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STATE OF FLORIDA



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# Public Service Commission

April 16, 2025

## STAFF'S SECOND DATA REQUEST *via email*

Malcolm N. Means, Esquire  
Ausley McMullen  
Post Office Box 391  
Tallahassee, FL 32302-0391  
[mmeans@ausley.com](mailto:mmeans@ausley.com)

Gary A. Roberts, Esquire  
City Attorney, Quincy Florida  
130 Salem Court  
Tallahassee, FL 32301  
[garyr@garyrobertslaw.com](mailto: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. 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. A response from each party to this dispute is requested.
2. Paragraph 16 of the petition states, in part, "However, from December 2010 to the present, the parties have continued to honor the territorial area prescribed in the [expired] Territorial Agreement and Talquin is unaware of any unapproved infringements upon either party's territorial area."
  - a. (For Quincy only). Please state whether Quincy is aware of an unapproved infringements upon either party's territory.

3. Paragraph 18 of the petition states Talquin relied on the expired Territorial Agreement in making investments.
  - a. (For Talquin only) Please describe the investments made since December 2010 that relied upon the expired Territorial Agreement, and specify the approximate dollar value of such investments.
  - b. (For Quincy only) 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.

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