

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Territorial Dispute Between ) DOCKET NO. 20250039-EU  
Talquin Electric Cooperative, Inc. and )  
the City of Quincy )  
\_\_\_\_\_ ) FILED: April 28, 2025

**CITY OF QUINCY'S RESPONSES TO THE PSC's  
SECOND 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 Second Data Request transmitted via letter dated April 16, 2025 (hereinafter "SDR"). and would state the following

**PSC SDR 1.** "Please refer to Staff's First Data Request No. 3. Please provide a map that identifies where the nearest existing facilities are located in relation to the disputed area."

**Quincy's RESPONSE to 1:** Page 1 of Exhibit 1 to this Response is a street map depicting the disputed area, which is contiguous with existing Quincy Electric customers, including a multi-family development. The distance measurement of approximately 1400 feet on this page depicts the line on which 7 of the planned 10 spans will be added.

Page 2 of Exhibit 1 is a plat map from Gen Land. This depicts 25 of the Phase 1 lots and again demonstrates the physical proximity between the development and existing multi-family Quincy Electric customers.

Page 3 of Exhibit 1 is a street map locating our South Distribution Station on 604 South Steward Avenue, and demonstrating a distance of approximately 2 miles of 12.47

KV distribution line between the Station and the planned distribution connection for the new development.

As stated in Quincy's Opposition ¶¶14-19 and our Response to the FDR 5.b, granting Talquin's Petition will bring the distribution lines and residential connections of the two utilities into dangerous and unnecessary proximity.

**SDR 2.a** "Please state whether Quincy is aware of an unapproved infringements upon either party's territory."

**RESPONSE to 2.a:** We respectfully request an additional ten (10) days to respond to this request, as we attempt to locate and gain information from the previous head of Quincy Electric who served until 2022.

**SDR 3.b.** "If applicable, describe any investments made since December 2010 that relied upon the expired Territorial Agreement, and specify the approximate dollar value of such investments."

**RESPONSE to 3.b:** None. Quincy Electric did not plan our capital expenditures and investments based on the expired Agreement.

Respectfully submitted this 28<sup>th</sup> day of April, 2025.

**GARY A. ROBERTS & ASSOCIATES, LLC**

*/s/ Gary A Roberts*

**GARY A. ROBERTS, ESQUIRE**

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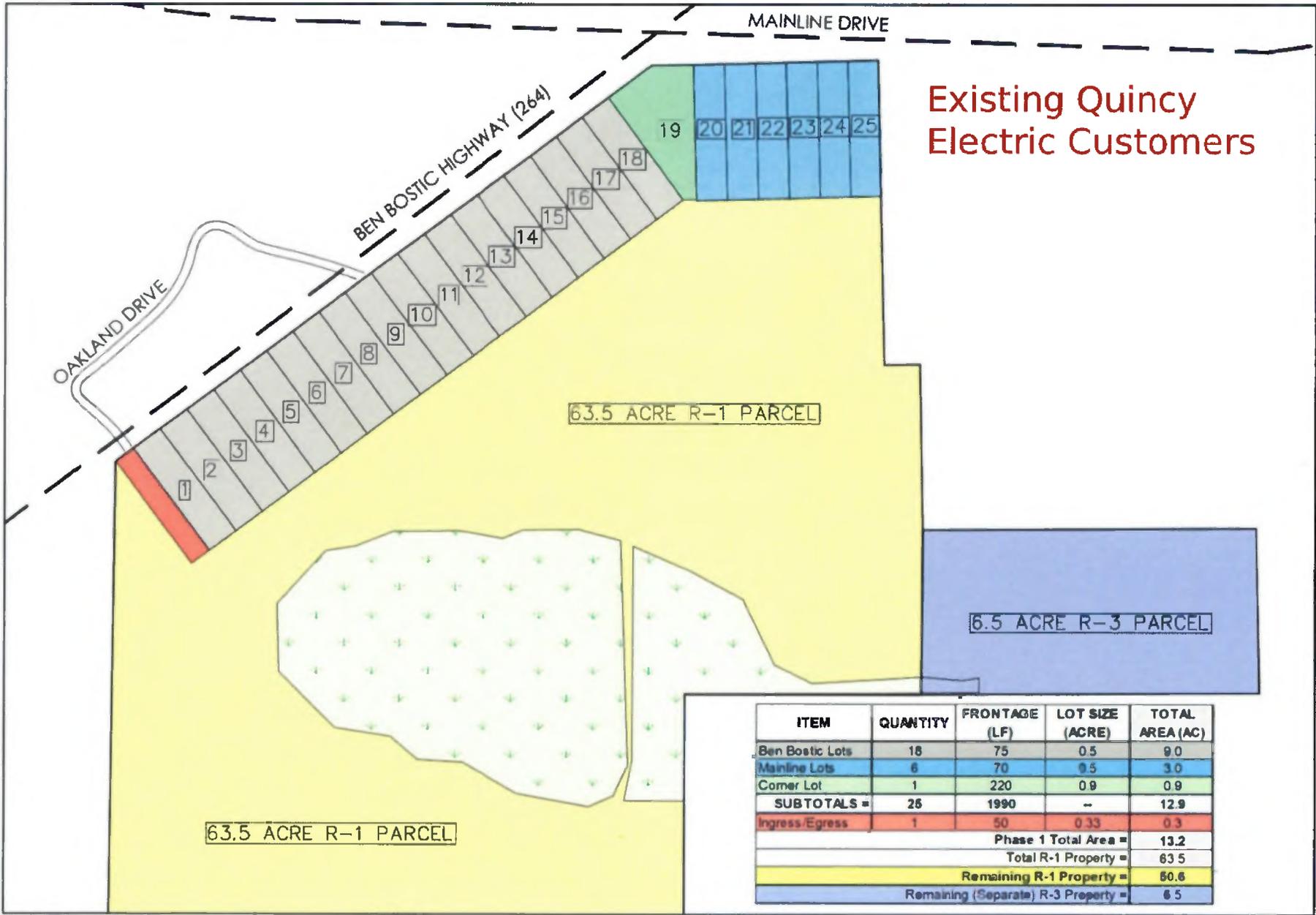
City Attorney, for City of Quincy, FL

# **EXHIBIT 1**

To Quincy's Response to PSC's Second Data Request

Maps depicting distance from QE distribution lines to the disputed area and the proximity of the new development to existing QE residential connections.





# Existing Quincy Electric Customers



3820 North Federal Highway  
 19th Fl  
 Ft. Lauderdale, FL 33308  
 P 954 408 3388

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

| DATE     | REVISION |
|----------|----------|
| 11/08/04 | APPROVAL |
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PREPARED FOR  
**REVIEW**



DATE: 01/13/05  
 DRAWN BY: GSP  
 CHECKED BY: GSP  
 DESIGNED BY:  
 THE INFORMATION CONTAINED ON THIS SHEET IS TO BE USED IN FULLY COMPLIANCE WITH ALL APPLICABLE REGULATIONS AND STANDARDS.

SHEET NUMBER  
**C-1.00**

| ITEM                                       | QUANTITY  | FRONTAGE (LF) | LOT SIZE (ACRE) | TOTAL AREA (AC) |
|--|-----------|---------------|-----------------|-----------------|
| Ben Bostic Lots                            | 18        | 75            | 0.5             | 9.0             |
| Mainline Lots                              | 6         | 70            | 0.5             | 3.0             |
| Corner Lot                                 | 1         | 220           | 0.9             | 0.9             |
| <b>SUBTOTALS =</b>                         | <b>25</b> | <b>1990</b>   | <b>--</b>       | <b>12.9</b>     |
| Ingress/Egress                             | 1         | 50            | 0.33            | 0.3             |
| <b>Phase 1 Total Area =</b>                |           |               |                 | <b>13.2</b>     |
| <b>Total R-1 Property =</b>                |           |               |                 | <b>63.5</b>     |
| <b>Remaining R-1 Property =</b>            |           |               |                 | <b>50.6</b>     |
| <b>Remaining (Separate) R-3 Property =</b> |           |               |                 | <b>6.5</b>      |

