



FILED 4/28/2025  
DOCUMENT NO. 03209-2025  
FPSC - COMMISSION CLERK

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April 28, 2025

**VIA: ELECTRONIC FILING**

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

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

Dear Mr. Teitzman:

Attached for filing in the above docket is Talquin Electric Cooperative's Response to Staff's First Data Request (Nos.1-5) and Staff's Second Data Request (Nos. 1-3), both propounded on April 16, 2025.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Malcolm N. Means'.

Malcolm N. Means

Attachment

cc: All Parties of Record (w/encl.)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Talquin Electric Cooperative's responses to Staff's First Data Request (Nos.1-5) and Staff's Second Data Request (Nos. 1-3), have been furnished by electronic mail on this 28th day of April 2025 to the following:

Ms. Suzanne Brownless  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)

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ATTORNEY

TALQUIN ELECTRIC COOPERATIVE  
DOCKET NO. 20250039-EU  
STAFF'S **FIRST** DATA REQUEST  
REQUEST NO. 1  
BATES PAGE(S): 1  
FILED APRIL 28, 2025

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.

TALQUIN’S RESPONSE to 1(a) and 1(b): To Talquin’s knowledge, no changes to the layout or density of the proposed Bostick Road Property Development have been formally approved by the Quincy City Commission since the filing of Talquin’s Petition.

Based on the number of single-family residential units anticipated for the proposed Development of the Bostick Road Property (currently 155 lots), the anticipated load for the development on the Bostick Road Property will be approximately 930 – 1,240 kW. The Bostick Road Property and surrounding area is served by Talquin’s Gretna Substation, which is located approximately four (4) miles away from the Bostick Road Property. Currently there are approximately 3,500 services connected to Talquin’s Gretna Substation, which has the capacity to serve 56,000 kW. In December 2024 the highest load for the Gretna Substation was only 14,438 kW with the highest load in recent years occurring in December 2022 at 18,321 kW at its peak. Accordingly, the Gretna Substation is designed to handle the fully anticipated load of the proposed Bostick Road Development.

TALQUIN ELECTRIC COOPERATIVE  
DOCKET NO. 20250039-EU  
STAFF'S **FIRST** DATA REQUEST  
REQUEST NO. 2  
BATES PAGE(S): 2  
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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.”

TALQUIN’S RESPONSE: References to “Talquin’s historic service area” in the Petition are intended to have the same meaning as the “Cooperative Territorial Area” as defined in the March 22, 1995 Territorial Agreement. Talquin believes the parties are in complete agreement on the meaning of this term and the specific boundaries outlined in the 1995 Territorial Agreement.

TALQUIN ELECTRIC COOPERATIVE  
DOCKET NO. 20250039-EU  
STAFF'S **FIRST** DATA REQUEST  
REQUEST NO. 3  
BATES PAGE(S): 3  
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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.

TALQUIN’S RESPONSE to 3(a): To serve the Bostick Road Property Development, Talquin would require only one span of three phase overhead primary to cross Ben Bostick Road from Talquin’s existing utility pole on the north side of Ben Bostick Road to an underground residential distribution (URD) riser pole to be installed on the south side of Ben Bostick Road. This span would be approximately sixty-five (65) feet. Electric service to the Bostick Road Property Development would be distributed from the URD riser pole to the subdivision via primary underground cable.

TALQUIN’S RESPONSE to 3(b): The existing utility pole on the north side of Ben Bostick Road referenced in Talquin’s Response to 3(a) was installed in 2022 and the electric distribution line running parallel to Ben Bostick Road was built that same year. The electric distribution line running parallel to Ben Bostick Road is a main line three-phase distribution feeder with 336 Aluminum Conductor Steel Reinforced (ACSR) distribution conductor. This line is adequate to serve the entirety of the proposed Bostick Road Property Development without further improvements aside from the one span extension of overhead primary identified in Talquin’s Response to 3(a).

Talquin’s existing facilities are sufficient to serve the anticipated electrical load from the proposed Bostick Road Property Development as well as all surrounding parcels. The electric distribution line running parallel to Ben Bostick Road was installed in anticipation of serving both the existing load and future loads, as well as operating as a backfeed line to serve temporary load from Wetumpka Substation in the event of an outage at that Substation.

TALQUIN ELECTRIC COOPERATIVE  
DOCKET NO. 20250039-EU  
STAFF'S **FIRST** DATA REQUEST  
REQUEST NO. 4  
BATES PAGE(S): 4  
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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.

TALQUIN'S RESPONSE: The cost to install the approximately sixty-five (65) foot span of overhead primary distribution line and the URD riser pole referenced in Talquin's Response to 3(a) is estimated to cost Talquin only \$3,471.70.

TALQUIN ELECTRIC COOPERATIVE  
DOCKET NO. 20250039-EU  
STAFF'S **FIRST** DATA REQUEST  
REQUEST NO. 5  
BATES PAGE(S): 5-6  
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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.

TALQUIN'S RESPONSE: Talquin believes the following factors merit the Commission's consideration pursuant to Rule 25-6.0441(2)(d), F.A.C.:

- i. The 1995 Territorial Agreement between the parties and the territorial boundaries set forth therein. When entering into the 1995 Territorial Agreement, the parties recognized that the purpose and intent of the Agreement was to "eliminate and avoid the needless and wasteful expenditures and potentially hazardous situations which would otherwise result from unrestrained competition between the parties operating overlapping service areas." See Agreement, Article VI. The territorial boundary lines agreed upon by the parties and approved by the Commission in the 1995 Territorial Agreement were constructed in recognition of this purpose, which remains just as important in 2025 as it was in 1995. Furthermore, the agreed upon "City Territorial Area" as defined in 1995 Territorial Agreement was greater than the Quincy city limits as they existed in 1995; thus, the parties appear to have contemplated the anticipated growth of the City of Quincy when defining the City Territorial Area and the Cooperative Territorial Area.
- ii. Talquin's investments in the service territory surrounding the City of Quincy in reliance on the boundaries set forth in the 1995 Territorial Agreement. Talquin maintains facilities immediately adjacent to the proposed Bostick Road Property Development. These facilities are a result of Talquin designing their system to be prepared to capably and reliably serve all areas within their service territory surrounding the City of Quincy as outlined in the 1995 Territorial Agreement. This is evidenced by Talquin's readiness to serve the proposed Bostick Road Property Development with only minimal cost to bring electrical

service to the Property. Further detail about the specific investments made by Talquin to the area surrounding the City of Quincy are detailed in Response to 3(a) in Staff's Second Data Request.

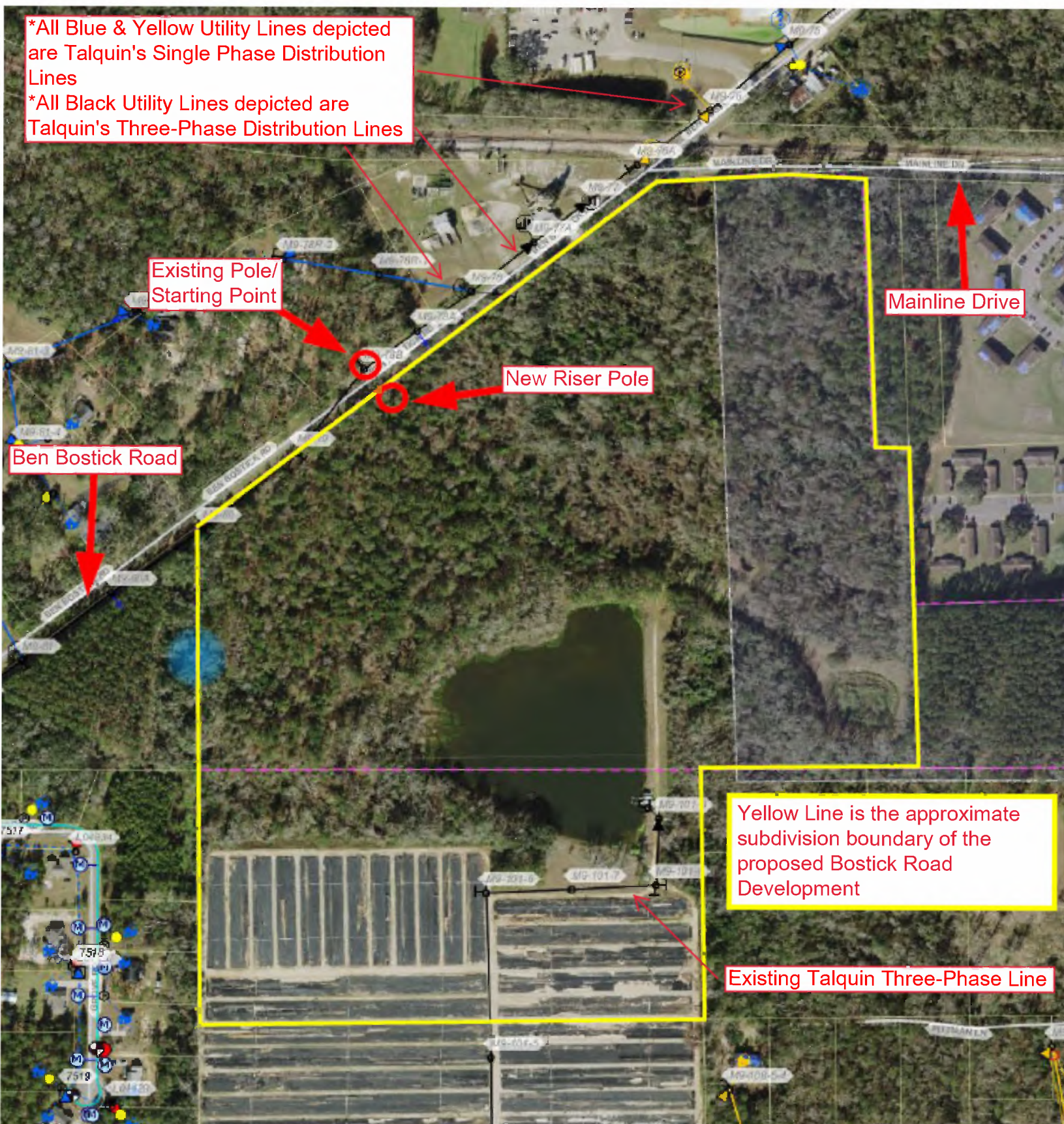
- iii. Reliability of Talquin's Service. Where geographically possible, Talquin has designed its system to have the capability to serve its Members from multiple substations. This helps reduce the number of unplanned restorations and allows Talquin to perform planned system maintenance with minimal disruptions to its Members. The Bostick Road Property can be served by multiple Talquin substations (its Gretna Substation and its Wetumpka Substation).
- iv. Talquin has continued to honor the territorial lines that define its historical service territory around the City of Quincy. Since expiration of the 1995 Territorial Agreement in 2010, Talquin has continued to serve customers within the "Cooperative Territorial Area" as defined in the 1995 Territorial Agreement and only served customers in the "City Territorial Area" if specifically authorized to do so by the City of Quincy and pursuant to the Agreement.



TALQUIN ELECTRIC COOPERATIVE  
DOCKET NO. 20250039-EU  
STAFF'S **SECOND** DATA REQUEST  
REQUEST NO. 1  
BATES PAGE(S): 7-8  
FILED APRIL 28, 2025

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.

TALQUIN RESPONSE: See map below.



TALQUIN ELECTRIC COOPERATIVE  
DOCKET NO. 20250039-EU  
STAFF'S **SECOND** DATA REQUEST  
REQUEST NO. 2  
BATES PAGE(S): 9  
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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.

TALQUIN RESPONSE: Response not requested.

TALQUIN ELECTRIC COOPERATIVE  
DOCKET NO. 20250039-EU  
STAFF'S **SECOND** DATA REQUEST  
REQUEST NO. 3  
BATES PAGE(S): 10  
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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.

TALQUIN RESPONSE: A review of Talquin's capital projects since 2010 identified the following investments by Talquin and its Members in its system to better serve the area surrounding the City of Quincy's service territory as defined in the 1995 Territorial Agreement.

- a. As part of Talquin's 2019-2024 Construction Work Plan, Talquin constructed a substation tie line running approximately 6.4 miles along Ben Bostick Road to connect Talquin's Gretna Substation with Talquin's Wetumpka Substation. The cost of the project to Talquin and its Members was \$994,863.06. This connection greatly improved the reliability of electrical service to all Members served by Talquin's Gretna and Wetumpka Substations.
- b. In order to complete the above described project to electrically connect Talquin's Gretna Substation with Talquin's Wetumpka Substation, Talquin first had to upgrade Talquin's Gretna Substation from 12.5 kV to 25 kV to match the voltage of Talquin's Wetumpka Substation (25 kV). This upgrade was part of Talquin's 2014-2019 Construction Work Plan which cost Talquin and its Members \$827,044.09. This project included replacing the Gretna Substation power transformer, reinsulating the distribution lines with 25 kV insulators, and replacing distribution transformers that were only operational at 12.5 kV. In addition to the subsequent tie line between Talquin's Gretna and Wetumpka Substations, other benefits of the project included (i) a reduction in line loss costs which improves efficiency and reduces Talquin's power costs; and (ii) the ability to serve a greater load using the existing distribution lines due to the approximate 50% reduction in the current (amps) necessary to serve the existing loads, thereby delaying the future need to upgrade Talquin's distribution lines to meet the anticipated growth in load.



- c. Throughout the last 15-years, Talquin has continued to add new services in the area surrounding the City of Quincy's service territory as defined in the 1995 Territorial Agreement. Each of these new services required installation of transformers along with primary and/or secondary line extensions. Each new residential service can cost Talquin and its Members up to \$6,500 per service.
- d. Throughout the last 15-years, Talquin has continued to maintain the vegetation along the distribution lines throughout the area surrounding the City of Quincy's service territory as defined in the 1995 Territorial Agreement. Talquin estimates its cost of vegetation maintenance trimming at \$8,000 per mile per five (5) year trimming cycle.
- e. Throughout the last 15-years, Talquin has conducted normal maintenance related to operating an electric utility system throughout the area surrounding the City of Quincy's service territory as defined in the 1995 Territorial Agreement. This includes the continued replacement and upgrade of lines, transformers, poles, and other equipment due to the expiring useful life or unexpected failure of these facilities. These upgrades are performed as needed, when needed, at the same level as all other service areas within Talquin's system. The costs of these regular maintenance activities are difficult to track specific to the area surrounding the City of Quincy's service territory.