



August 27, 2025

ELECTRONIC FILING

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

Re: Docket 20250039-EU, In re: Petition to resolve territorial dispute in Gadsen County
with the City of Quincy, by Talquin Electric Cooperative, Inc.

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket is Talquin Electric Cooperative, Inc. and
the City of Quincy's Joint Motion to Suspend Procedural Schedule.

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

MNM/
Attachment
cc: All Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to resolve territorial dispute in
Gadsden County with the City of Quincy, by
Talquin Electric Cooperative, Inc.

DOCKET NO. 20250039-EU

FILED: August 27, 2025

**JOINT MOTION OF TALQUIN ELECTRIC COOPERATIVE, INC.
AND THE CITY OF QUINCY TO SUSPEND PROCEDURAL SCHEDULE**

Talquin Electric Cooperative, Inc. ("Talquin") and the City of Quincy ("Quincy") (collectively, the "Parties") have reached an agreement that will resolve all of the issues in this case and require additional time to prepare and file a joint petition seeking approval of a territorial agreement. Accordingly, pursuant to Section 120.57(4), Fla. Stat. (2024), Rule 28-106.204, Florida Administrative Code (F.A.C.), and PSC Order No. PSC-2025-0262-PCO-EU ("OEP") issued on July 8, 2025, the Parties request that the Florida Public Service Commission ("Commission") issue an order suspending the procedural schedule in this docket as specified below, and state:

1. On March 10, 2025, Talquin filed a Petition to Resolve Territorial Dispute with Quincy¹ ("Petition") to seek reaffirmation of the territorial boundaries described in the Parties' now expired 1995 Territorial Agreement² and to resolve an immediate dispute that exists between Talquin and Quincy as to which utility will provide electric service to a new development to be located on a 65-acre vacant parcel of property on Ben Bostick Road in Gadsden County (Parcel No. 3-10-2N-4W-0000-00441-0100) together with the surrounding parcels.

2. On March 31, 2025, Quincy filed a petition in opposition to the Petition.³

¹ See DN 01430-2025.

² Order No. PSC-1995-1522-FOF-EU, issued December 11, 1995 in Docket No. 950532-EU.

³ See DN 02321-2025.

3. Page 5 of the OEP notes that the Commission has a long history of considering settlement agreements and contemplates the possibility that this docket could be resolved by settlement agreement.

4. The Parties have answered multiple sets of Data Requests from Commission Staff and participated in an informal meeting with Commission Staff on June 23, 2025.

5. Since that time, the Parties negotiated and finalized a new territorial agreement that would define the service boundary between the two utilities. Talquin's Board of Trustees approved the agreement on August 20, 2025 and the Quincy City Commission approved the agreement on August 26, 2025.

6. The Parties are working in earnest to prepare and file a joint petition seeking Commission approval of the Parties' new territorial agreement. The Parties anticipate filing a petition in this proceeding on or before September 5, 2025.

7. The Parties believe that suspending the procedural schedule is necessary so they may focus on completing execution of the territorial agreement and finalizing a joint petition for Commission approval while avoiding the unnecessary work and expense that the continued litigation of this case would require.

8. The Parties therefore requests that the Commission enter an order suspending all deadlines and other procedural requirements matters in this docket.

9. The undersigned has consulted with counsel for Quincy and is authorized to represent that Quincy supports this motion.

WHEREFORE, for the reasons stated above, the parties respectfully request that the Commission enter an order suspending all pending hearings, deadlines, and other matters in this

docket pending the Parties' submission of joint petition seeking approval of the Parties' territorial agreement that resolves all disputed issues in this proceeding.

Respectfully submitted this 27th day of August, 2025.



Malcolm N. Means
Fla. Bar No. 127586
mmeans@ausley.com
Kevin A. Forsthoefel
Fla. Bar No. 092382
kforsthoefel@ausley.com
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TALQUIN
ELECTRIC COOPERATIVE, INC.

/s/ Gary A. Roberts, Esquire
Gary A. Roberts, Esquire
Florida Bar No. 0069620
130 Salem Court.
Tallahassee, Florida 32301
(850) 513-0505
(850) 513-0318-Facsimil
garyr@garyrobertslaw.com

ATTORNEY FOR CITY OF QUINCY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that electronic copies of the foregoing Joint Motion to Suspend Procedural Schedule has been furnished by electronic mail on August 27, 2025 to the following:

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

Mr. Gary A. Roberts
City Attorney, Quincy, Florida
130 Salem Court
Tallahassee, FL 32301
garyr@garyrobertslaw.com

A handwritten signature in blue ink, appearing to read "Michael N. Means".

ATTORNEY