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OF COUNSEL  
C. FABBS BRYANT

\*ADMITTED IN GEORGIA ONLY

October 15, 1991

Mr. Steve Tribble, Director  
Division of Records & Reporting  
Public Service Commission  
Fletcher Building  
101 East Gaines Street  
Tallahassee, Florida 32399-0870

**ORIGINAL  
FILE COPY**

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(404) 483-0300

Re: Petition of Suwannee Valley Electric Cooperative, Inc. to resolve a territorial dispute with Florida Power & Light Company (Live Oak Innkeepers, Inc. - Best Western Motel); Docket #910991-EU

ACK   
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG   
LEG \_\_\_\_\_  
LIN \_\_\_\_\_  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC \_\_\_\_\_  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

Dear Mr. Tribble:

Attached please find original and 15 copies of Florida Power and Light Company's Answer which I will appreciate your filing in the above styled case.

Sincerely,

*J. Christian Meffert*  
J. Christian Meffert

bbk

enclosures

RECEIVED & FILED

*[Signature]*  
EPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10230 OCT 15 1991

EPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Suwannee Valley  
Electric Cooperative, Inc. to resolve  
a territorial dispute with Florida  
Power & Light Company (Live Oak  
Innkeepers, Inc. -- Best Western Motel).

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Docket No. 910991-EU

A N S W E R

Florida Power & Light Company (hereinafter "FPL") by and through its undersigned attorneys, files this Answer to Suwannee Valley Electric Cooperative, Inc.'s (hereinafter "SVEC") Petition to Resolve Territorial Dispute, and says:

1. Paragraphs 1, 2 and 3 are admitted.
2. With respect to paragraph 4:
  - a. Admits that FPL provided service at the time and to the place alleged, but specifically denies that FPL did so "unsafely" or that FPL did anything unsafe.
  - b. FPL is without sufficient knowledge to admit or deny sub-paragraphs b, c, d and e of the Petition.
3. With respect to paragraph 5:
  - a. FPL denies any improper encroachment or uneconomic duplication of electric service.
  - b. FPL admits that SVEC had previously provided service to a portion of the property.
  - c. FPL is without sufficient knowledge to admit or deny how SVEC may have "previously positioned itself" with regard to the subject property.
  - d. FPL admits that it crossed under the distribution line of SVEC in providing service.
4. FPL denies paragraph 6.
5. FPL affirmatively states that FPL provided service pursuant to a request for service by the customer and pursuant to its obligation pursuant to §366.03, Florida Statutes, to "furnish to each person applying therefor . . . service. . . ."

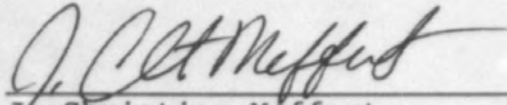
DOCUMENT NUMBER-DATE

10230 OCT 15 1991

FPC-RECORDS/REPORTING

WHEREFORE, the Respondent, FPL, requests that the Commission take jurisdiction of this matter and resolve the territorial dispute.

Respectfully submitted,



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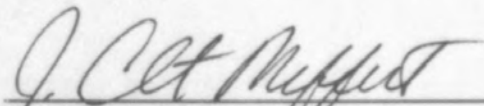
and

K. Crandal McDougall  
Florida Power & Light Company  
Post Office Box 029100  
Miami, Florida 33102-9100  
(305) 552-3921  
Fla. Bar No. 763284

Attorneys for FLORIDA POWER &  
LIGHT COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Answer has been furnished by U. S. Mail to James W. Prevatt, Jr., Esq., Post Office Drawer 8, Live Oak, Florida 32060 and C. Dean Lewis, Esq., Post Office Drawer 8, Live Oak, Florida 32060 this 15th day of October, 1991.



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J. Christian Meffert