

# Holland & Knight

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Holland & Knight LLP | www.hklaw.com

D. Bruce May  
+1 850-425-5607  
bruce.may@hklaw.com

March 20, 2026

*Via Hand Delivery*

Adam Teitzman, Director  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Joint petition for approval of territorial agreement in Hernando, Citrus, Pasco, and Sumter Counties, by Withlacoochee River Electric Cooperative, Inc. and Sumter Electric Cooperative, Inc.; Docket No. 20250128-EU

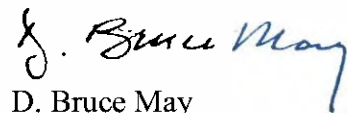
Dear Mr. Teitzman:

After filing the referenced Joint Petition on October 20, 2025, and conferring with Commission staff, it has come to the attention of Sumter Electric Cooperative, Inc. and Withlacoochee River Electric Cooperative, Inc. (“Joint Petitioners”) that there are certain discrepancies in Composite Exhibit “A” and Exhibit “B” to the Joint Petition, which delineate the service area boundaries under the territorial agreement. To correct those discrepancies and avoid confusion, Joint Petitioners are hereby submitting updated maps and territorial descriptions (Updated Composite Exhibit “A” and Updated Exhibit “B”), which should replace in their entirety the earlier versions of Composite Exhibit “A” and Exhibit “B” filed on October 20, 2025.

Please let me know if you have any questions and thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP



D. Bruce May

DBM:jg

Adam Teitzman  
March 20, 2026  
Page 2

Enclosures

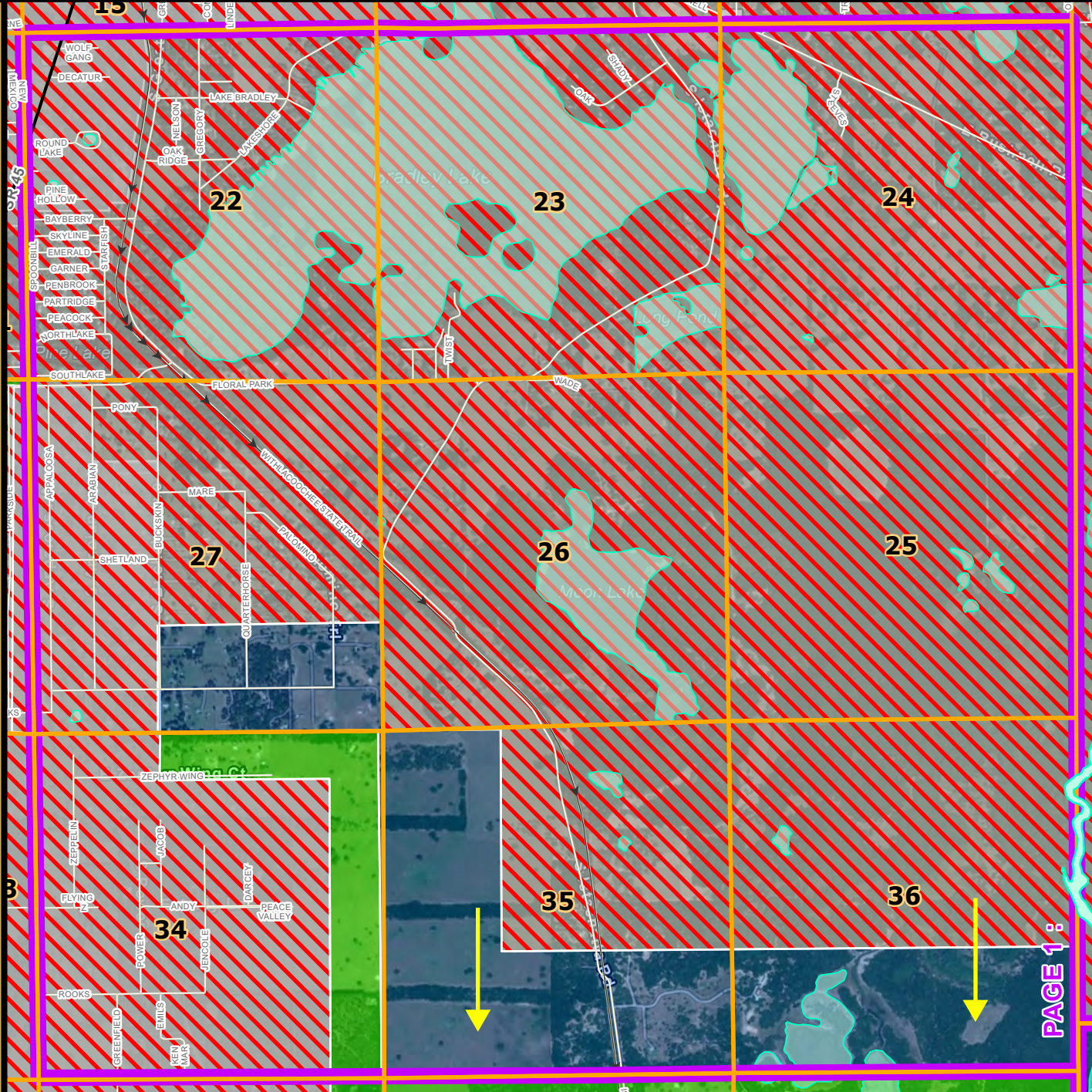
cc: Major Thompson, Esq.  
Mr. Robert Clark  
Mr. Michael Barrett  
Mr. Heriberto Hernandez  
Mr. James Duncan  
Mr. David Lambert  
Keith C. Smith, Esq.  
Tracy de Lemos, Esq.

**UPDATED  
COMPOSITE EXHIBIT A**

Not part of the map book

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Not part of the map book

**EXHIBIT "A":**  
**PAGE 1 :**  
 CITRUS COUNTY, FL  
 SE QUARTER  
 TOWNSHIP = 20  
 RANGE = 20


Map Legend

Territorial Agreement Service Area:

-  SECO Energy (SECO)
-  Withlacoochee Electric (WREC)
-  Excluded from Agreement
-  Map Book Page Quarter Grid Boundary
-  Section
-  County
-  River
-  Lake
-  Railroad
-  Street
-  State Roads

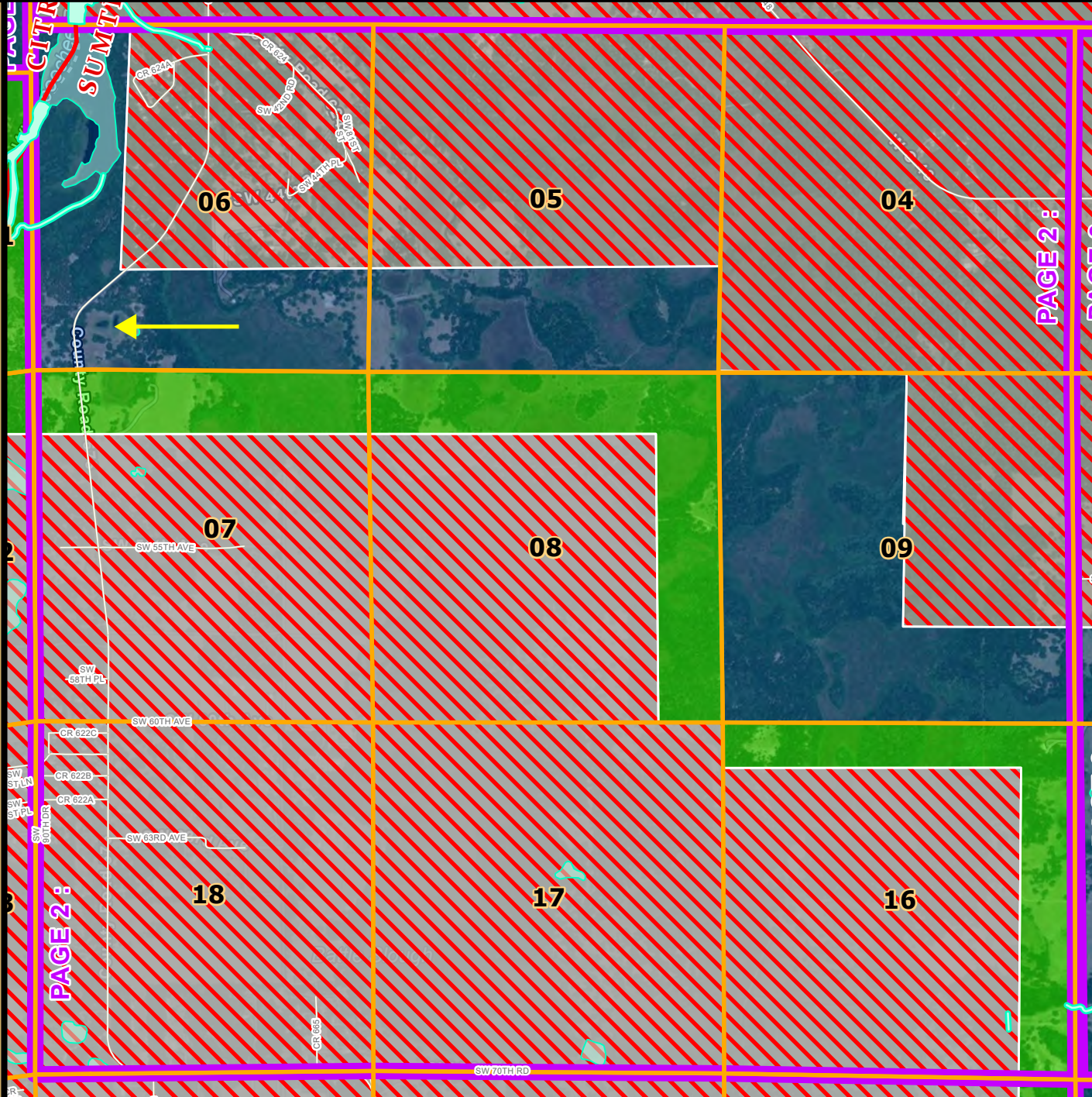


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# EXHIBIT "A":

## PAGE 2 :

SUMTER COUNTY, FL

NW QUARTER

TOWNSHIP = 21

RANGE = 21

### Map Legend

#### Territorial Agreement Service Area:

-  SECO Energy (SECO)
-  Withlacoochee Electric (WREC)
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-  River
-  Lake
-  Railroad
-  Street
-  State Roads



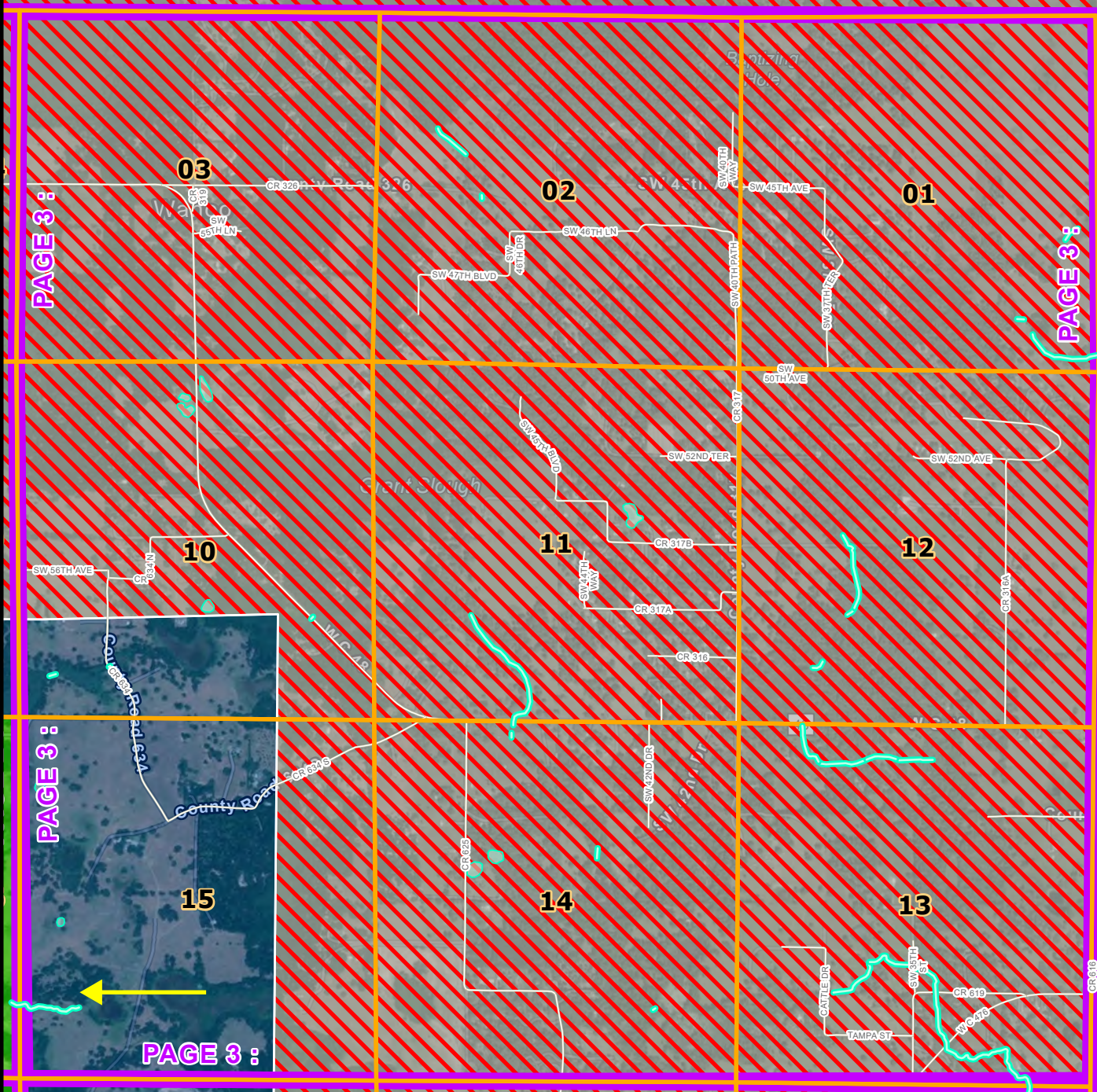
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PAGE 2 : PAGE 3 : NE QUARTER, TWN = 21, RNG = 21

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PAGE 2 : NW QUARTER, TWN = 21, RNG = 21



# EXHIBIT "A":

## PAGE 3 :

SUMTER COUNTY, FL

NE QUARTER

TOWNSHIP = 21

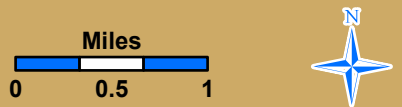
RANGE = 21

### Map Legend


#### Territorial Agreement Service Area:

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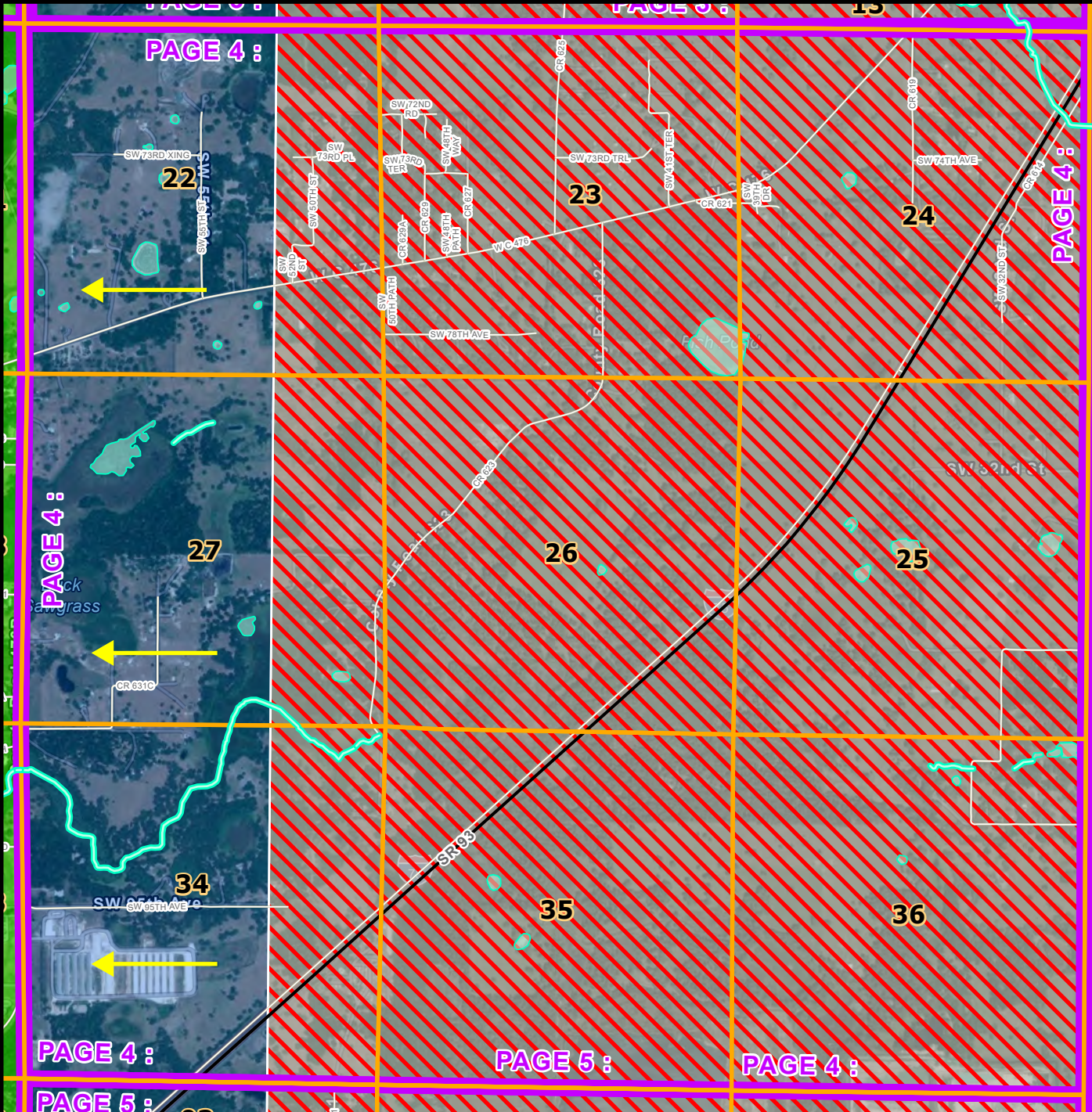
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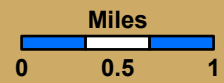
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**Map Legend**

**Territorial Agreement Service Area:**

-  SECO Energy (SECO)
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-  Map Book Page Quarter Grid Boundary
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-  Lake
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-  Street
-  State Roads



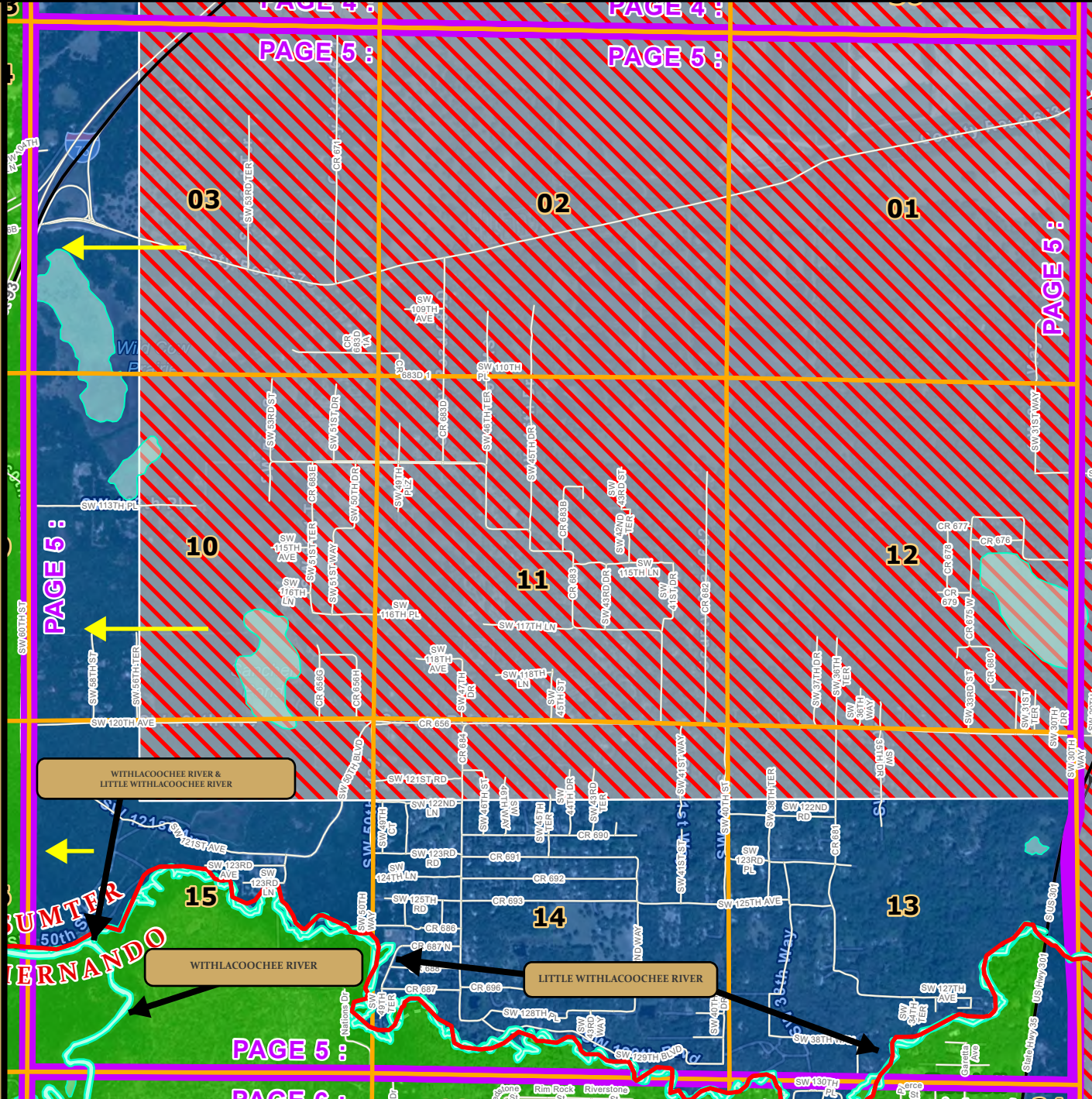
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**EXHIBIT "A":**  
**PAGE 5:**  
 SUMTER COUNTY, FL  
 NE QUARTER  
 TOWNSHIP = 22  
 RANGE = 21

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Map Legend

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-  SECO Energy (SECO)
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-  Map Book Page Quarter Grid Boundary
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-  County
-  River
-  Lake
-  Railroad
-  Street
-  State Roads

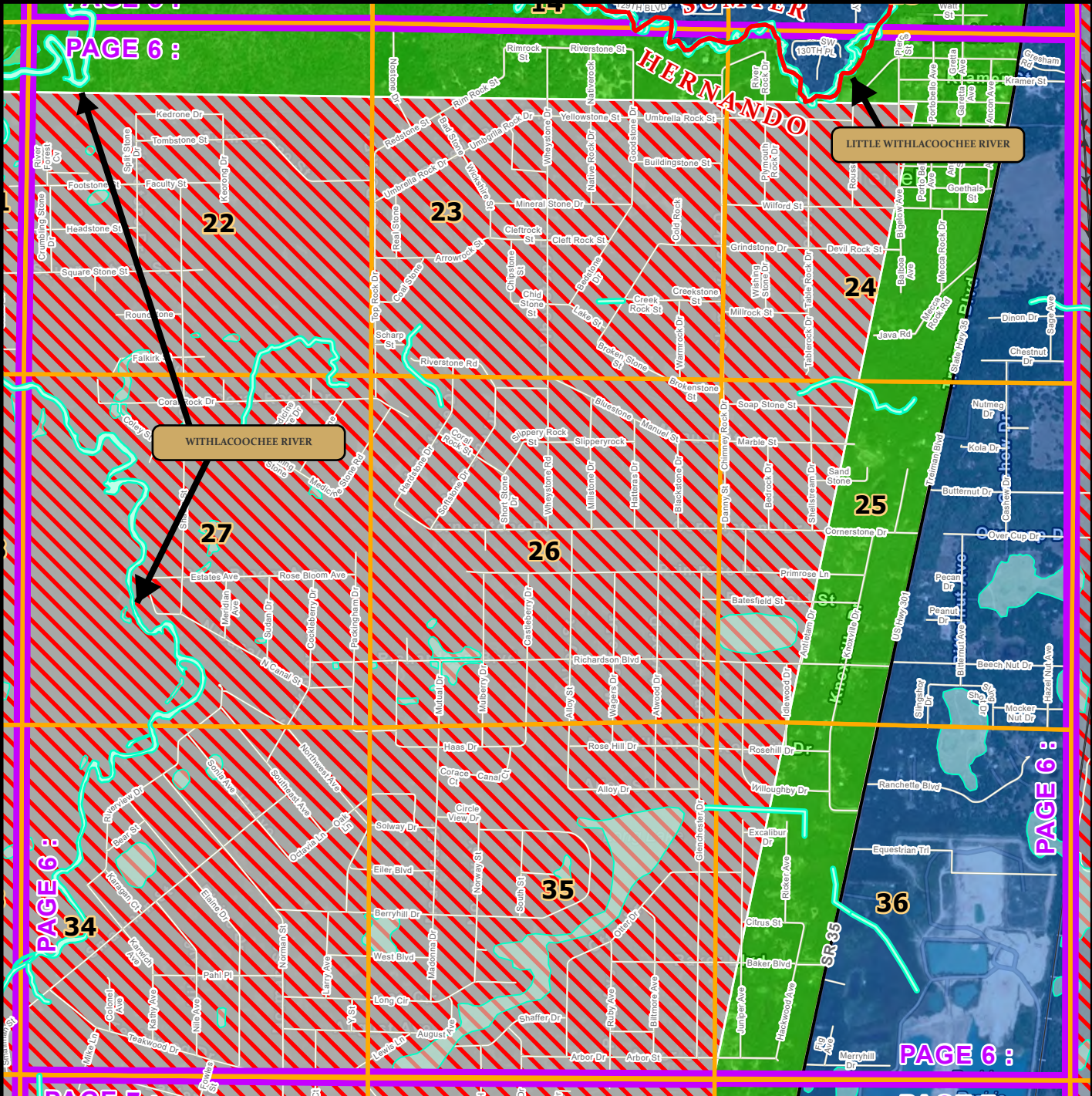


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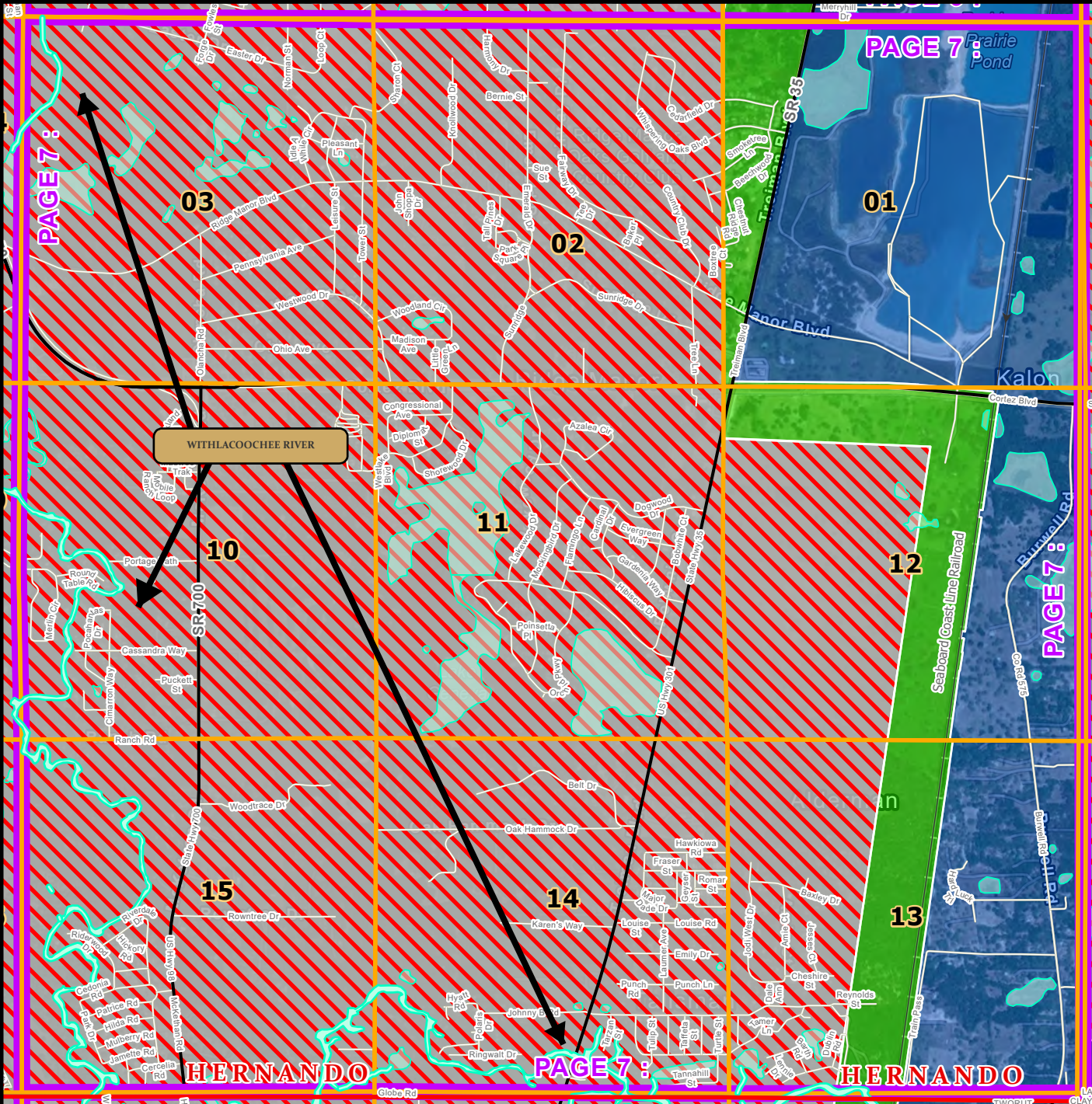


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Not part of the map book



Map Legend

Territorial Agreement Service Area:

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-  Withlacoochee Electric (WREC)
-  Excluded from Agreement

Map Book Page Quarter Grid Boundary

 Section


 County

 River

 Lake

 Railroad

 Street

 State Roads

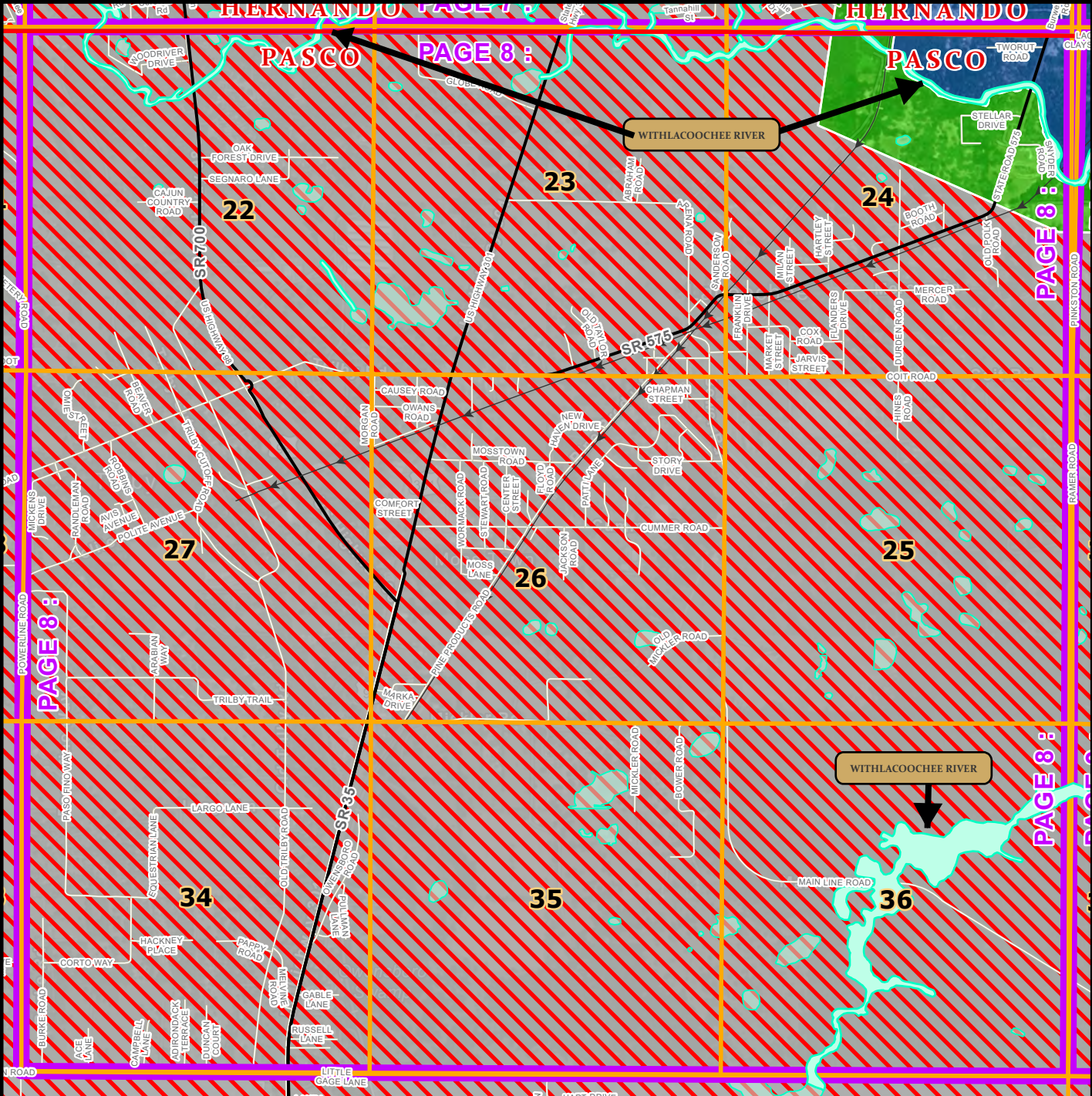


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**EXHIBIT "A":**  
**PAGE 8 :**  
 PASCO COUNTY, FL  
 SE QUARTER  
 TOWNSHIP = 23  
 RANGE = 21

Not part of the map book



PAGE 9 : SW QUARTER, TWN = 23, RNG = 22

**Map Legend**

**Territorial Agreement Service Area:**

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HERNANDO

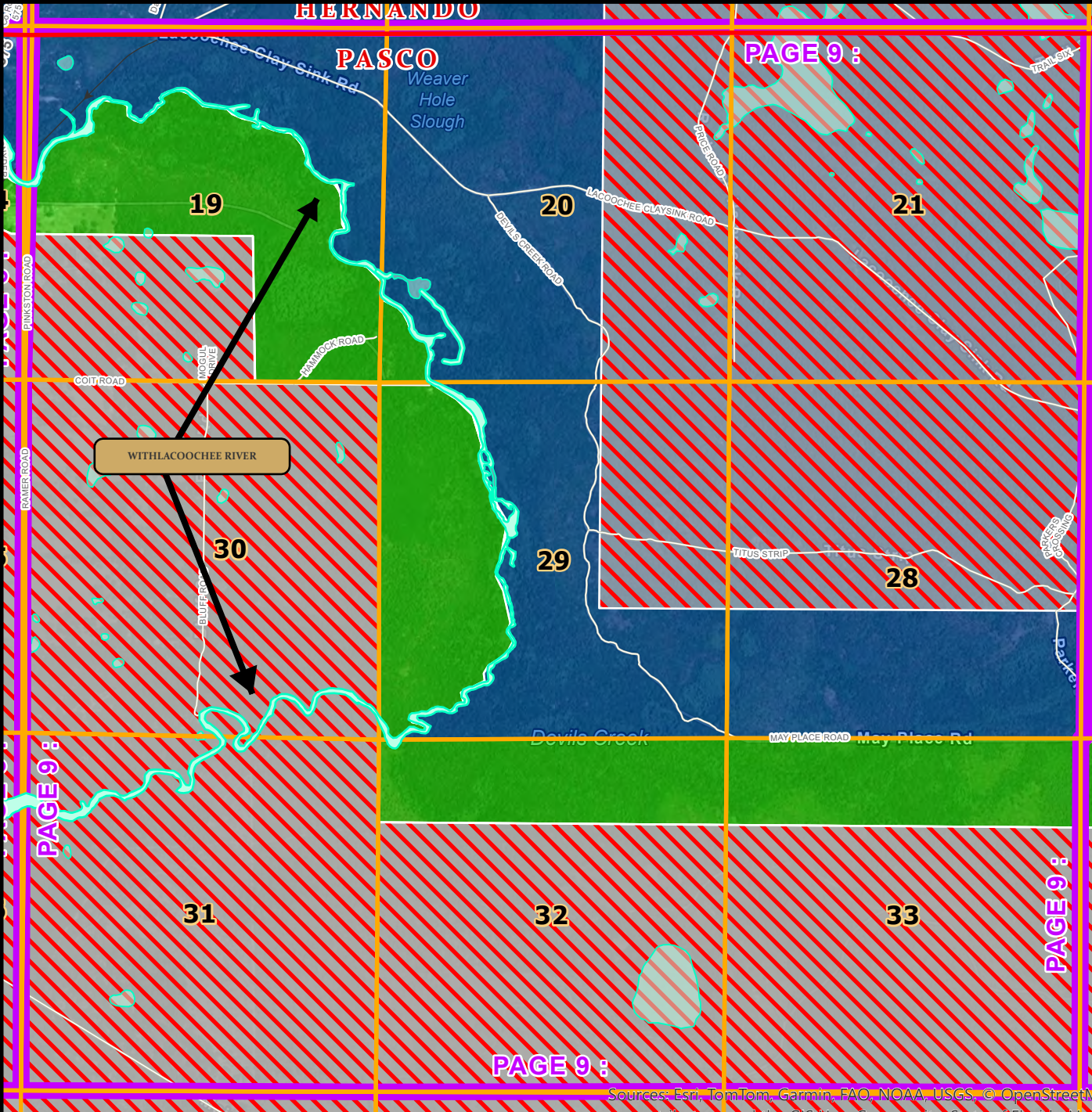
PASCO

Weaver Hole Slough

PAGE 9 :

PAGE 14 : SE QUARTER, TWN = 23, RNG = 21

PAGE 10 : SE QUARTER, TWN = 23, RNG = 22



# EXHIBIT "A":

## PAGE 9 :

PASCO COUNTY, FL

SW QUARTER

TOWNSHIP = 23

RANGE = 22

### Map Legend

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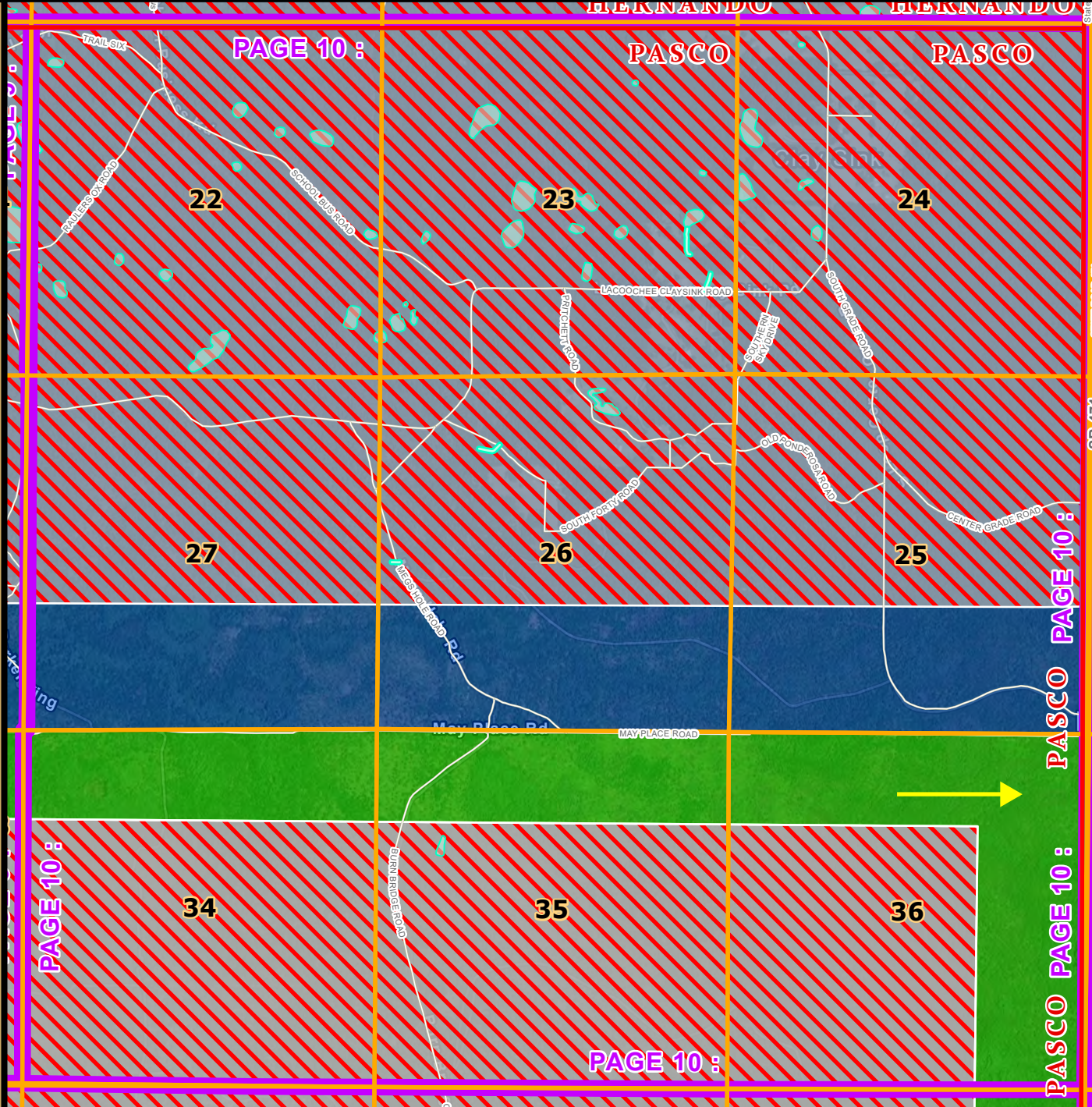


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Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap

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PAGE 9 : SW QUARTER, TWN = 23, RNG = 22



PAGE 11 : SW QUARTER, TWN = 23, RNG = 23

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**EXHIBIT "A":**  
**PAGE 10:**  
 PASCO COUNTY, FL  
 SE QUARTER  
 TOWNSHIP = 23  
 RANGE = 22


Map Legend

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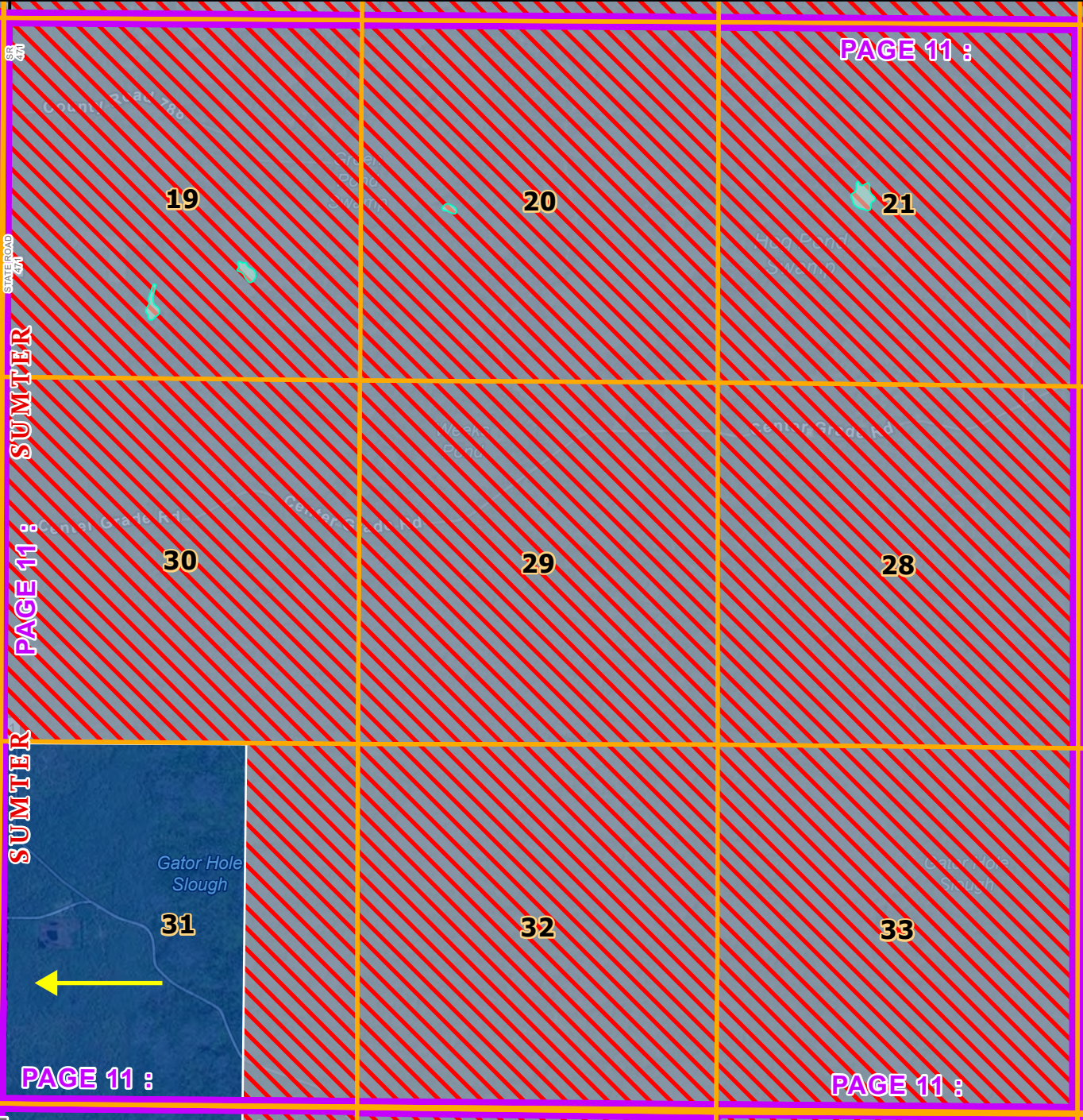


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PAGE 10 : SE QUARTER, TWN = 23, RNG = 22



**EXHIBIT "A":**  
**PAGE 11 :**  
 SUMTER COUNTY, FL  
 SW QUARTER  
 TOWNSHIP = 23  
 RANGE = 23

Not part of the map book

Map Legend

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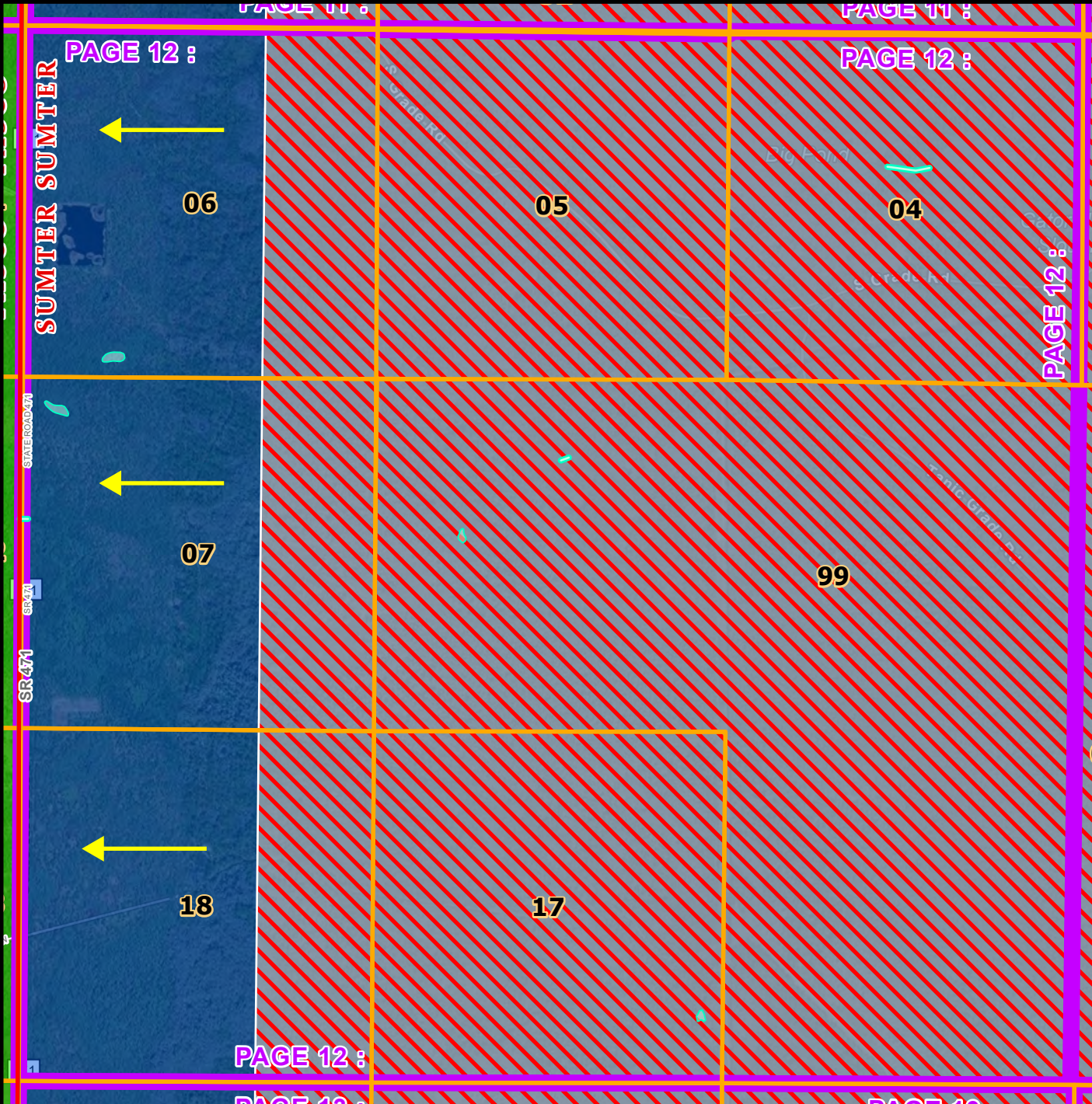


PAGE 12 : NW QUARTER, TWN = 24, RNG = 23

**EXHIBIT "A":**  
**PAGE 12:**  
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 NW QUARTER  
 TOWNSHIP = 24  
 RANGE = 23

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Map Legend

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PAGE 13 :

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PAGE 13 :

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# EXHIBIT "A":

## PAGE 13:

SUMTER COUNTY, FL

SW QUARTER

TOWNSHIP = 24

RANGE = 23

### Map Legend

#### Territorial Agreement Service Area:

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PAGE 14 : SE QUARTER, TWN = 24, RNG = 23

SUMTER

SUMTER

SR 471

Withlacoochee Grade Rd

Devils Creek Swamp

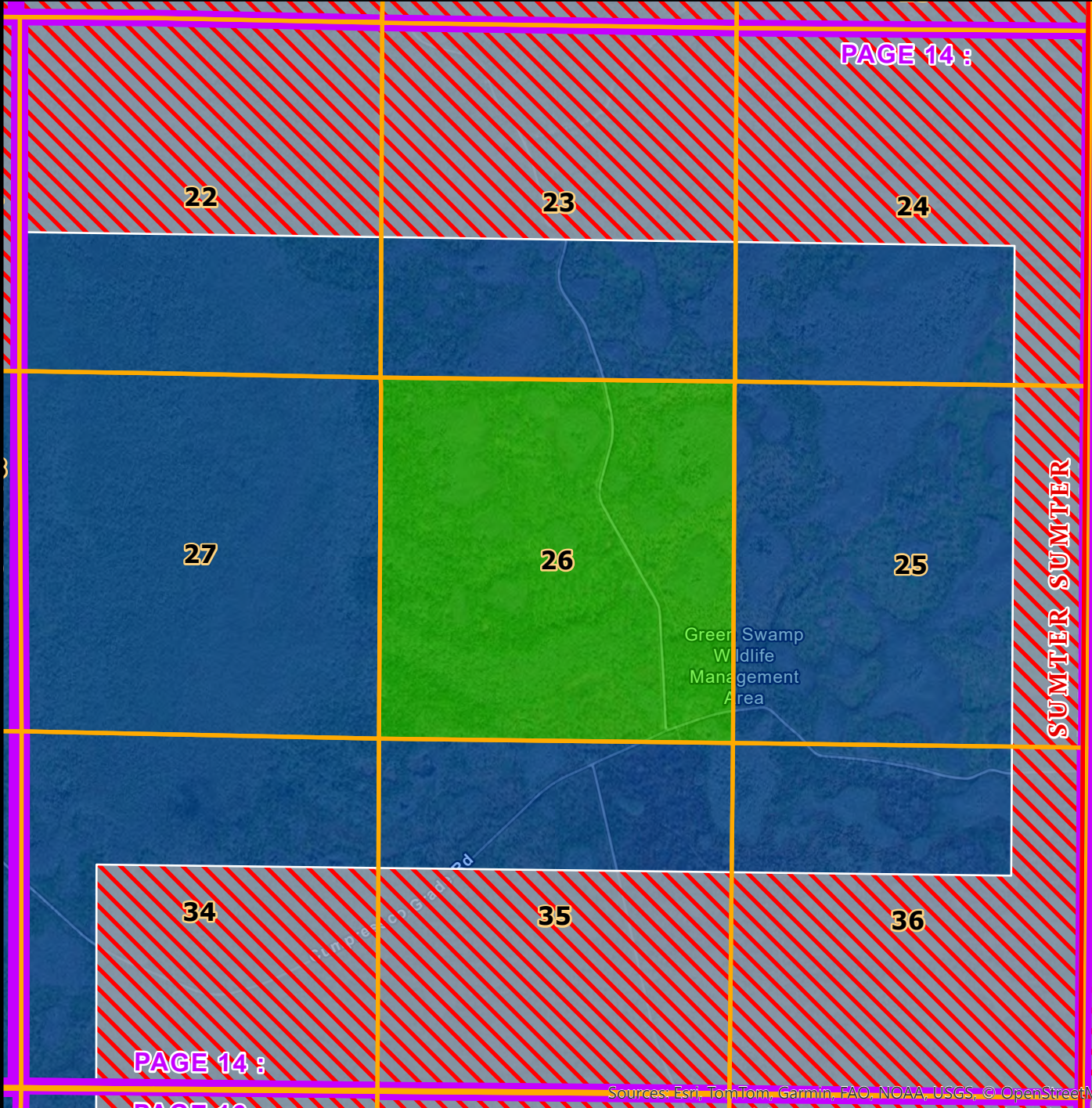
Cumpresso Grade Rd

PAGE 13 :

PAGE 15 :

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PAGE 13 : SW QUARTER, TWN = 24, RNG = 23



PAGE 14 :

PAGE 14 :

PAGE 14 :

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# EXHIBIT "A":

## PAGE 14 :

SUMTER COUNTY, FL










SE QUARTER

TOWNSHIP = 24

RANGE = 23

### Map Legend

#### Territorial Agreement Service Area:

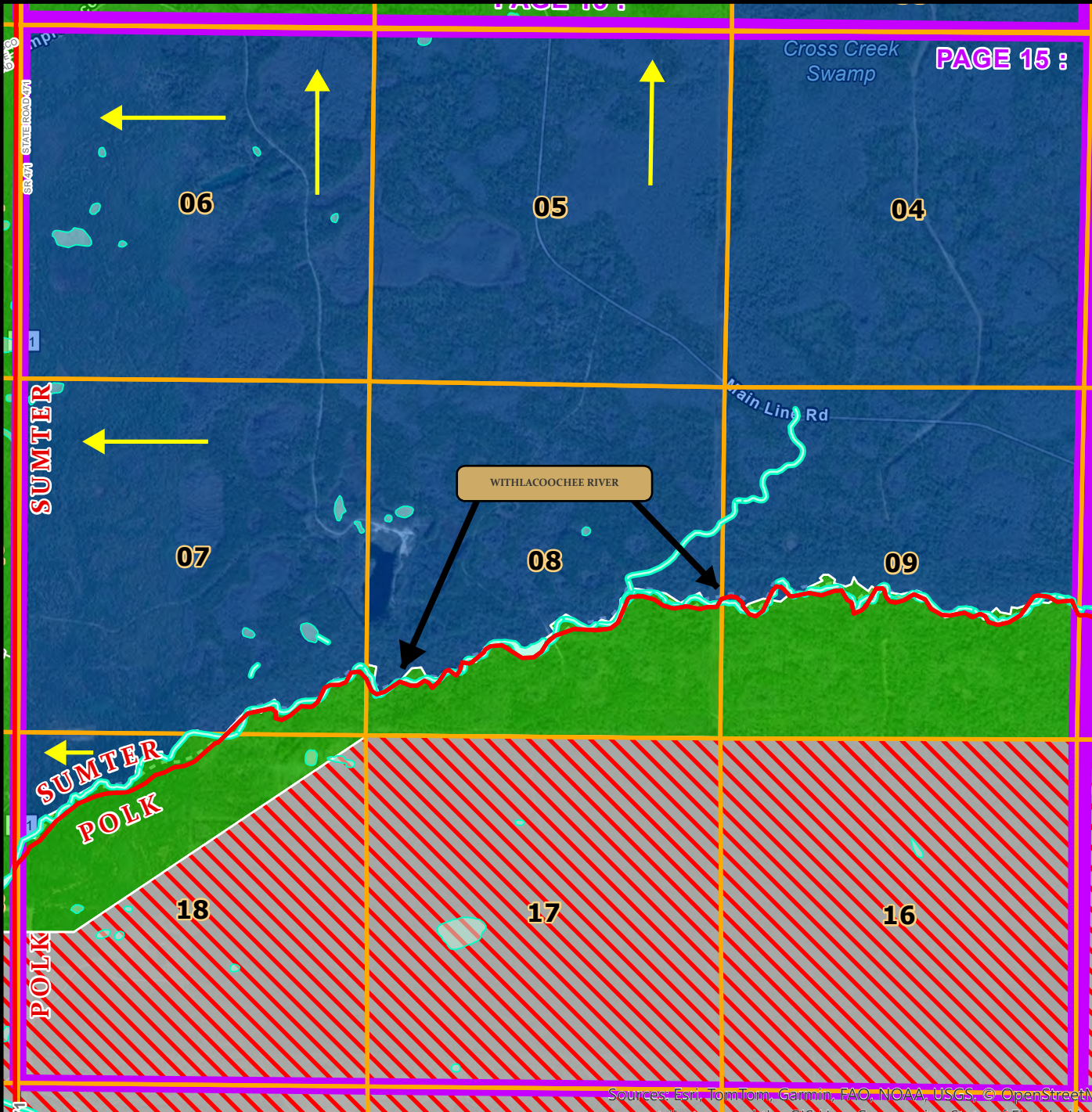
-  SECO Energy (SECO)
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PAGE 16 : NE QUARTER, TWN = 25, RNG = 23

Map Legend

Territorial Agreement Service Area:

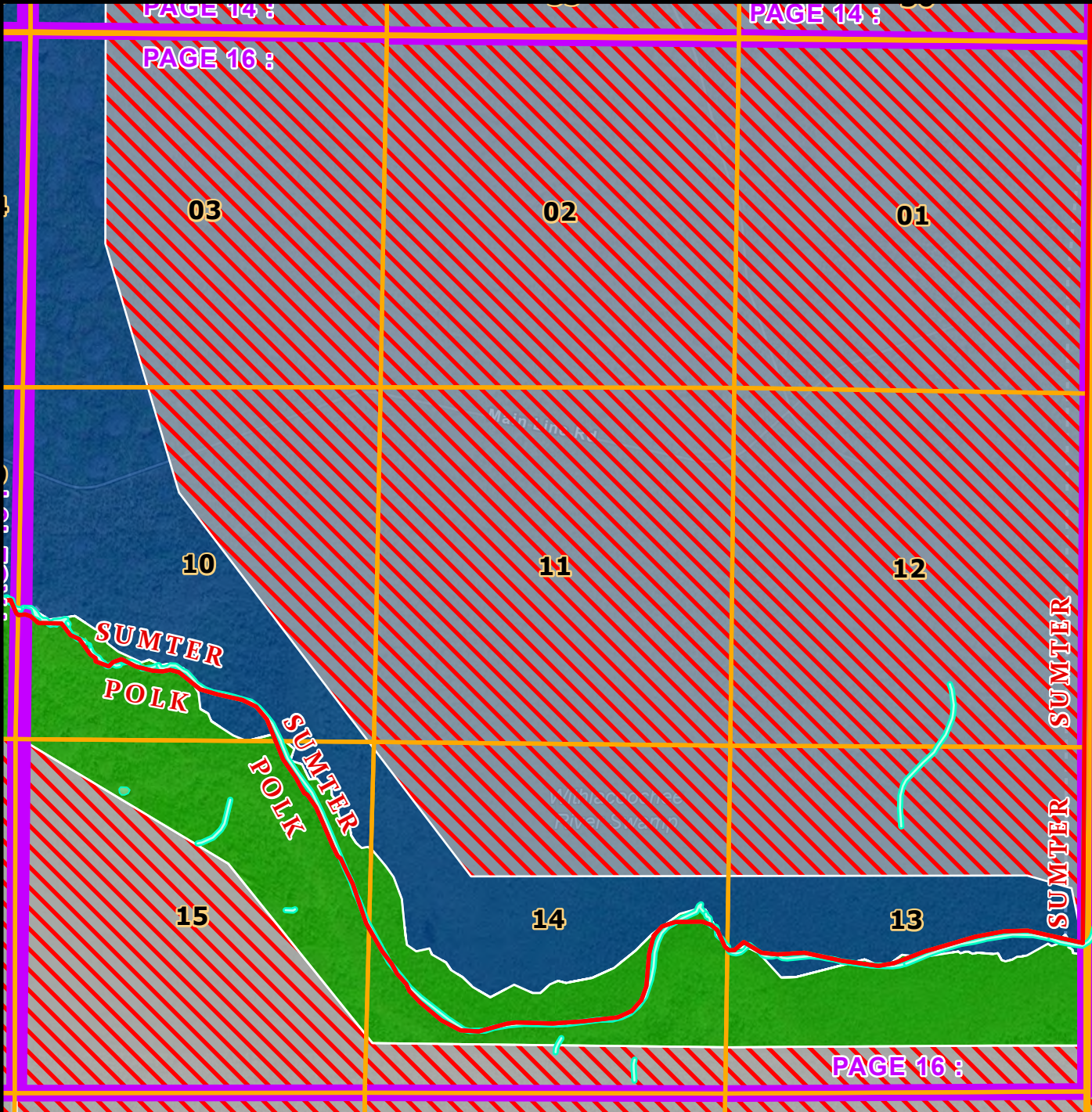
-  SECO Energy (SECO)
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**EXHIBIT "A":**  
**PAGE 16:**  
 SUMTER COUNTY, FL  
 NE QUARTER  
 TOWNSHIP = 25  
 RANGE = 23



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Not part of the map book

Map Legend

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**UPDATED  
EXHIBIT B**

**Written Description of the Territorial Boundary Lines \***

**EXHIBIT B**

EXHIBIT A Map Page	Quarter	Township, Range	Section(s)	Description/Notes
1	SE	T20, R20	34	WREC & SECO’s jurisdictional boundary runs west for an estimated 3,300 feet beginning on the northeast corner of section 34 and the east section line of section 37. Any remaining portions of the referenced sections are excluded from this Agreement <sup>1</sup> .
1	SE	T20, R20	35	WREC & SECO’s jurisdictional boundary falls on the south and west section lines of section 35. Any remaining portions of the referenced sections are excluded from this Agreement.
1	SE	T20, R20	36	WREC & SECO’s jurisdictional boundary falls on the south section lines of section 36. Any remaining portions of the referenced sections are excluded from this Agreement.
2	NW	T20, R20	05	WREC & SECO’s jurisdictional boundary falls on the south section lines of section 05. Any remaining portions of the referenced sections are excluded from this Agreement.
2	NW	T21, R21	06	WREC & SECO’s jurisdictional boundary runs north for an estimated 4,400 feet beginning on the southwest corner of section 06. In addition, WREC & SECO’s jurisdictional boundary falls on the south section lines of section 06. Any remaining portions of the referenced sections are excluded from this Agreement.
2	NW	T21, R21	07	WREC & SECO’s jurisdictional boundary falls on the north section lines of section 07. Any remaining portions of the referenced sections are excluded from this Agreement.
2	NW	T21, R21	08 & 16	WREC & SECO’s jurisdictional boundary falls north and east section lines of sections 08 & 16. Any remaining portions of the referenced sections are excluded from this Agreement.

<sup>1</sup>. SECO makes no representation or warranty regarding the scope or accuracy of WREC’s service territory, as such determinations remain solely within WREC’s authority. Applies to all references to WREC’s service territory in this section.

\* Territorial areas are described within the Quarter Grid Boundary. If there are any discrepancies between Exhibit A and Exhibit B, the territorial written description in Exhibit B shall prevail.

**Written Description of the Territorial Boundary Lines \***

**EXHIBIT B**

EXHIBIT A Map Page	Quarter	Township, Range	Section(s)	Description/Notes
3	NE	T21, R21	15	WREC & SECO's jurisdictional boundary falls on the west section lines of section 15. Any remaining portions of the referenced sections are excluded from this Agreement.
4	SE	T21, R21	22, 27 & 34	WREC & SECO's jurisdictional boundary falls on the west section lines of sections 22, 27 & 34. Any remaining portions of the referenced sections are excluded from this Agreement.
5	NE	T22, R21	03 & 10	WREC & SECO's jurisdictional boundary falls on the west section lines of section 03 & 10. Any remaining portions of the referenced sections are excluded from this Agreement.
5	NE	T22, R21	13	WREC & SECO's jurisdictional boundary falls on the centerline of the Little Withlacoochee River. In addition, WREC & SECO's jurisdictional boundary falls on of the centerline of U.S. Highway 301. Any remaining portions of the referenced sections are excluded from this Agreement.
5	NE	T22, R21	14	WREC & SECO's jurisdictional boundary falls on the centerline of the Little Withlacoochee River. Any remaining portions of the referenced sections are excluded from this Agreement.
5	NE	T22, R21	15	WREC & SECO's jurisdictional boundary falls on the center of the Little Withlacoochee River. In addition, WREC & SECO's jurisdictional boundary falls on the west section lines of section 15.
6	SE	T22, R21	23	WREC & SECO's jurisdictional boundary falls on the centerline of Little Withlacoochee River. Any remaining portion of the referenced sections are excluded from this agreement.
6	SE	T22, R21	24	WREC & SECO's jurisdictional boundary falls on the centerline of Little Withlacoochee River. In addition, WREC & SECO's jurisdictional boundary falls on the centerline of U.S. Highway 301 Any remaining portion of the referenced sections are excluded from this agreement.

<sup>1</sup>. SECO makes no representation or warranty regarding the scope or accuracy of WREC's service territory, as such determinations remain solely within WREC's authority. Applies to all references to WREC's service territory in this section.

\* Territorial areas are described within the Quarter Grid Boundary. If there are any discrepancies between Exhibit A and Exhibit B, the territorial written description in Exhibit B shall prevail.

## Written Description of the Territorial Boundary Lines \*

### EXHIBIT B

EXHIBIT A Map Page	Quarter	Township, Range	Section(s)	Description/Notes
6	SE	T22, R21	25 & 36	WREC & SECO's jurisdictional boundary falls on the centerline of U.S. Highway 301. Any remaining portion of the referenced sections are excluded from this agreement.
7	NE	T23, R21	1	WREC & SECO's jurisdictional boundary falls on the centerline of U.S. Highway 301 and on the centerline of Cortez Blvd.
7	NE	T23, T21	12	WREC & SECO's jurisdictional boundary falls on the centerline of the Seaboard Coast Line Railroad. In addition, WREC & SECO's jurisdictional boundary falls on the north section lines of section 12. Any remaining portions of the referenced sections are excluded from this Agreement.
7	NE	T23, T21	13	WREC & SECO's jurisdictional boundary falls on the centerline of the Seaboard Coast Line Railroad. Any remaining portion of the referenced sections are excluded from this Agreement.
8	SE	T23, R21	24	WREC & SECO's jurisdictional boundary falls on the centerline of the Little Withlacoochee River. Any remaining portion of the referenced sections are excluded from this Agreement.
9	SW	T23, R22	19	WREC & SECO's jurisdictional boundary falls on the centerline of the Withlacoochee River. Any remaining portion of the referenced sections are excluded from this Agreement.
9	SW	T23, R22	20	WREC & SECO's jurisdictional boundary falls on the centerline of the Withlacoochee River. Any remaining portion of the referenced sections are excluded from this Agreement.
9	SW	T23, R22	28	WREC & SECO's jurisdictional boundary falls on the south section line of section 28. Any remaining portion of the referenced sections are excluded from this Agreement.

<sup>1</sup>. SECO makes no representation or warranty regarding the scope or accuracy of WREC's service territory, as such determinations remain solely within WREC's authority. Applies to all references to WREC's service territory in this section.

\* Territorial areas are described within the Quarter Grid Boundary. If there are any discrepancies between Exhibit A and Exhibit B, the territorial written description in Exhibit B shall prevail.

**Written Description of the Territorial Boundary Lines \***

**EXHIBIT B**

EXHIBIT A Map Page	Quarter	Township, Range	Section(s)	Description/Notes
9	SW	T23, R22	29	WREC & SECO’s jurisdictional boundary falls on the centerline of the Withlacoochee River. WREC & SECO’s jurisdictional boundary falls on the south section lines of section 29. Any remaining portion of the referenced sections are excluded from this Agreement.
9	SW	T23, R22	32 & 33	WREC & SECO’s jurisdictional boundary falls on the north section lines of sections 32 & 33. Any remaining portion of the referenced sections are excluded from this agreement.
10	SE	T23, R22	25, 26 & 27	WREC & SECO’s jurisdictional boundary falls on the south section line of sections 25, 26 & 27. Any remaining portion of the referenced sections are excluded from this Agreement.
10	SE	T23, R22	34 & 35	WREC & SECO’s jurisdictional boundary falls on the north section line of section 34 & 35. Any remaining portion of the referenced sections are excluded from this agreement.
10	SE	T23, R22	36	WREC & SECO’s jurisdictional boundary falls on the north and east section line of section 36. Any remaining portion of the referenced sections are excluded from this agreement.
11	SW	T23, R23	31	WREC & SECO’s jurisdictional boundary falls on the west section line of section 31. Any remaining portion of the referenced sections are excluded from this agreement.
12	NW	T24, R23	06, 07 & 18	WREC & SECO’s jurisdictional boundary falls on the west section line of sections 06, 07 & 18. Any remaining portion of the referenced sections are excluded from this Agreement.

<sup>1</sup>. SECO makes no representation or warranty regarding the scope or accuracy of WREC’s service territory, as such determinations remain solely within WREC’s authority. Applies to all references to WREC’s service territory in this section.

\* Territorial areas are described within the Quarter Grid Boundary. If there are any discrepancies between Exhibit A and Exhibit B, the territorial written description in Exhibit B shall prevail.

**Written Description of the Territorial Boundary Lines \***

**EXHIBIT B**

EXHIBIT A Map Page	Quarter	Township, Range	Section(s)	Description/Notes
13	SW	T24, R23	19	WREC & SECO’s jurisdictional boundary falls on the west and south section line of section 19. Any remaining portion of the referenced sections are excluded from this Agreement.
13	SW	T24, R23	20	WREC & SECO’s jurisdictional boundary falls on the south section line of section 20. Any remaining portion of the referenced sections are excluded from this Agreement.
13	SW	T24, R23	28 & 33	WREC & SECO’s jurisdictional boundary falls on the west section line of sections 28 & 33.
13	SW	T24, R23	29	WREC & SECO’s jurisdictional boundary falls on the north and east section line of section 29. Any remaining portion of the referenced sections are excluded from this agreement
13	SW	T24, R23	30	WREC & SECO’s jurisdictional boundary falls on the north section line of section 30. Any remaining portion of the referenced sections are excluded from this agreement.
13	SW	T24, R23	31	WREC & SECO’s jurisdictional boundary falls on the south section line of section 31. Any remaining portion of the referenced sections are excluded from this agreement.
13	SW	T24, R23	32	WREC & SECO’s jurisdictional boundary falls on the south and east section line of section 32. Any remaining portion of the referenced sections are excluded from this agreement.
14	SE	T24, R23	26	WREC & SECO’s jurisdictional boundary falls on the north, south, east and west of the section lines of section 26. Any remaining portion of the referenced sections are excluded from this Agreement.

<sup>1</sup>. SECO makes no representation or warranty regarding the scope or accuracy of WREC’s service territory, as such determinations remain solely within WREC’s authority. Applies to all references to WREC’s service territory in this section.

\* Territorial areas are described within the Quarter Grid Boundary. If there are any discrepancies between Exhibit A and Exhibit B, the territorial written description in Exhibit B shall prevail.

**Written Description of the Territorial Boundary Lines \***

**EXHIBIT B**

EXHIBIT A Map Page	Quarter	Township, Range	Section(s)	Description/Notes
15	NW	T25, R23	05	WREC & SECO’s jurisdictional boundary falls on the north section line of section 05.
15	NW	T25, T23	06	WREC & SECO’s jurisdictional boundary falls on the north and west section line of section 06.
15	NW	T25, T23	07	WREC & SECO’s jurisdictional boundary falls on the centerline of the Withlacoochee River. In addition, WREC & SECO’s jurisdictional boundary falls on the west section line of section 07.
15	NW	T25, R23	08 & 09	WREC & SECO’s jurisdictional boundary falls on the centerline of the Withlacoochee River.
15	NW	T25, R23	18	WREC & SECO’s jurisdictional boundary falls on the centerline of the Withlacoochee River. In addition, WREC & SECO’s jurisdictional boundary runs south for an estimated 1,600 feet beginning on the northwest corner of section 18. Any remaining portion of the referenced sections are excluded from this agreement.
16	NE	T25, R23	10, 13, 14 & 15	WREC & SECO’s jurisdictional boundary falls on the centerline of the Withlacoochee River. Any remaining portion of the referenced sections are excluded from this agreement.

<sup>1</sup>. SECO makes no representation or warranty regarding the scope or accuracy of WREC’s service territory, as such determinations remain solely within WREC’s authority. Applies to all references to WREC’s service territory in this section.

\* Territorial areas are described within the Quarter Grid Boundary. If there are any discrepancies between Exhibit A and Exhibit B, the territorial written description in Exhibit B shall prevail.