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STATE OF FLORIDA



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Public Service Commission

April 16, 2025

STAFF'S FIRST DATA REQUEST

via email

Malcolm N. Means, Esquire
Ausley McMullen
Post Office Box 391
Tallahassee, FL 32302-0391
mmeans@ausley.com

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

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

Dear Mr. Means and Mr. Roberts:

By this letter, the Commission staff requests that Talquin Electric Cooperative, Inc. (Talquin) and The City of Quincy (Quincy) provide responses to the following data requests:

1. Rule 25-6.0441(1), Florida Administrative Code (F.A.C.), states, in part, that “each utility party must provide a description of the planned load to be served in the area of dispute . . .” Paragraph 22 of the Petition reflects that 155 single-family residential lots were planned for the subject property, as of March 10, 2025 (the date the Petition was filed).
 - a. Paragraph 28 of the Petition references that rezoning efforts could impact the subject property. Please provide an update regarding the planned density for the subject property, specifically addressing whether the number of lots that are planned for this property has changed since March 10, 2025, or is finalized.

- b. If applicable, identify the density changes and discuss how such changes would impact the planned load for serving this area. A response from each party to this dispute is requested.
2. Paragraph 22 of the Petition includes the term "Talquin's historic service area." Please state whether the utilities are in complete agreement with what this term means, or whether the use of this term itself is a matter of dispute. If applicable, provide a response from each party stating their respective definition for the term "Talquin's historic service area."
3. Rule 25-6.0441(2)(a), F.A.C., states, in part, that the Commission may consider "the extent to which additional facilities are needed."
 - a. Please describe whether overhead or underground construction activities would be needed to serve the disputed area. Include in the description the approximate distance the new construction would traverse from current facilities. A response from each party to this dispute is requested.
 - b. Describe the age or general condition of nearest existing facilities (i.e., the starting point for new construction to the disputed area) in terms of being adequately sized to reliably serve the planned and/or future electrical load for the disputed area. A response from each party to this dispute is requested.
4. Rule 25-6.0441(2)(c), F.A.C., states, in part, that the Commission may consider the cost for each utility to "provide distribution and subtransmission facilities to the disputed area presently and in the future." Please state the most current estimate of the cost for provisioning facilities to the subject area. A response from each party to this dispute is requested.
5. Rule 25-6.0441(2)(d), F.A.C., states, in part, that the Commission may consider any other factor that may be relevant in reaching a determination that the resolution of the territorial dispute is in the public interest.
 - a. (For Talquin only). Please state one or more factors Talquin believes should merit the Commission's consideration pursuant to Rule 25-6.0441(2)(d), F.A.C.
 - b. (For Quincy only). Please state one or more factors Quincy believes should merit the Commission's consideration pursuant to Rule 25-6.0441(2)(d), F.A.C.

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Please file all responses electronically no later than April 28, 2025, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gel@psc.state.fl.us.*

Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless

Suzanne Brownless

Special Counsel

SBr/ds

cc: Office of Commission Clerk