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September 10, 2021

Via E-Mail

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

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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 First Data Requests dated August 19, 2021 ("Data Requests"). For ease of reference, the Data Requests are repeated verbatim herein, with the response immediately following each item.

- Section 4.3 of the proposed territorial agreement states that "Upon approval by the Commission, this Agreement shall be deemed to specifically supersede any and all prior agreements between the parties regarding their respective retail service areas in Calhoun, Jackson, and Washington counties". Please list the agreement approval Order numbers and expiry dates of the prior agreements, if any.

Response: This is the cooperatives' first territorial agreement in Calhoun, Jackson and Washington Counties. There are no prior agreements.

- Please confirm if this proposed territorial agreement in this pending docket is the joint petitioners' first territorial agreement in Calhoun, Jackson, and Washington counties.

Response: See the response to Request No. 1.

- Please list the municipalities and communities, by county, to be served by GCEC within its service territory subject to this agreement.

Response: GCEC does not serve in any municipalities within its service territory subject to this agreement.

4. Please list the municipalities and communities, by county, to be served by WFEC within its service territory subject to this agreement.

Response: WFECA provides service in Grand Ridge, Jackson County, and in Wausau, Washington County.

5. Please list the number of potential customers to be served by GCEC within its service territory subject to this agreement.

Response: Over the term of the territorial agreement and adjusted for growth, GCEC projects that it will serve approximately 5383 potential member-customers in Calhoun, Jackson and Washington Counties.

6. Please list the number of potential customers to be served by WFEC within its service territory subject to this agreement.

Response: Over the term of the territorial agreement and adjusted for growth, WFECA projects that it will serve approximately 18370 potential member-customers in Calhoun, Jackson and Washington Counties.

7. Please state if other electric utilities provide service within Calhoun, Jackson, and Washington counties.

Response: The City of Blountstown and Florida Public Utilities (“FPU”) serve in other areas of Calhoun County. FPU and Gulf Power Company (“GPC”) serve in other areas of Jackson County. GPC serves in other areas of Washington County.

8. The maps included in the petition indicates the cities of Grand Ridge in Jackson County and Wausau in Washington County are served by WFEC while the cities of Altha, Blountstown, Vernon, Chipley, Alford, Marianna, and Cottondale in Calhoun, Jackson, and Washington counties does not indicate which electric utility provides service to those municipalities. Please confirm if the municipalities listed are not served by either GCEC or WFEC.

Response: Except for Grand Ridge in Jackson County and Wausau in Washington County (which WFECA serves), none of the listed municipalities are served by either GCEC or WFECA.

9. The map titled *WFEC-GCEC Territory Boundary Full Extent* does not include the complete county boundaries. Please provide a larger map showing the complete boundaries of Calhoun, Jackson, and Washington counties, the WFEC-GCEC service territory boundary, along with the respective distribution/service areas of WFEC-GCEC.

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Response: The map has been reformatted as staff requested and is attached.

10. Pursuant to Rule 25-6.0440(1)(a), F.A.C., please provide written descriptions (legal description or Section, Township and Range) of the areas to be served by GCEC, Inc. and WFEC, Inc.

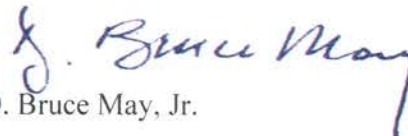
Response: The referenced rule only requires “[a] map and written description,” it does not require a legal description. Nonetheless, in order to provide a more granular description of the territorial boundary, the cooperatives have provided a .kmz file which, when opened in *Google Earth Pro*, can be used as an interactive map by hovering the cursor to specify latitude-longitude coordinates for each point along the boundary line. A .dwg file has also been provided and can be opened in *CAD*. Pursuant to your office’s directions, the .kmz and the .dwg files have been downloaded onto a USB Flash Drive which will be hand-delivered to the Commission Clerk contemporaneous with the electronic filing of these responses.

* * *

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
Enclosures

cc: Sevini Guffey (via email w/Encl.)
Jennifer Crawford, Esq. (via email w/Encl.)
Ryan Sandy, Esq. (via email w/Encl.)
Ty Peel (via email w/Encl.)
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