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# Public Service Commission

May 1, 2025

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

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. Roberts:

By this letter, the Commission staff requests that The City of Quincy (Quincy) provide responses to the following data requests:

1. Overlaid on the map provided, please provide clearly defined designations (with a key) of the 1995 territorial boundaries. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.
2. Overlaid on the map provided, please provide clearly defined designations (with a key) of the existing territorial boundaries. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.
3. Overlaid on the map provided, please provide clearly defined designations (with a key) of Quincy's existing service facilities. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.
4. Overlaid on the map provided, please provide clearly defined designations (with a key) of Quincy's proposed serving facilities. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.

5. Overlaid on the map provided, please provide clearly defined designations (with a key) of Phase 1 through Phase 4 of the proposed development areas. If necessary, the provided map can be expanded or cropped to allow sufficient space for the requested detail.

6. In response to Staff's First Data Request No. 5.b., Quincy stated, "As detailed in Quincy's Opposition, granting Talquin's Petition would bring the distribution equipment, lines and transformers on the two utilities into dangerous and unnecessary physical proximity."

Please indicate on the maps provided the area(s) where Quincy believes the electric facilities will be in dangerous and unnecessary physical proximity if Talquin provides electric service to:

- Bostick property, exclusive of Phase 4 of the development project. (Map 1)
- Bostick property and Phase 4 of the development project. (Map 2)

7. In response to Staff's Second Data Request No. 3.b., Quincy stated, "Quincy Electric did not plan our capital expenditures and investments based on the expired Agreement." Please explain what basis Quincy used for planning capital expenditures and investments with respect to territorial boundary lines in the proximity of the Bostick property.

Please file all responses electronically no later than May 15, 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

cc: Office of Commission Clerk

