



Matthew R. Bernier  
Sr. Counsel  
Duke Energy Florida, Inc.

June 27, 2014

**VIA OVERNIGHT MAIL**

Ms. Carlotta Stauffer, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RECEIVED-FPSC  
14 JUN 27 AM 10:30  
COMMISSION  
CLERK

Re: *Joint petition for approval of territorial agreement in Franklin and Liberty Counties by Talquin Electric Cooperative, Inc. and Duke Energy Florida, Inc.; 140123-EU*

Dear Ms. Stauffer:

Please find enclosed for filing on behalf of Duke Energy Florida, Inc. ("DEF"), an original and five (5) copies of DEF's Response to Staff's First Data Request (Nos. 1-3).

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Respectfully,

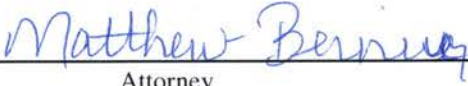

Matthew Bernier  
Matthew R. Bernier  
Sr. Counsel  
[Matthew.Bernier@duke-energy.com](mailto:Matthew.Bernier@duke-energy.com)

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO 2 \_\_\_\_\_ MRB/mw
- ENG \_\_\_\_\_ Enclosures
- GCL 3 \_\_\_\_\_
- IDM \_\_\_\_\_
- FEL \_\_\_\_\_
- CLK \_\_\_\_\_

Docket No. 140123

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 27<sup>th</sup> day of June, 2014.

  
\_\_\_\_\_  
Attorney 

<p>Martha Brown Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:mbrown@psc.state.fl.us">mbrown@psc.state.fl.us</a></p> <p>Tracy Bensley, General Manager P.O. Box 1679 Tallahassee, FL 32353-1679 <a href="mailto:tbensley@talquinelectric.com">tbensley@talquinelectric.com</a></p>	<p>James Harold Thompson Post Office Box 391 111 West Madison Street, #812 Tallahassee, FL 32302 <a href="mailto:jthompson@ausley.com">jthompson@ausley.com</a></p> <p>Paul Lewis, Jr. 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 <a href="mailto:paul.lewisjr@duke-energy.com">paul.lewisjr@duke-energy.com</a></p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**DUKE ENERGY FLORIDA, INC.'S RESPONSES TO  
STAFF'S FIRST DATA REQUEST (NOS. 1 - 3)  
Docket No. 1400123-EI**

1. Please provide a copy of an official Florida Department of Transportation General Highway County map for each affected county depicting boundary lines established by the territorial agreement, as described in Rule 25-6.0440(f), Florida Administrative Code.

**RESPONSE**

The Florida Department of Transportation General Highway County maps for Franklin and Liberty counties depicting boundary lines established by the territorial agreement are attached.

2. Please refer to Attachment A of the petition, page 5, Section 0.3. Please explain each difference between the Prior Agreement and the proposed agreement filed in this docket.

**RESPONSE**

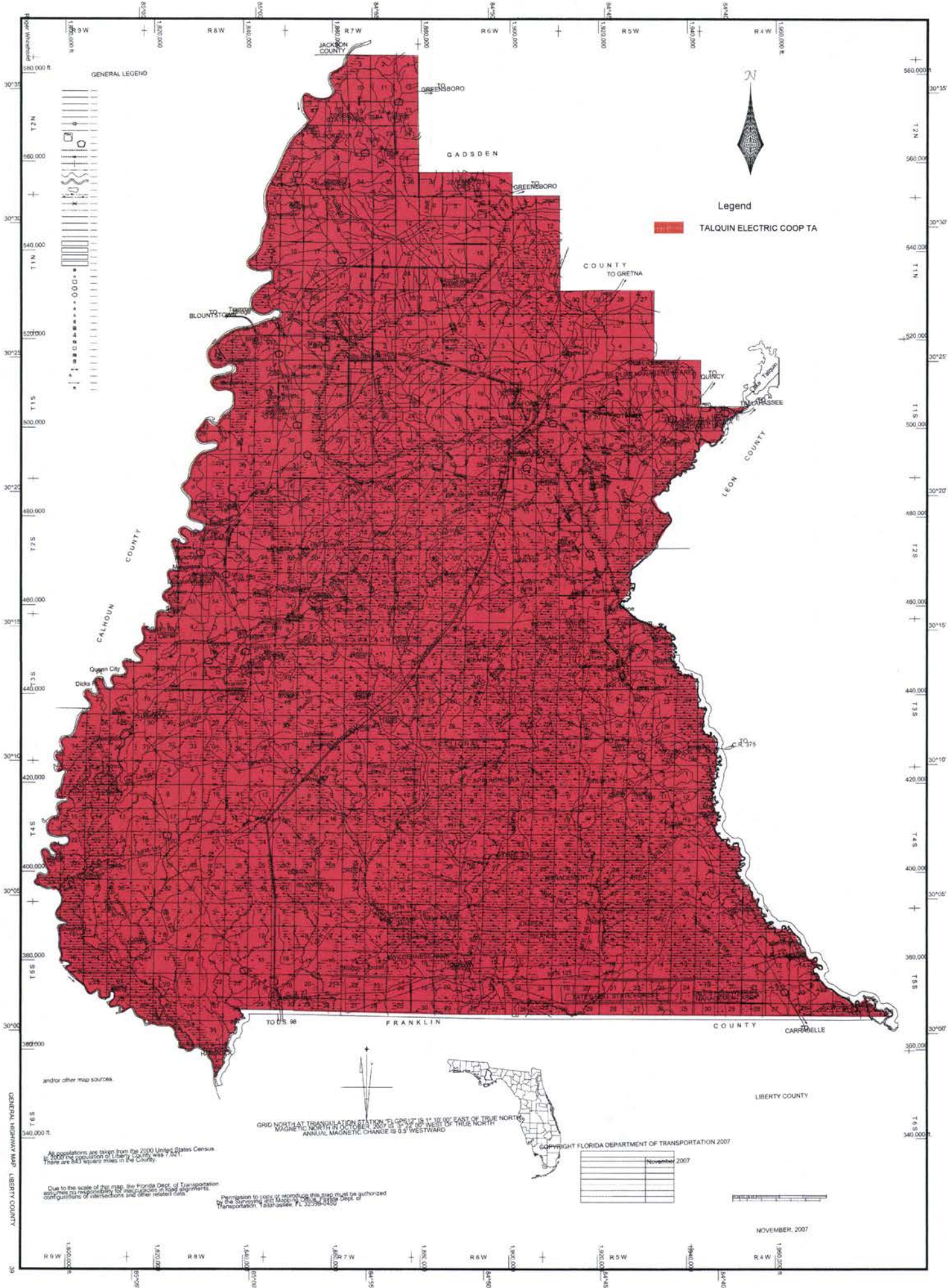
The territorial boundaries in the proposed agreement remain the same as those set forth in the previous Talquin and DEF territorial agreement approved by the Commission on October 3, 1995, by Order No. PSC-95-1215-FOF-EU in Docket No. 950785-EU. The proposed territorial agreement has been negotiated for a term of 30 years, whereas the Prior Agreement had a duration of 15 years. The territorial boundary maps in the proposed agreement have been updated to a GIS format and demonstrate the territorial boundary lines in much greater detail. A written description is included in the proposed agreement as required pursuant to Rule 25-6.0440(1)(a), F.A.C.

3. Please refer to Attachment A of the petition, page 5, Sections 0.1, 0.3, and 0.4. Please explain why there is a lapse in time between the October 3, 2010 expiration of the Prior Agreement and the June 3, 2014 date the parties entered into the agreement filed in this docket.

**RESPONSE**

Duke Energy and Talquin Electric Cooperative needed to perform due diligence to evaluate the Prior Agreement and determine any conflicts, known or unknown, which necessitated resolution as a part of the new Agreement. Part of this due diligence included validating the proposed territorial boundaries as depicted in the Joint Petition between Duke Energy and Talquin Electric Cooperative for Liberty and Franklin counties. After the expiration of the Prior Agreement, the Parties continued to abide by its term while the new Agreement was being negotiated.





GENERAL LEGEND



Legend

TALQUIN ELECTRIC COOP TA

GRID NORTH AT TRIANGULATION STATION TA 95127 IS 11° 15' 00" EAST OF TRUE NORTH  
 MAGNETIC NORTH IN OCTOBER, 2007 IS 1° 24' 00" WEST OF TRUE NORTH  
 ANNUAL MAGNETIC CHANGE IS 0.5" WESTWARD

All populations are taken from the 2000 United States Census. In 2000 the population of Liberty County was 1,021. There are 543 square miles in the County.

Due to the scale of this map, the Florida Dept. of Transportation assumes no responsibility for inaccuracies in road alignments, configurations or intersections and other related data.

Permission to copy or reproduce this map must be authorized by the Surveying and Mapping Section, Florida Dept. of Transportation.

	November 2007

NOVEMBER 2007

GENERAL HIGHWAY MAP - LIBERTY COUNTY