



The Independent Savings Plan Company

Robert B. Hicks, Esquire
Chief Administrative Officer

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FILE COPY

July 24, 1995

VIA HAND DELIVERY

Blanca Bayo, Director
Division of Records and Reporting
Public Service Commission
2540 Shurmard Oak Blvd.
Tallahassee, Florida 32399-0850

RE: Motion for Extension of Time to File Responses to
Motions to Dismiss
Docket Nos. 941170-EG, 941171-EG, 941172-EG, 941173-EG

Dear Ms. Bayo:

Enclosed for filing is the above referenced document,
together with 15 copies.

Counsel for Independent Savings Plan Company and Solar City,
Inc. has spoken with counsel for Tampa Electric Company ("TECO").
TECO is not opposed to the granting of an extension until August
11, 1995.

Please stamp the copy of this letter to serve as a receipt
for filing of the Motion.

If you have any questions, please feel free to call me.

Sincerely,

Robert B. Hicks
Robert B. Hicks

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Approval of Demand-Side
Management Plan of Florida Power
& Light Company.

DOCKET NO. 941170-EG

In Re: Approval of Demand-Side
Management Plan of Florida Power
Corporation.

DOCKET NO. 941171-EG

In Re: Approval of Demand-Side
Management Plan of Gulf Power
Company.

DOCKET NO. 941172-EG

In Re: Approval of Demand-Side
Management Plan of Tampa
Electric Company.

DOCKET NO. 941173-EG

MOTION FOR EXTENSION OF TIME TO FILE
RESPONSES TO MOTIONS TO DISMISS

The Independent Savings Plan Company ("ISPC") and Solar City, Inc., ("SOLAR") hereby request an extension of time in which to file responses to the motions to dismiss filed in response to ISPC's and SOLAR's Joint Petition on Proposed Agency Action.

In support thereof, ISPC and SOLAR state:

1. ISPC and SOLAR filed a Joint Petition on Proposed Agency Action on June 30, 1995.

2. On July 14, 1995, Tampa Electric Company ("TECO") filed a Motion to Dismiss Joint Petition on Proposed Agency Action of the Independent Savings Plan Company and Solar City, Inc.

3. On July 17, 1995, Florida Power & Light Company ("FP&L")

DOCUMENT NUMBER-DATE

07059 JUL 24 85

FPSC-RECORDS/REPORTING

filed a Motion in Opposition to (ISPC's and SOLAR's) Joint Petition on Proposed Agency Action.

4. On July 20, 1995, Florida Power Corporation ("FPC") filed Florida Power Corporation's Motion to dismiss Joint Petition on Proposed Agency Action of the Independent Savings Plan Company and Solar City, Inc.

5. Under Rule 25-22.037(2), F.A.C., ISPC and SOLAR have seven day, plus five days for service by mail (Rule 25-22.028(4), to file memorandums in opposition to the motions to dismiss. Under the rule, the last day for responding to TECO's motion is July 26, 1995, to FP&L's motion is July 31, 1995 (Monday following due date), and to FPC's motion is August 1, 1995.

6. TECO's, FP&L's and FPC's motions are similar and argue that ISPC's and SOLAR's substantial interests will not be affected by the Commission's Proposed Agency Action. ISPC and SOLAR would like to address this issue as to all three motions, and would like to be able to do so, at a minimum, based on the time frame for responding to FPC's motion, the last motion filed. The granting of this request will not delay the proceeding, since, in all likelihood, the Commission would wait until a response is filed to FPC's motion before acting on all three motions.

7. Also, ISPC and SOLAR would like to provide the Commission with as thorough an analysis of the issues involved as possible. In order to do so, ISPC and SOLAR need additional time to complete their legal research and would like to receive an extension of time to file responses to the motions to dismiss until August 7, 1995.

Based on the foregoing, ISPC and SOLAR respectfully request an extension of time to file responses to the motions filed by FP&L, FPC and TECO until August 7, 1995, or, if that is not possible, an extension of time to file responses to the motions filed by TECO and FP&L until August 1, 1995.

Respectfully submitted,



Robert B. Hicks
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813/881-1988
ATTORNEY FOR THE
INDEPENDENT SAVINGS PLAN
COMPANY AND SOLAR CITY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Joint Petition on Proposed Agency Action has been furnished by U.S. Mail this 27 day of July, 1995 to the following:

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