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September 21, 2021

Via E-Mail

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

> Re: In re: Joint petition for approval of territorial agreement in Calhoun, Jackson, and Washington Counties between Gulf Coast Electric Cooperative, Inc. and West Florida Electric Cooperative Association, Inc., Docket 20210131-EU

Dear Mr. Teitzman:

Gulf Coast Electric Cooperative, Inc. ("GCEC") and West Florida Electric Cooperative Association, Inc. ("WFECA") jointly submit their responses to Staff's Second Data Requests dated September 17, 2021 ("2nd Data Requests"). For ease of reference, the Data Requests are repeated verbatim herein, with the response immediately following each item.

1. Please confirm if any electric facilities, will be transferred from WFECA to GCEC. If so, please state the associated transfer costs.

Response: As indicated in Section 3.1 of the Territorial Agreement, there will be no electric facilities transferred from WFECA to GCEC.

2. Referring to response 5 in staff's first data request, GCEC projects that it will serve approximately 5,383 member-customers in Calhoun, Jackson, and Washington counties. Please discuss if GCEC currently has the capacity and ability to reliably serve the future additional customers without negatively impacting GCEC's existing customer base.

Response: GCEC can confirm that it has the capacity and the ability to serve its future additional customers in its service area under the Territorial Agreement without negatively impacting its existing customer base. In fact, the Territorial Agreement will actually strengthen service reliability for GCEC by eliminating uneconomic and dangerous duplication of facilities.

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3. Please confirm if any electric facilities, will be transferred from GCEC to WFECA. If so, please state the associated transfer costs.

Response: As indicated in Section 3.1 of the Territorial Agreement, there will be no electric facilities transferred from GCEC to WFECA.

4. Referring to response 6 in staff's first data request, WFECA projects that it will serve approximately 18,370 member-customers in Calhoun, Jackson, and Washington counties. Please discuss if WFECA currently has the capacity and ability to reliably serve the future additional customers without negatively impacting WFECA's existing customer base.

Response: WFECA can confirm that it has the capacity and the ability to serve its future additional customers in its service area under the Territorial Agreement without negatively impacting its existing customer base. In fact, the Territorial Agreement will actually strengthen service reliability for WFECA by eliminating uneconomic and dangerous duplication of facilities.

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Should you have any questions regarding the foregoing, please do not hesitate to contact Frank Bondurant or me. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP

D. Bruce May, Jr.

DBM:kjg

cc: Sevini Guffey (via email) Jennifer Crawford, Esq. (via email) Ryan Sandy, Esq. (via email) Ty Peel (via email) John Bartley (via email) Frank Bondurant, Esq. (via email)