

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Territorial Dispute Between)
Talquin Electric Cooperative, Inc. and)
the City of Quincy)
_____)

DOCKET NO. 20250039

FILED: July 22, 2025

**JOINT MOTION FOR EXTENSION OF
DIRECT TESTIMONY FILING DEADLINE**

Talquin Electric Cooperative, Inc. (“Talquin”) and the City of Quincy (“Quincy”) (collectively “the Parties”) file this Joint Motion for Extension of Direct Testimony Filing Deadline and state:

1. On July 8, 2025, the Florida Public Service Commission (“Commission”) entered an Order Establishing Procedure in the above captioned docket. *See* Order No. PSC-2025-0262-PCO-EU. Through that Order, the Commission set a deadline of July 30, 2025 for the Parties to file direct testimony and exhibits.

2. Since that time, the Parties have engaged in productive discussions regarding an amended and restated territorial agreement that would define the service boundary between the two utilities.

3. If representatives for the Parties are able to agree on an amended territorial agreement, the draft agreement would still need to be approved by Talquin’s Board of Trustees and Quincy’s City Commission before the parties could submit the agreement to the Commission for review. The next meetings at which the Talquin Board of Trustees and the Quincy City Commission could review and vote on a draft territorial agreement are not until August.

4. The Parties hereby jointly request a 30-day extension of the deadline to file direct testimony and exhibits until August 29, 2025. This extension would allow the Parties to focus their efforts on negotiations and potentially allow them to finalize a draft territorial agreement and

submit it to the Talquin Board of Trustees and Quincy City Commission for approval at their next meetings in August.

5. Granting this Joint Motion would promote judicial efficiency by granting the parties an opportunity to resolve this territorial dispute without the need for further litigation.

WHEREFORE, Talquin Electric Cooperative, Inc. and the City of Quincy respectfully request that the Commission grant a 30-day extension of the deadline for filing direct testimony and exhibits to August 29, 2025.

DATED this 22nd day of July, 2025.

Respectfully submitted,

/s/ Malcolm N. Means

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ATTORNEY FOR CITY OF QUINCY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Joint Motion for Extension of Direct Testimony filing Deadline, has been furnished by electronic mail on this on this 22nd day of July, 2025 to the following:

Suzanne Brownless
Office of the General Counsel
Florida Public Service Commission
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A handwritten signature in blue ink, appearing to read "Michael N. Meers".

ATTORNEY