## RUTLEDGE, ECENIA, UNDERWOOD, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
KENNETH A. HOFFMAN
THOMAS W. KONRAD
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY B. RUTLEDGE
R. MICHAEL UNDERWOOD

WILLIAM B. WILLINGHAM

POST OFFICE BOX 551, 32302-0551 215 SOUTH MONROE STREET, SUITE 420 TALLAHASSEE, FLORIDA 32301-1841 GOVERNMENTAL CONSULTANTS: PATRICK R. MALOY AMY J. YOUNG

TELEPHONE (904) 681-6788 TELECOPIER (904) 681-6515

UNIGNAL

August 16, 1995

HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center Room 110 Tallahassee, Florida 32399-0850

Re: Docket No. 950307-EU

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Jacksonville Electric Authority are the original and fifteen copies of Jacksonville Electric Authority's Motion for Extension of Time to File Prefiled Rebuttal Testimony and Exhibits.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffmar

--- KAH/rl

cc: All Parties of Record

--- RECEIVED & FILED

SAC FPSC-BUREAU OF RECORDS

YV - (C)

DTH -

DOCUMENT NUMBER-DATE

07844 AUG 16 #

FPSC-RECORDS/REPORTING



## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Jacksonville	)				
Electric Authority to Resolve a	)				
Territorial Dispute with Florida	)	Docket	No. 95030	7-EU	
Power & Light Company in St. Johns	)				
County	)	Filed:	August	16,	1995
	1				

## JACKSONVILLE ELECTRIC AUTHORITY'S MOTION FOR EXTENSION OF TIME TO FILE PREFILED REBUTTAL TESTIMONY AND EXHIBITS

The Jacksonville Electric Authority ("JEA"), by and through its undersigned counsel, hereby requests the Prehearing Officer to enter an Order granting JEA an extension of time for the filing of its prefiled rebuttal testimony and exhibits from August 21, 1995 to August 28, 1995. In support of this Motion, JEA states as follows:

- 1. JEA and Florida Power & Light Company ("FPL") have been engaged in settlement negotiations concerning the issues raised in this docket on an on-going basis. JEA and FPL have made considerable progress in the negotiations. JEA believes that there is a reasonable prospect that the material components of a settlement between the two parties may be reached prior to August 28, 1995. For this reason, JEA wishes to avoid the expenditure of time and resources on prefiled rebuttal testimony and exhibits currently due August 21, 1995 which may prove to be unnecessary. Further, JEA wishes to concentrate its efforts on the pending settlement negotiations with FPL.
- 2. No party or staff will be prejudiced by postponing the filing of JEA' prefiled rebuttal testimony and exhibits until August 28, 1995, assuming such testimony is necessary.

DOCUMENT NUMBER - DATE

07844 AUG 16 8

3. Counsel for JEA has discussed this Motion with counsel for FPL and is authorized to represent that FPL does not object to the extension of time requested by JEA pursuant to this Motion. Counsel for JEA also has discussed this Motion with Staff counsel and agrees to serve responses to any staff discovery requests directed to JEA's prefiled rebuttal testimony and exhibits within fourteen (14) days of service thereof.

WHEREFORE, JEA respectfully requests the Prehearing Officer to enter an Order granting JEA an extension of time until August 28, 1995 for the filing of JEA's prefiled rebuttal testimony and exhibits.

Respectfully submitted,

KENNETH A. MOFFMAN, ESQUIRE WILLIAM B. WILLINGHAM, ESQUIRE Rutledge, Ecenia, Underwood,

Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, Florida 32302-0551 (904) 681-6788

and

BRUCE PAGE, ESQUIRE Jacksonville Electric Authority 220 East Bay Street Suite 600 Jacksonville, FL 32202 (904) 630-1316

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by U. S. Mail and hand delivery(\*) this 16th day of August, 1995:

Mark A. Logan, Esq. Bryant, Miller & Olive 201 South Monroe Street Suite 500 Tallahassee, Florida 32301

Beth Culpepper, Esq.(\*)
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald L. Gunter Building
Room 370
Tallahassee, Florida 32399-0850

KENNETH A. HOFFMAN, ESQUIRE

Jacksonville/JEA.2extend