VIA: ELECTRONIC FILING

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

Re: Petition to resolve territorial dispute in Gadsden County with the City of Quincy, by
Talquin Electric Cooperative, Inc.; FPSC Docket No. 20250039-EU

Dear Mr. Teitzman:

Attached for filing in the above docket is Talquin Electric Cooperative's Response to
Staff's Third Data Request (Nos. 1-6) propounded on May 1, 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

Attachment

cc: All Parties of Record (w/encl.)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Talquin Electric Cooperative's responses to Staff's Third Data Request (Nos.1-6) have been furnished by electronic mail on this 15th day of May 2025 to the following:

Ms. Suzanne Brownless
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us

Mr. Gary A. Roberts
City Attorney, Quincy, Florida
130 Salem Court
Tallahassee, FL 32301
garyr@garyrobertslaw.com



ATTORNEY

TALQUIN ELECTRIC COOPERATIVE
DOCKET NO. 20250039-EU
STAFF'S **THIRD** DATA REQUEST
REQUEST NO. 1
BATES PAGE(S): 11-13
FILED May 15, 2025

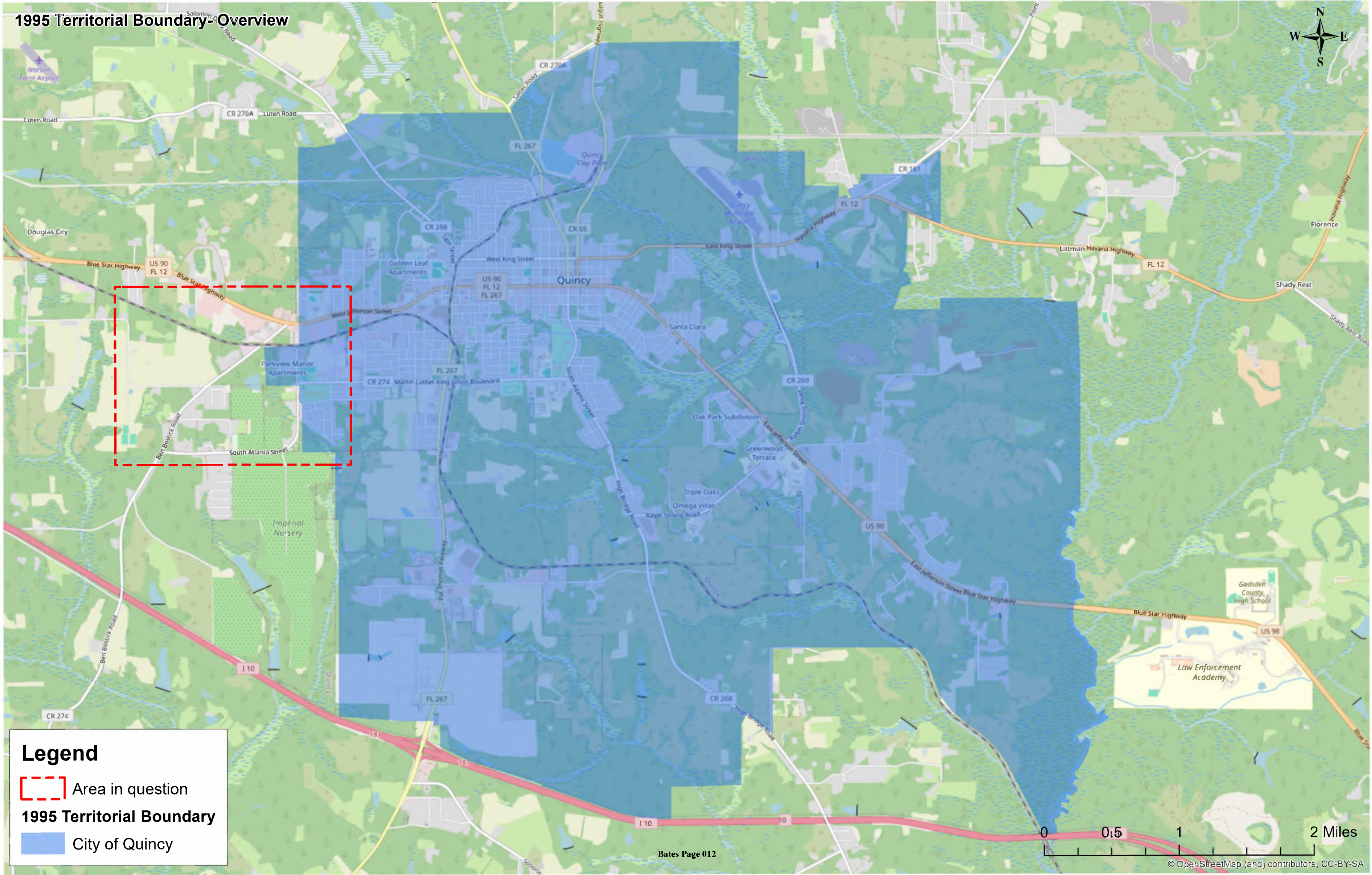
1. Overlaid on the map provided, please provide clearly defined designations of the 1995 territorial boundaries. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.

TALQUIN'S RESPONSE to 1: See Map 1 and Map 1(a) below.

Map 1 depicts the entire Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement with a red box outlining the specific area in dispute. All of the area surrounding the area denoted in blue highlight constitutes Talquin Territory pursuant to the 1995 Territorial Agreement.

Map 1(a) depicts the area in question adjacent to the Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement with a red box outlining the specific area in dispute. The remaining area constitutes Talquin Territory pursuant to the 1995 Territorial Agreement.

1995 Territorial Boundary- Overview



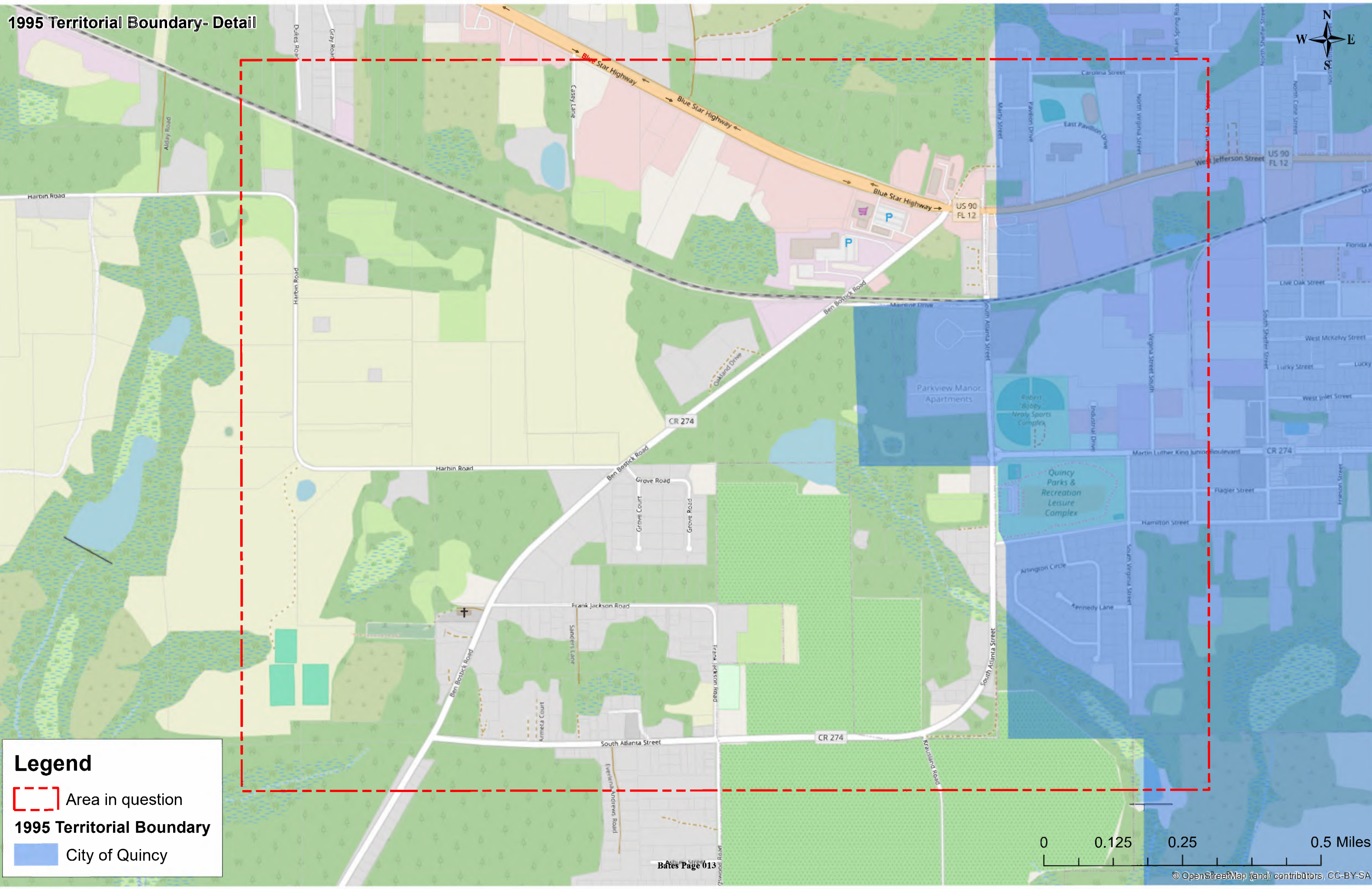
Legend

Area in question

1995 Territorial Boundary

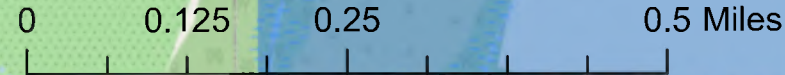
City of Quincy

1995 Territorial Boundary- Detail



Legend

- Area in question
- 1995 Territorial Boundary**
- City of Quincy



TALQUIN ELECTRIC COOPERATIVE
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BATES PAGE(S): 14-16
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2. Overlaid on the map provided, please provide clearly defined designations of the existing territorial boundaries. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.

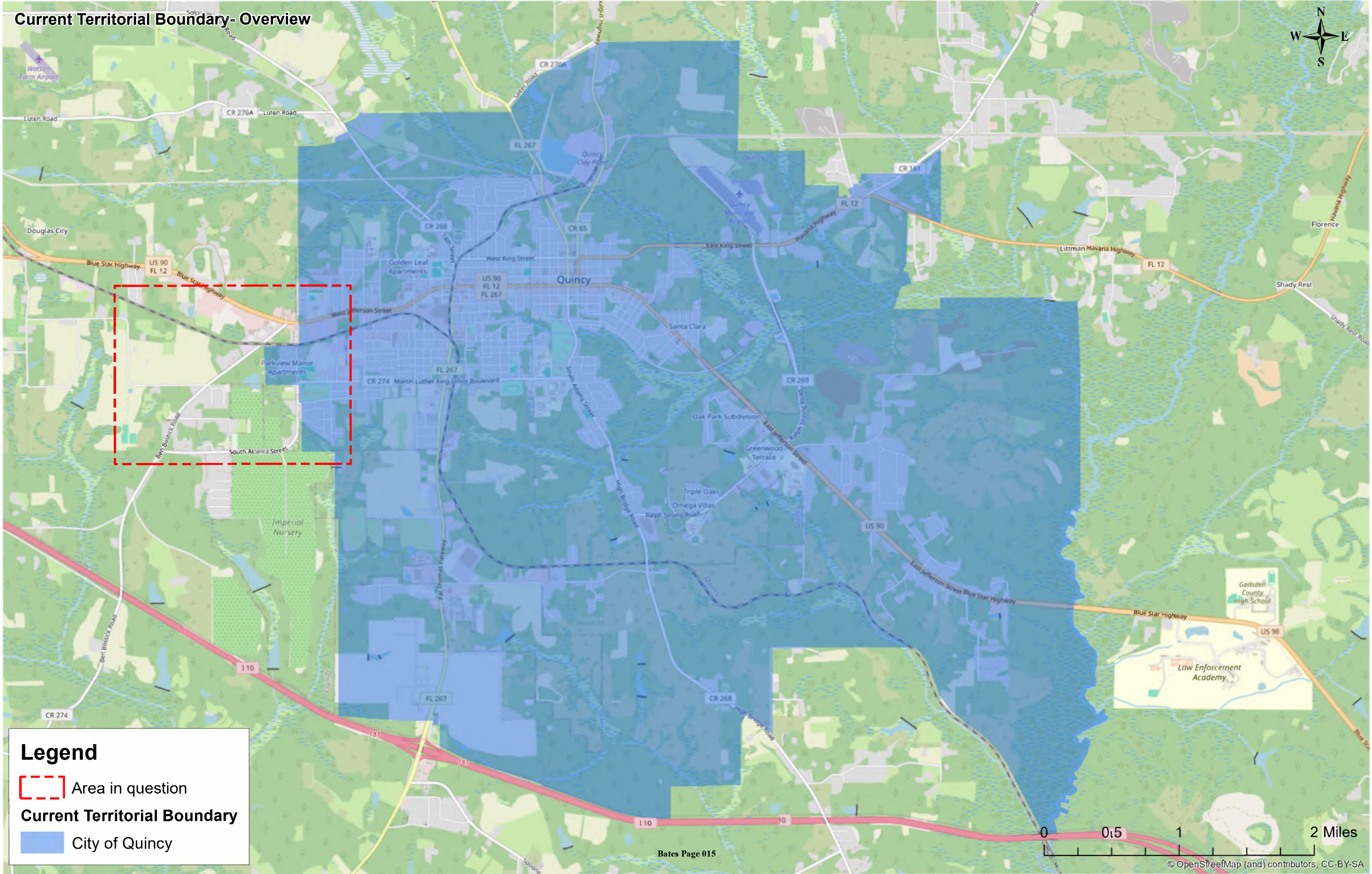
TALQUIN'S RESPONSE: See Map 2 and Map 2(a) below. These maps are identical to Map 1 and Map 1(a).

The 1995 Territorial Agreement expired on December 11, 2010. However, until now, Talquin and Quincy have continued to operate within the territories defined by the 1996 Territorial Agreement unless express permission was provided to serve within the other's historic territory.

Map 2 depicts the entire Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement with a red box outlining the specific area in dispute. All of the area surrounding the area denoted in blue highlight constitutes Talquin Territory pursuant to the 1995 Territorial Agreement.

Map 2(a) depicts the area in question adjacent to the Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement with a red box outlining the specific area in dispute. The remaining area constitutes Talquin Territory pursuant to the 1995 Territorial Agreement.

Current Territorial Boundary- Overview



Legend

Area in question

Current Territorial Boundary

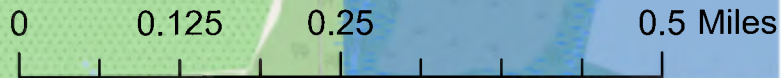
City of Quincy



Area in question

Current Territorial Boundary

City of Quincy



TALQUIN ELECTRIC COOPERATIVE
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REQUEST NO. 3
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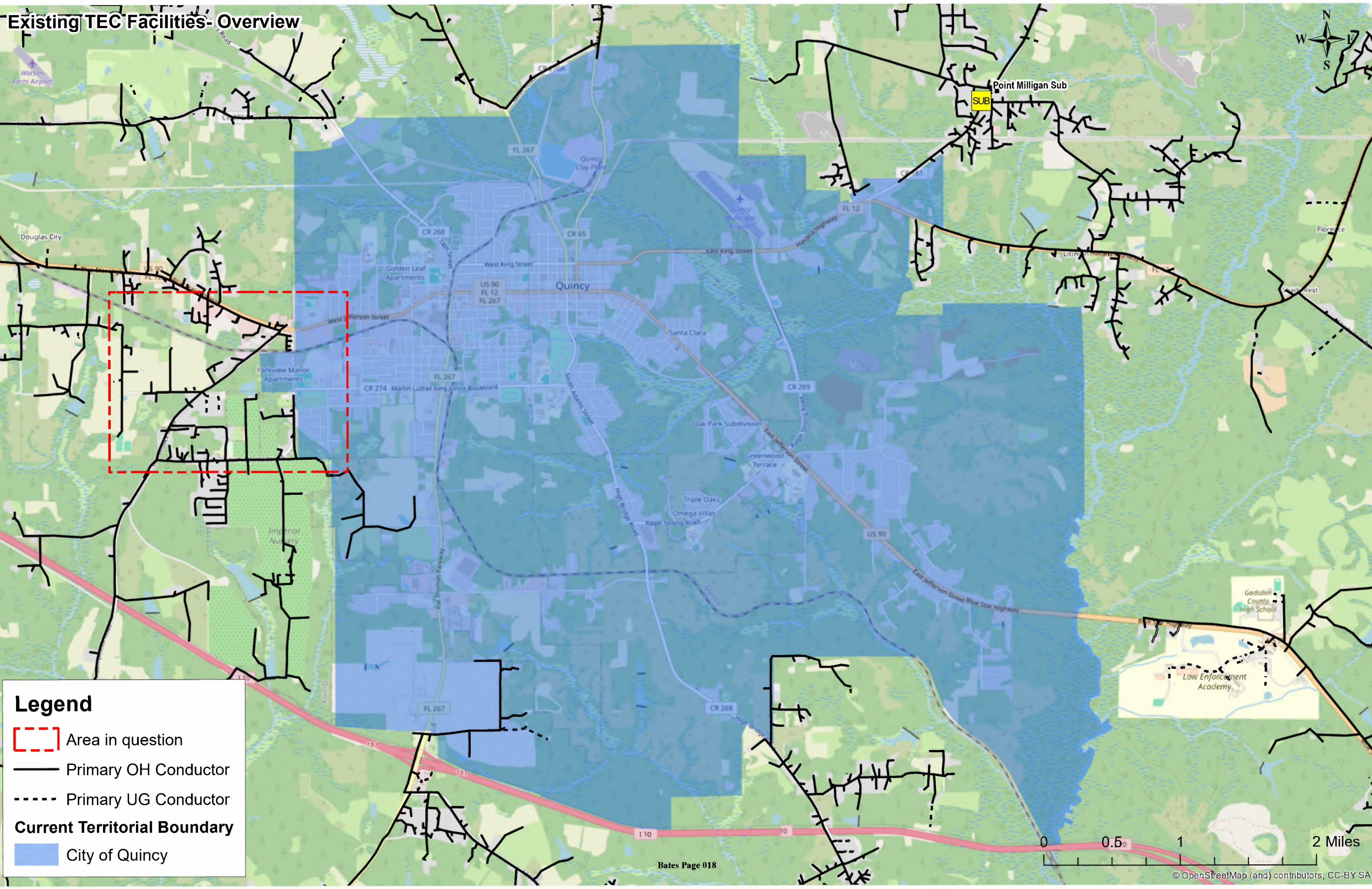
3. Overlaid on the map provided, please provide clearly defined designations of Talquin's existing service facilities. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.

TALQUIN'S RESPONSE to 3: See Map 3 and Map 3(a) below.

Map 3 depicts Talquin's existing facilities in black – both primary overhead and primary underground – in the area surrounding the entire Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement with a red box outlining the specific area in dispute. All of the area surrounding the area denoted in blue highlight constitutes Talquin Territory pursuant to the 1995 Territorial Agreement.

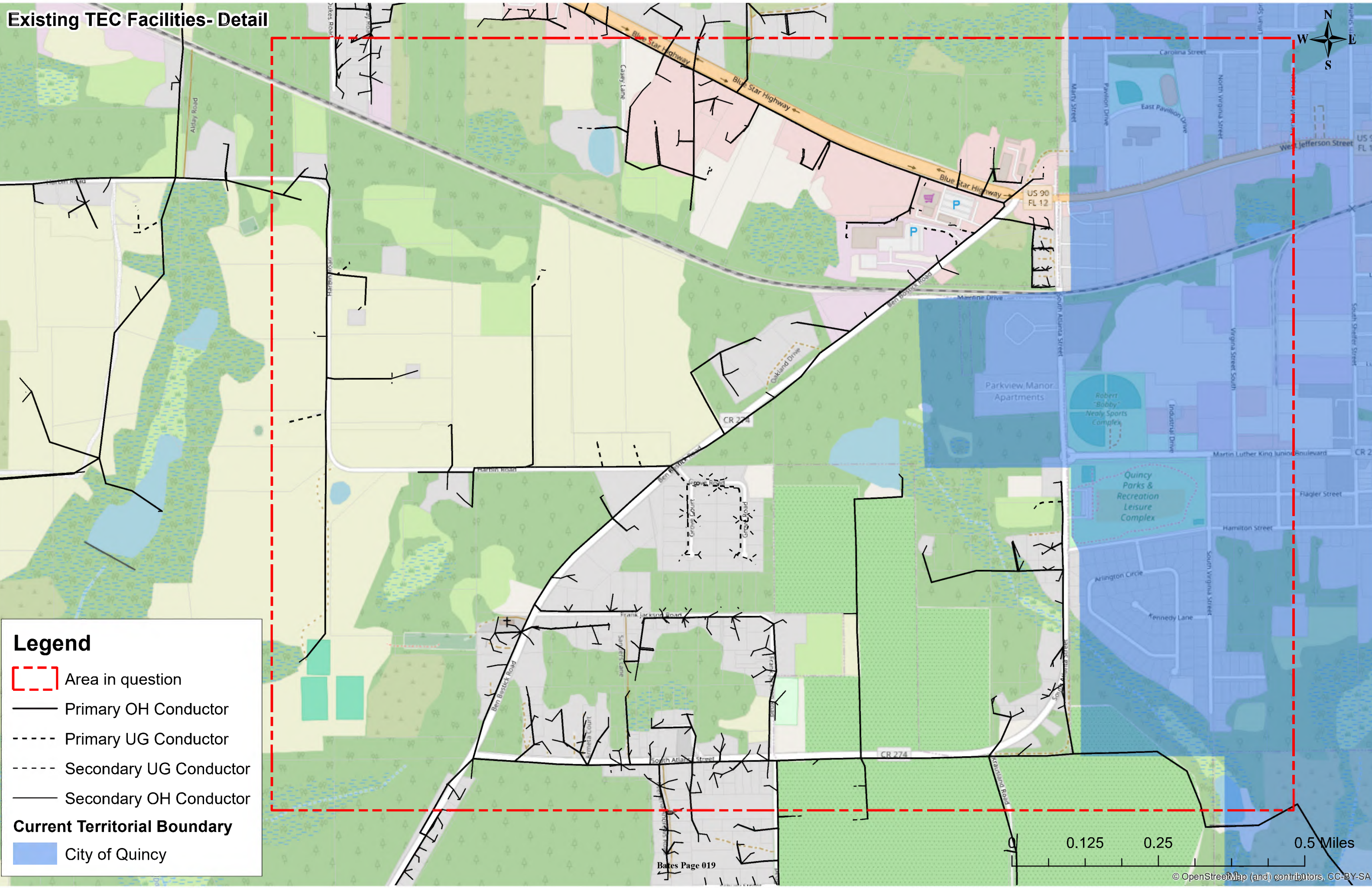
Map 3(a) depicts Talquin's existing facilities in black – both primary and secondary overhead and primary and secondary underground – in the area in question adjacent to the Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement with a red box outlining the specific area in dispute.

Existing TEC Facilities- Overview



Bates Page 018

Existing TEC Facilities- Detail



Legend

Area in question

Primary OH Conductor

Primary UG Conductor

Secondary UG Conductor

Secondary OH Conductor

Current Territorial Boundary

City of Quincy

TALQUIN ELECTRIC COOPERATIVE
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REQUEST NO. 4
BATES PAGE(S): 20-22
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4. Overlaid on the map provided, please provide clearly defined designations of Talquin's proposed serving facilities. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.

TALQUIN'S RESPONSE: See Map 4 and Map 4 (a) below.

Map 4 depicts Talquin's existing facilities in black – both primary and secondary overhead and primary and secondary underground – in the area in question adjacent to the Quincy Territory (denoted in blue) pursuant to the 1995 Territorial Agreement with a red box outlining the specific area in dispute. In addition, Map 4 depicts the location of the single riser pole (described in Talquin's Response 3(a) to Staff's First Data Request) necessary for Talquin to serve the Bostick Road Property Development.

Map 4(a) zooms in to provide more detail – it depicts Talquin's existing facilities in black – both primary and secondary overhead and primary and secondary underground – in the area in question adjacent to the Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement. In addition, Map 4(a) depicts the location of the single riser pole and the single span of three phase overhead primary necessary for Talquin to serve the Bostick Road Property Development (See Talquin's Response 3(a) to Staff's First Data Request).

Proposed TEC Facilities- Overview

●

Proposed Riser Pole

Proposed Primary OH Conductor

Area in question

Primary OH Conductor

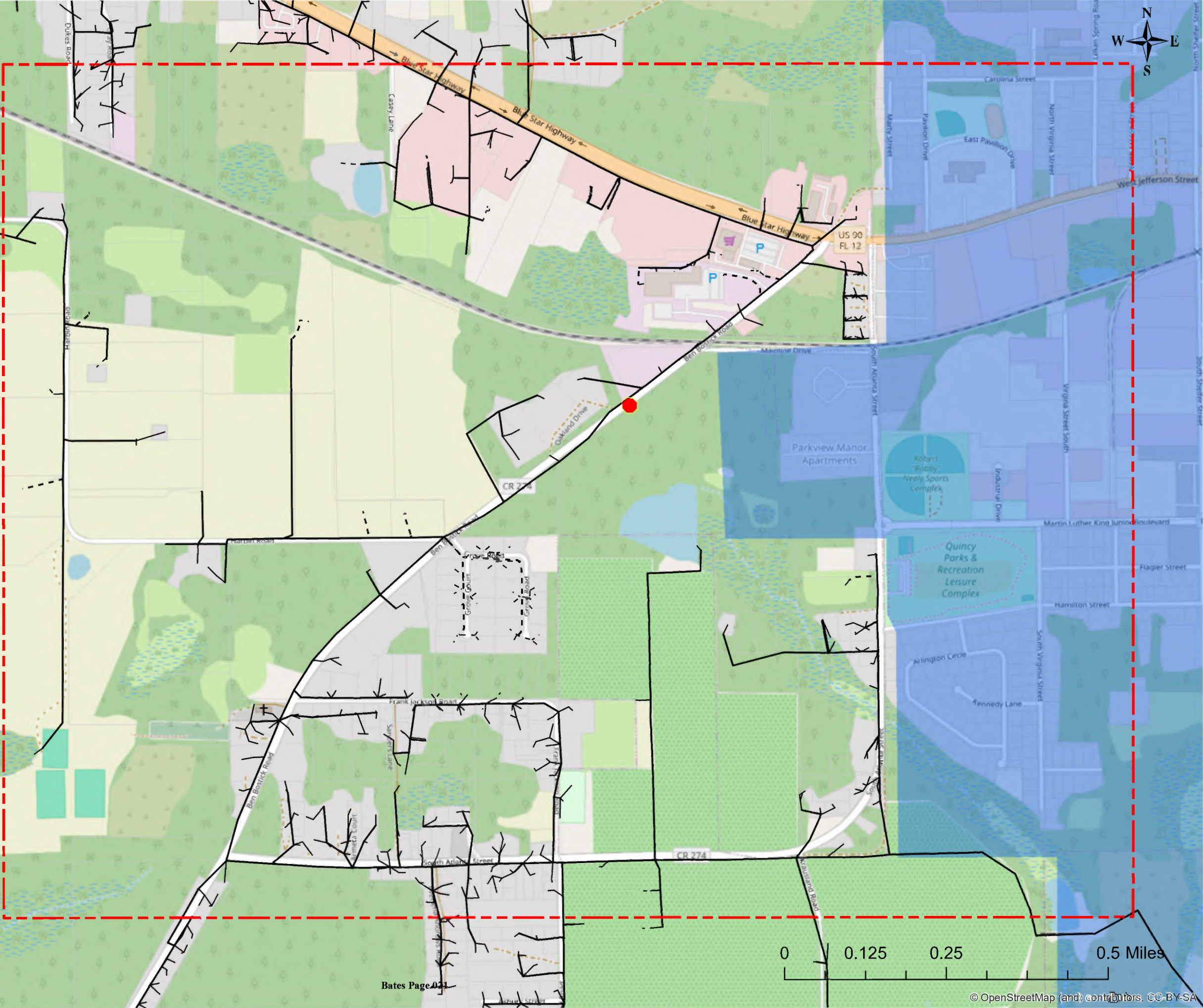
Primary UG Conductor

Secondary UG Conductor

Secondary OH Conductor

Current Territorial Boundary

City of Quincy



Proposed TEC Facilities- Detail



Legend

- Proposed Riser Pole
- Proposed Primary OH Conductor
- Primary OH Conductor
- Primary UG Conductor
- Secondary UG Conductor
- Secondary OH Conductor

Current Territorial Boundary

- City of Quincy



TALQUIN ELECTRIC COOPERATIVE
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5. Overlaid on the map provided, please provide clearly defined designations of Phase 1 through Phase 4 of the proposed development areas. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.

TALQUIN'S RESPONSE: See Map 5 and Map 5(a) below.

Map 5 depicts Talquin's existing facilities in black – both primary and secondary overhead and primary and secondary underground – in the area in question adjacent to the Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement with a red box outlining the specific area in dispute. In addition, Map 5 depicts Talquin's understanding of the proposed Development Phases 1-4.

Map 4(a) zooms in to provide more detail – it depicts Talquin's existing facilities in black – both primary and secondary overhead and primary and secondary underground – in the area in question adjacent to the Quincy Territory (denoted in blue highlight) pursuant to the 1995 Territorial Agreement. In addition, Map 5 depicts Talquin's understanding of the proposed Development Phases 1-4.

Proposed Development Areas- Overview



Legend

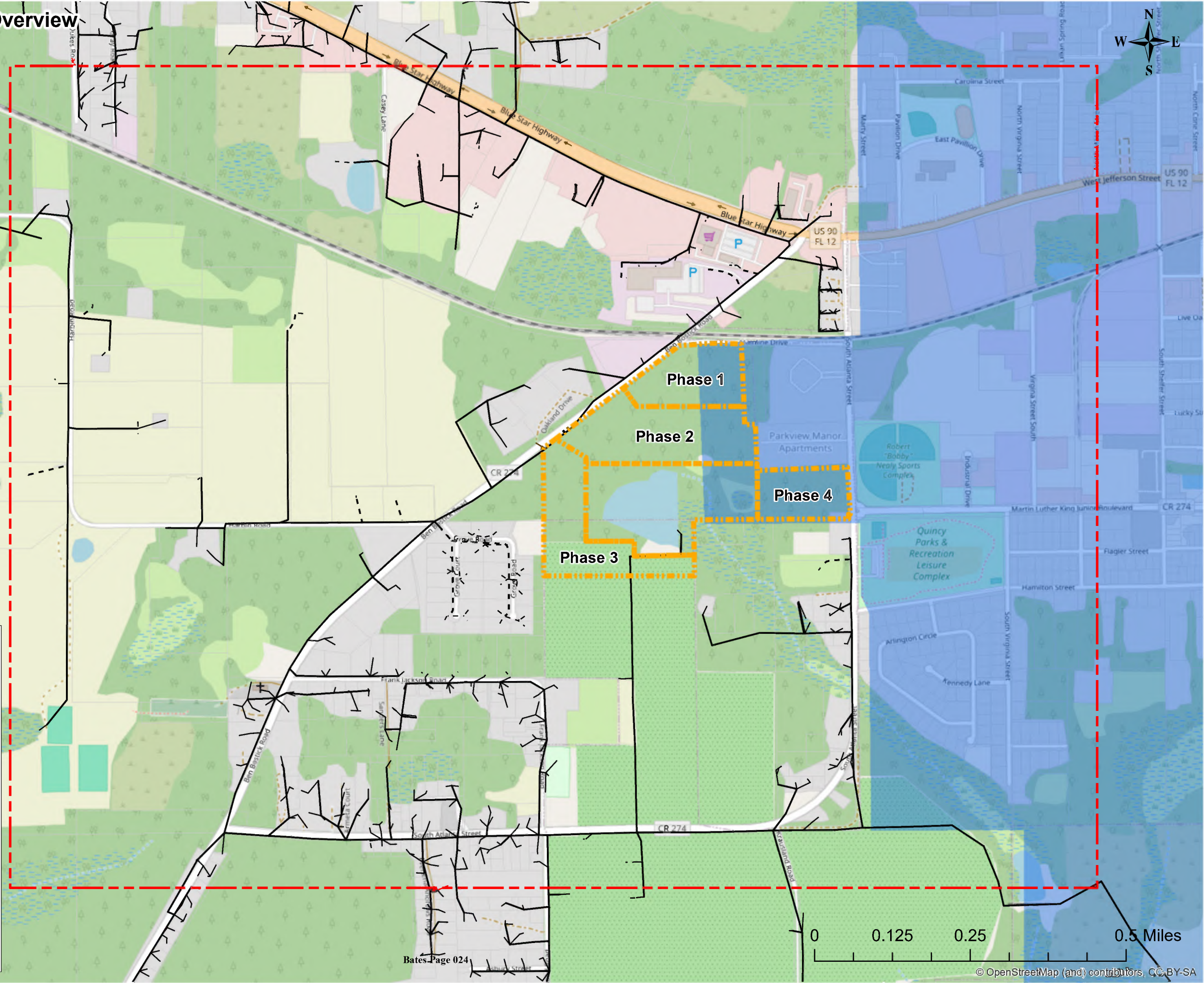
- Area in question
- Primary OH Conductor
- Primary UG Conductor
- Secondary UG Conductor
- Secondary OH Conductor

Current Territorial Boundary

- City of Quincy

Proposed Development- Estimated

-



Proposed Development Areas- Detail



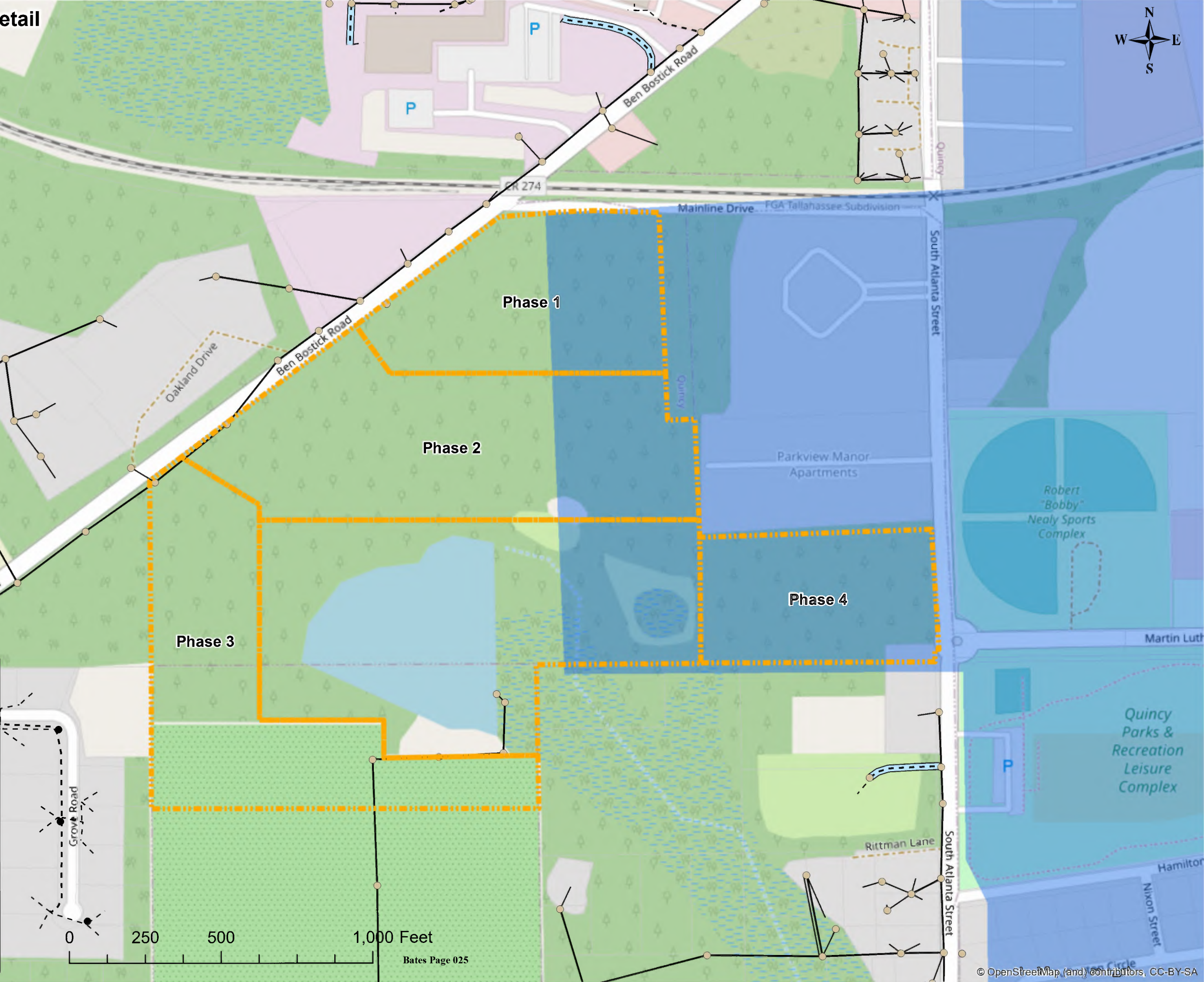
Legend

- Primary OH Conductor
- Primary UG Conductor
- Secondary UG Conductor
- Secondary OH Conductor

Current Territorial Boundary

- City of Quincy

Proposed Development- Estimated



TALQUIN ELECTRIC COOPERATIVE
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REQUEST NO. 6
BATES PAGE(S): 26
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6. In response to Staff's First Data Request No. 5.b., Quincy stated, "As detailed in Quincy's Opposition, granting Talquin's Petition would bring the distribution equipment, lines and transformers on the two utilities into dangerous and unnecessary physical proximity."

Which utility does Talquin believe should serve Phase 4 of the Bostic Property development?
Please explain your response.

TALQUIN RESPONSE: Talquin has been consistent in its position that the territorial boundaries from the 1995 Territorial Agreement should be reinstated with no adjustments unless otherwise agreed upon by both Talquin and Quincy (subject to the Commission's approval). Therefore, Talquin acknowledges that, because Phase 4 is entirely within the Quincy Territory under the 1995 Territorial Agreement, that Quincy should serve Phase 4 – assuming that the same rationale is applied to Phases 1-3 and Talquin is entitled to serve these Phases because of the majority of each lies within the Talquin Territory under the 1995 Territorial Agreement.