

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Territorial Dispute Between)
Talquin Electric Cooperative, Inc. and)
the City of Quincy)
_____))
DOCKET NO. 20250039-EU

FILED: May 15, 2025

**CITY OF QUINCY'S RESPONSES TO THE PSC's
THIRD DATA REQUEST**

The City of Quincy ("Quincy"), by and through the undersigned counsel, hereby respectfully submits the following answers to the questions posed by the PSC in its letter dated May 1, 2025 (hereinafter "TDR" for "Third Data Request"). All previous exhibits to and nomenclature defined in Quincy's Opposition to the Talquin Petition and Quincy's Responses to the FDR and SDR are hereby incorporated by reference as if restated verbatim herein.

PSC TDR 1. "Overlaid on the map provided, please provide clearly defined designations (with a key) of the 1995 territorial boundaries. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail."

Quincy's RESPONSE to 1:

See page 1 of Exhibit A to this Response. The 1995 Territorial Boundary is marked in rust/orange. Page 2 of Exhibit A locates the area depicted on the 1995 Territorial Map.

PSC TDR 2. "Overlaid on the map provided, please provide clearly defined designations (with a key) of the existing territorial boundaries. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail."

Quincy's RESPONSE to 2:

See Exhibit B to this Response. Territory annexed by the City in February 2025 is indicated in green.

PSC TDR 3. “Overlaid on the map provided, please provide clearly defined designations (with a key) of Quincy’s existing service facilities. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.”

Quincy’s RESPONSE to 3:

See Exhibits A and B to this Response. QE’s primary distribution lines are in blue, and existing residential lines are in magenta. The existing residential lines depicted serve the Parkview Garden and Parkview Manor apartments. The Parkview apartments are multi-family residential developments that have been served by Quincy Electric since construction, circa 1979

PSC TDR 4. “Overlaid on the map provided, please provide clearly defined designations (with a key) of Quincy’s proposed serving facilities. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.”

Quincy’s RESPONSE to 4:

See Exhibit C to this Response. The proposed extension to QE’s primary distributions lines is depicted in forest green. Note that QE has modified its current plan to electrify the proposed new developments since filing of its responses to the FDR and TDR. We no longer plan to cross Bostick Road.

This change in plan reflects and was driven by Gen Land’s finalization of the Phase 1 platting. Further explanation will be provided in a forthcoming supplement to Quincy’s Opposition to the Talquin Petition, planned for filing early in the week of May 19, 2025.

PSC TDR 5. “Overlaid on the map provided, please provide clearly defined designations (with a key) 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.”

Quincy’s RESPONSE to 5:

See Exhibit D. Page 1 depicts Phase 1 in teal and Phase 4 in bright red. Page 2 includes the area of Phases 2 and 3 in yellow. Page 3 is the Gen Land plat map, previously exhibited by Quincy’s Response to the SDR.

PSC TDR 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.’

Please indicate on the maps provided the area(s) where Quincy believes the electric facilities will be in dangerous and unnecessary physical proximity if Talquin provides electric service to:

- Bostick property, exclusive of Phase 4 of the development project. (Map 1)
- Bostick property and Phase 4 of the development project. (Map 2)”

Quincy’s RESPONSE to 6:

As depicted in Exhibit D, page 2, Phase 4 is adjacent to both existing residential connections and QE’s primary distribution line from the South substation. There also is currently no public right of way for Phases 2 and 3, and any potential access will directly border the residential areas directly east of the development. This includes proximity of Phase 1 to the Parkview Garden apartments.

Details of distances and further analysis of the consequences of allowing Talquin to cross Ben Bostick Road are forthcoming in the aforementioned supplemental response to Quincy’s Opposition to the Talquin Petition.

PSC TDR 7. “In response to Staff’s Second Data Request No. 3.b., Quincy stated, ‘Quincy Electric did not plan our capital expenditures and investments based on the expired Agreement.’ Please explain what basis Quincy used for planning capital

expenditures and investments with respect to territorial boundary lines in the proximity of the Bostick property.”

Quincy’s RESPONSE to 7:

As noted in our Opposition and responses to the FDR and SDR, the South Distribution Substation currently operates – at peak – at less than 2/3 of capacity. This was planned for when that Substation was constructed circa 2000, in anticipation of future City expansion and population growth to the south.

Respectfully submitted this **15th** day of May, 2025.

LLC

GARY A. ROBERTS & ASSOCIATES,

/s/ Gary A Roberts

GARY A. ROBERTS, ESQUIRE

FLORIDA BAR NO. 0069620

130 Salem Court

Tallahassee, Florida 32301

(850) 513-0505

(850) 513-0318-Facsimile

Email: garyr@garyrobertslaw.com

City Attorney, for City of Quincy, FL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished electronically to attorney Malcom N. Means for Talquin Electric Cooperative and Suzanne Brownless, Office of the General Counsel, Public Service Commission, on this 15th day of May 2025.

/s/ Gary A. Roberts

GARY A. ROBERTS, ESQUIRE

EXHIBIT A

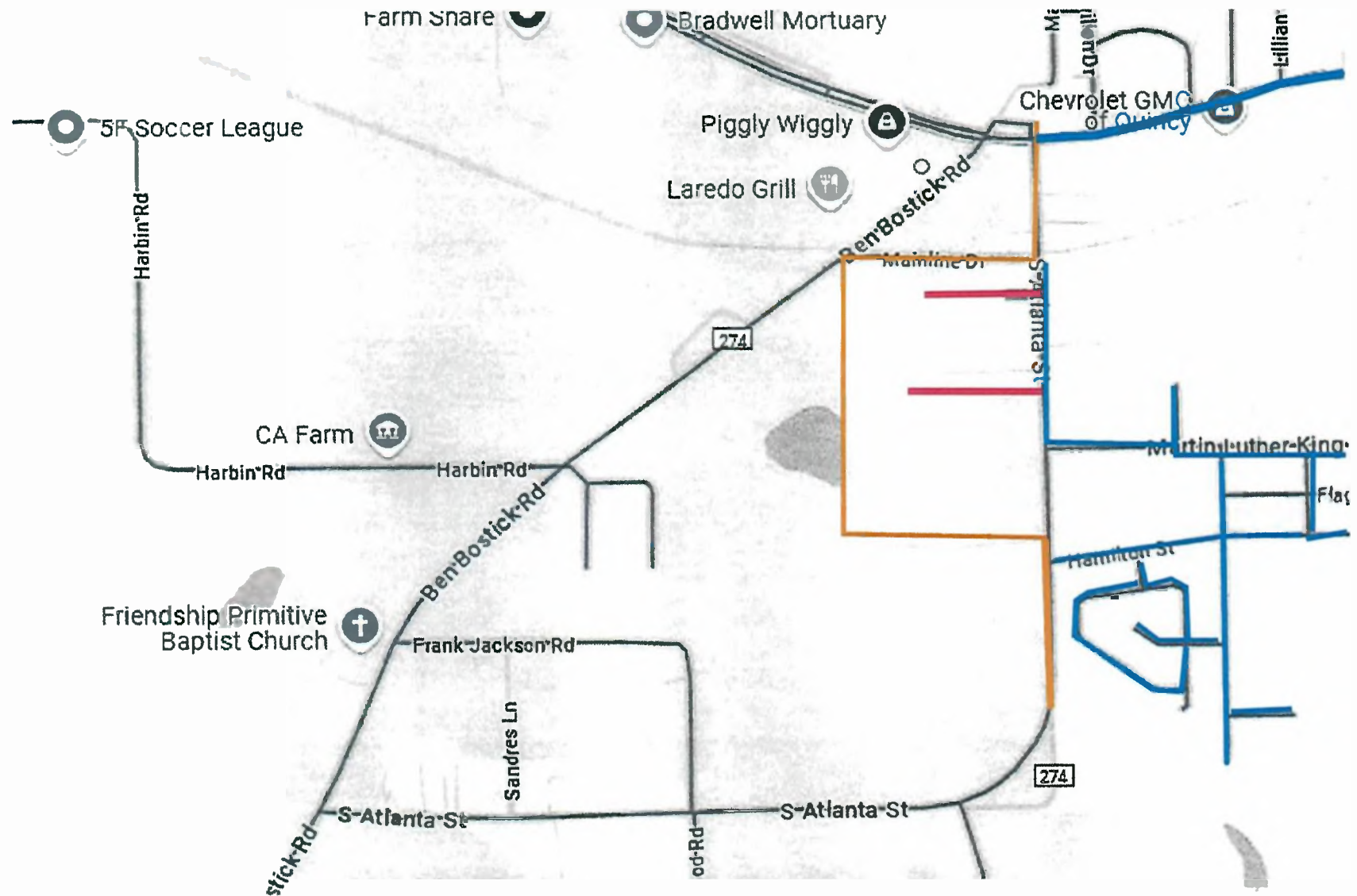
To the Quincy Response to the PSC's Third Data Request

Map indicating 1995 Boundary and Existing Facilities

● 1995 Territorial Agreement Boundary

● Existing 12.47Kv Primary Distribution Lines

● Existing Residential Connections





Approximate TDR Map Area

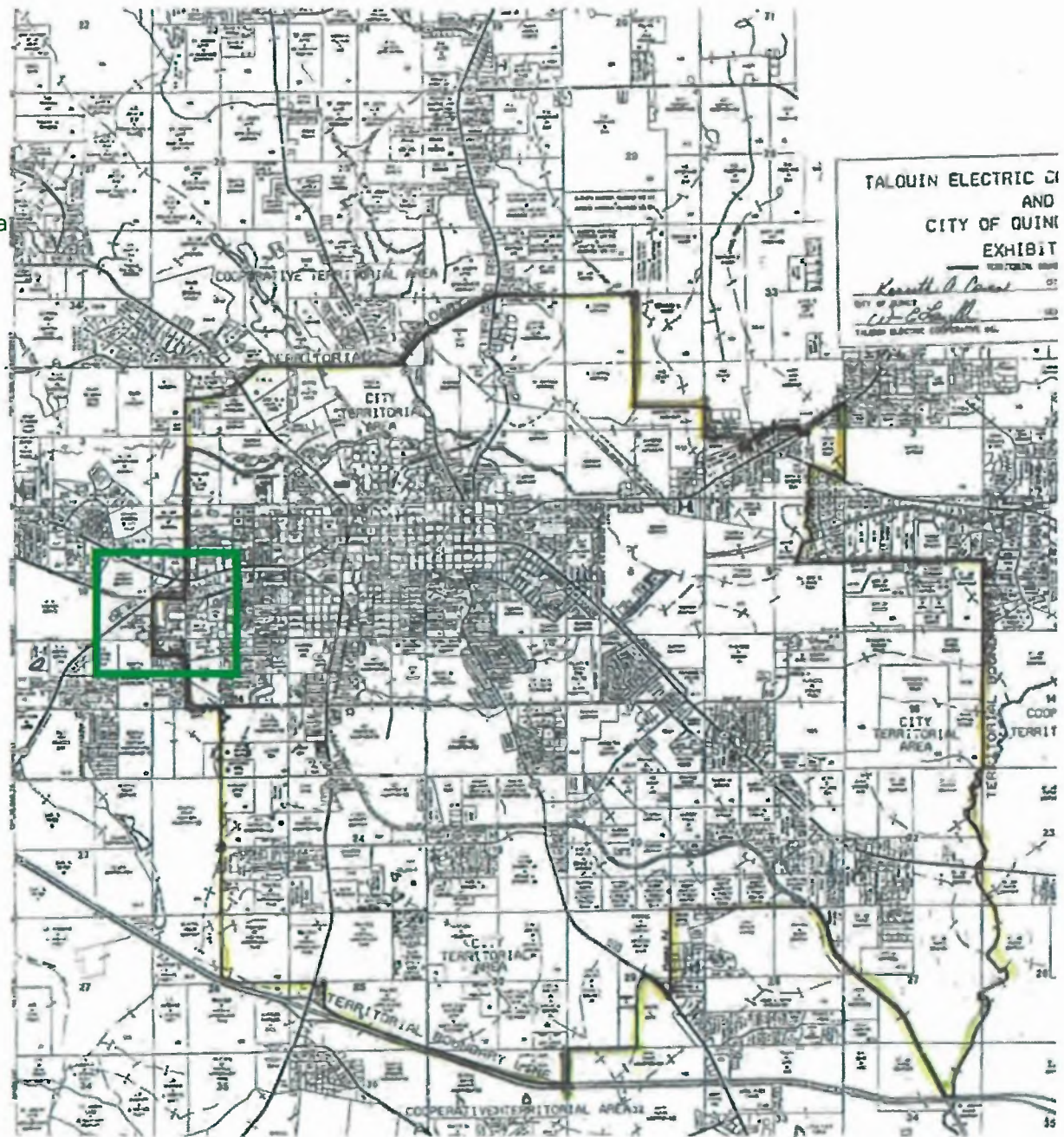


EXHIBIT B

To the Quincy Response to the PSC's Third Data Request

Map Including Territory Annexed by Quincy in February 2025

- 1995 Territorial Agreement Boundary
- Territory Annexed by Quincy February 2025

- Existing 12.47Kv Primary Distribution Lines
- Existing Residential Connections

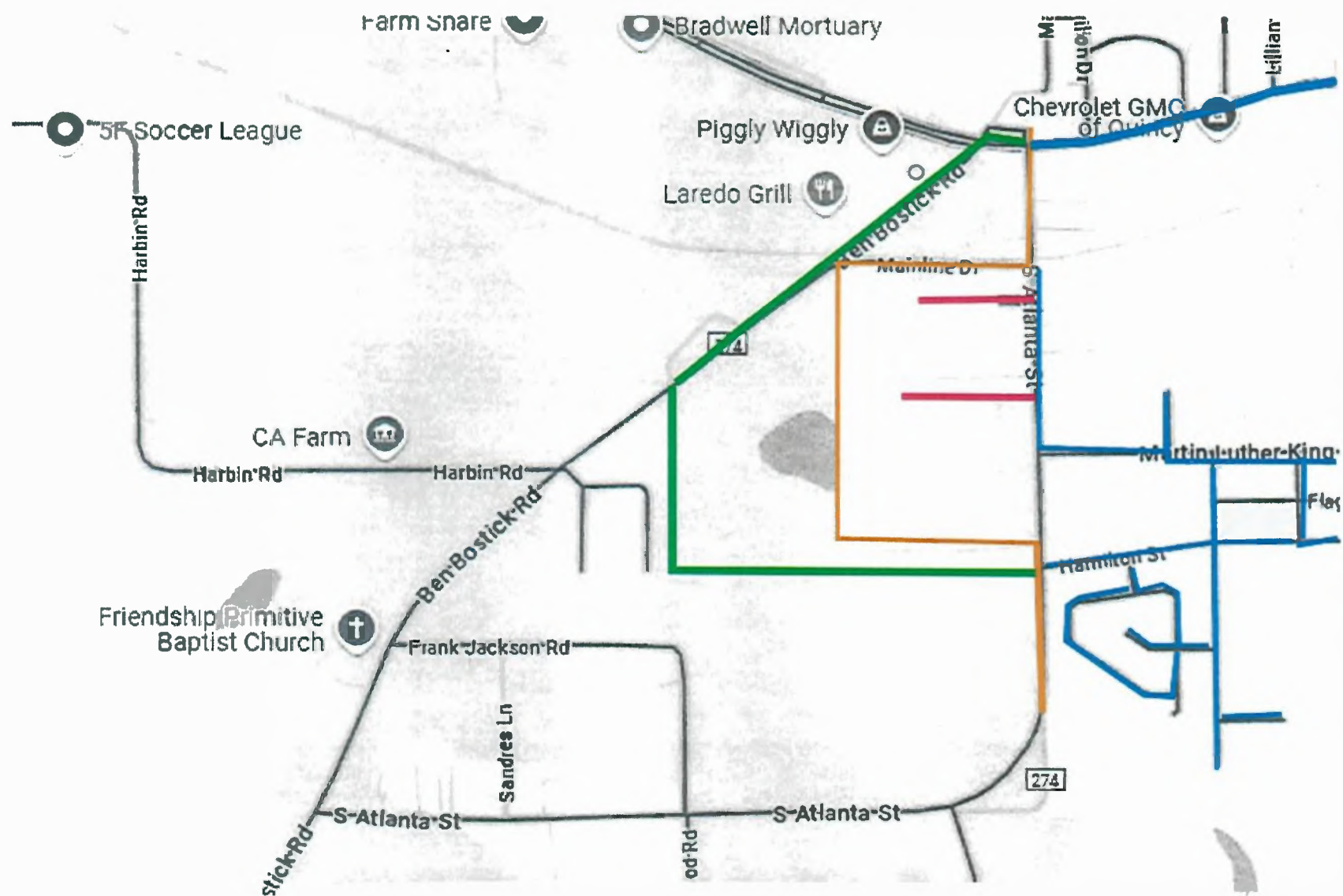


EXHIBIT C

To the Quincy Response to the PSC's Third Data Request

Map Including Proposed Distribution Line Extension

- 1995 Territorial Agreement Boundary
- Territory Annexed by Quincy February 2025

- Existing 12.47Kv Primary Distribution Lines
- Existing Residential Connections
- Proposed Primary Distribution Extension

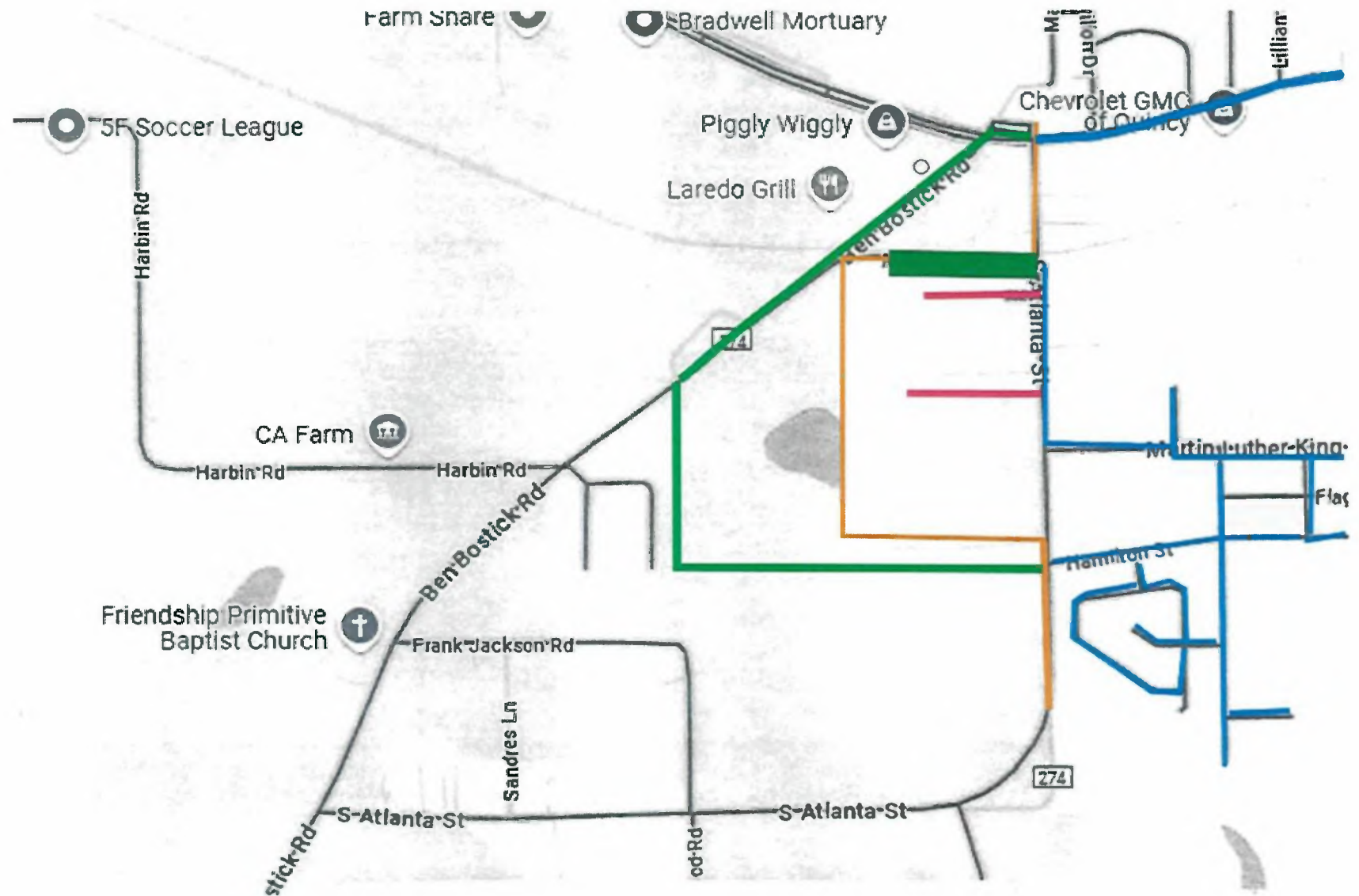


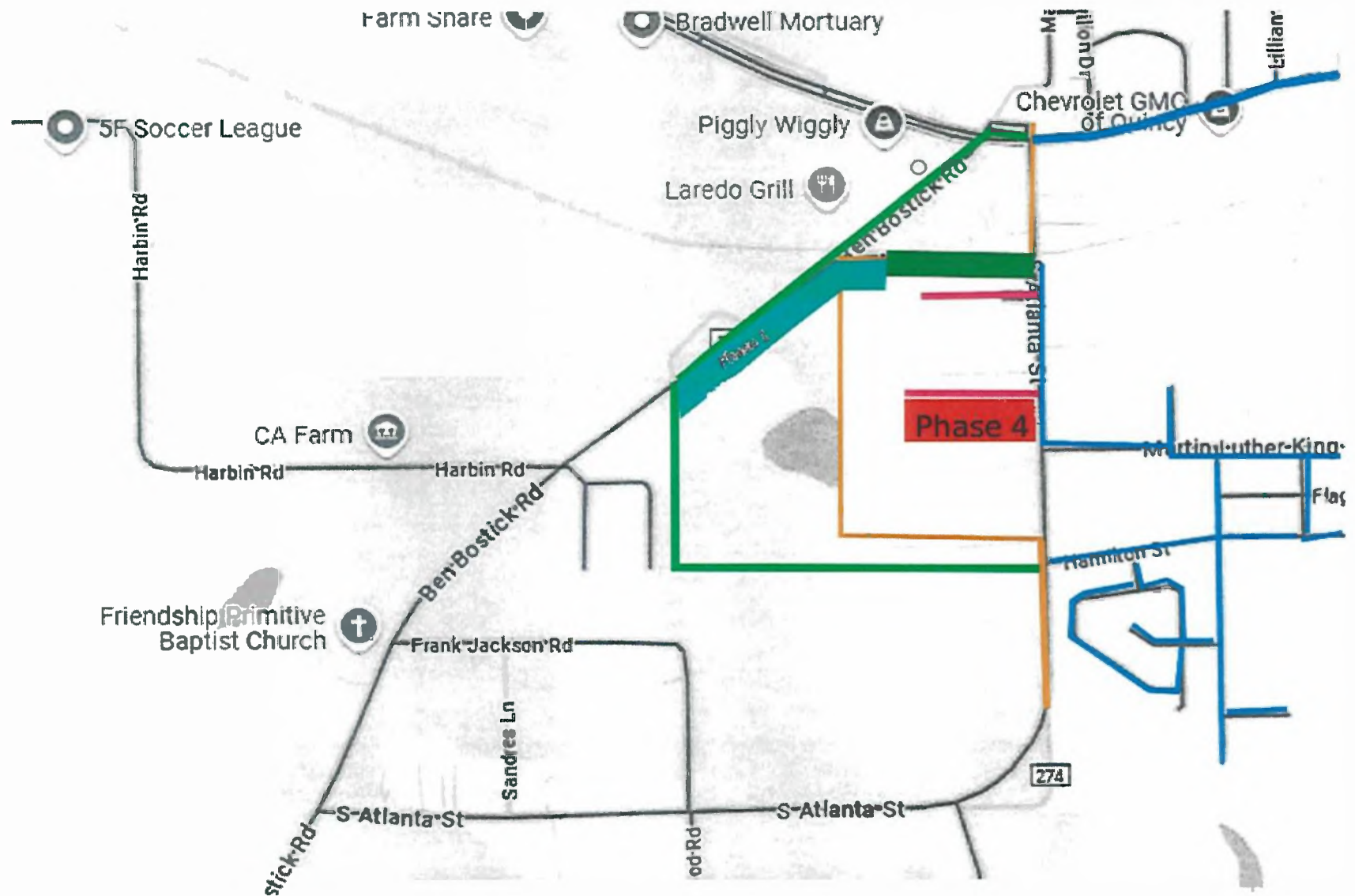
EXHIBIT D

To the Quincy Response to the PSC's Third Data Request

Maps Including Planned Development Phases

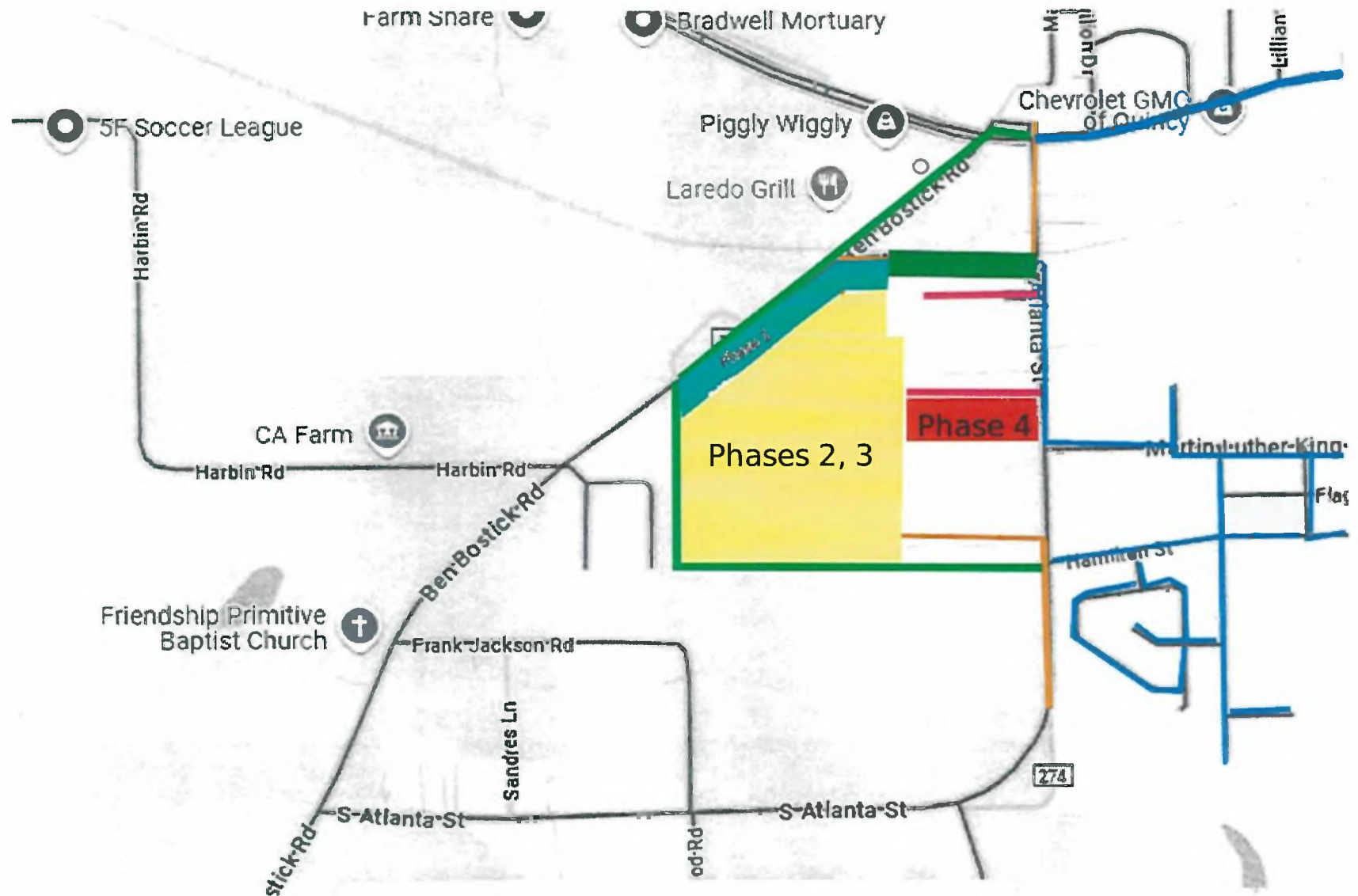
- 1995 Territorial Agreement Boundary
- Territory Annexed by Quincy February 2025
- Phase 1
- Phase 4

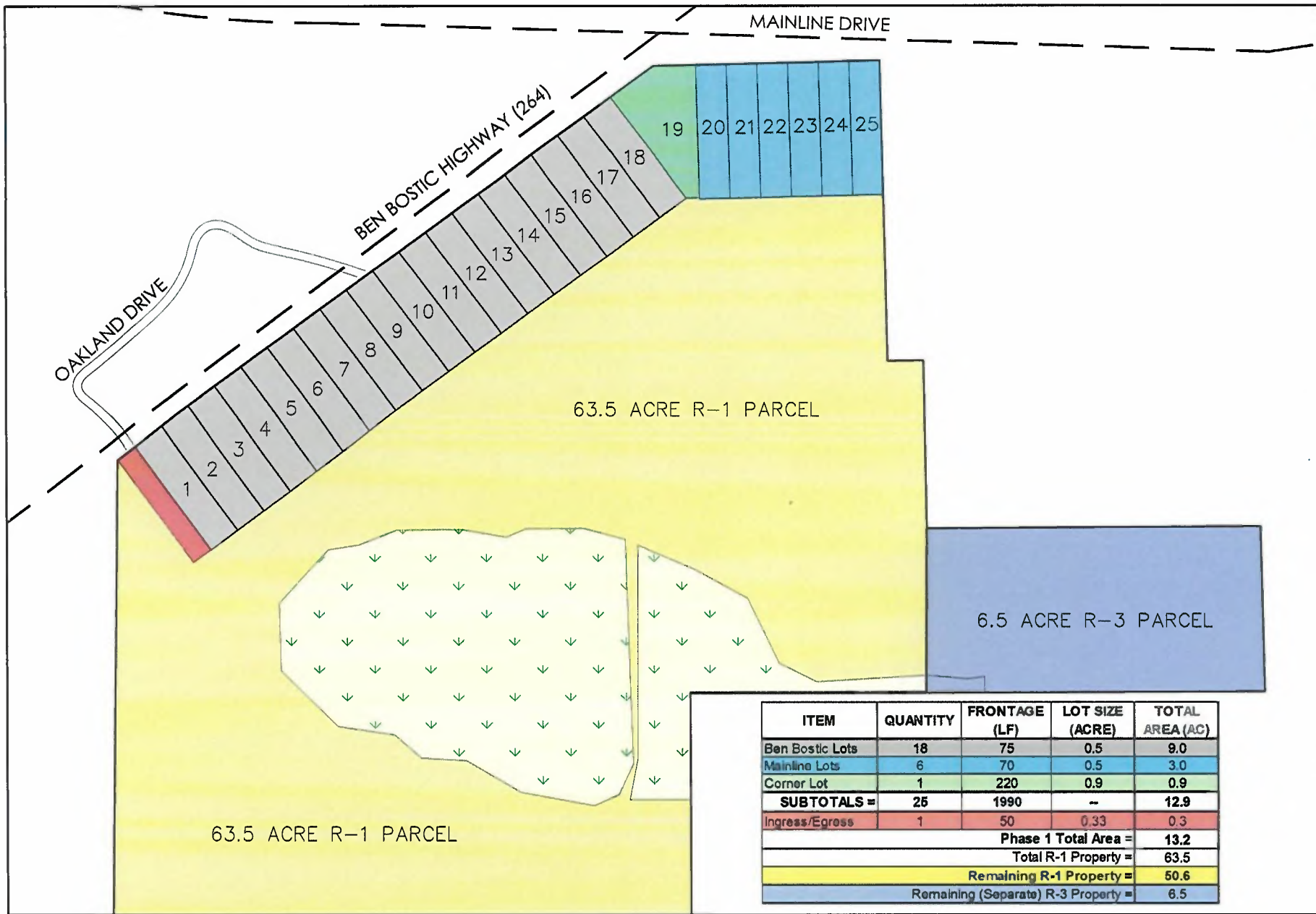
- Existing 12.47Kv Primary Distribution Lines
- Existing Residential Connections
- Proposed Primary Distribution Extension



- 1995 Territorial Agreement Boundary
- Territory Annexed by Quincy February 2025
- Phase 1
- Phase 4

- Existing 12.47Kv Primary Distribution Lines
- Existing Residential Connections
- Proposed Primary Distribution Extension





3020 North Federal Highway,
Unit 10
Ft. Lauderdale, FL 33308
P: 954.406.5388

PROJECT TITLE:
IMPERIAL GARDENS
PHASE 1 LOT LAYOUT
QUINCY, FL
SHEET TITLE:
HALF-ACRE LOT LAYOUTS

DATE	REVISION
11/28/24	ANNEXATION

ISSUED FOR:
REVIEW

DATE:	01/13/25	
PROJ. NO.	23-006	

SCALE 1" = 200' (AT 11x17")

DESIGNED BY: BOP
DRAWN BY: BOP
REVIEWED BY:

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