

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve territorial dispute with Gulf Coast Electrical Cooperative, Inc. by Gulf Power Company) Docket No. 930885-EU Filed: April 4, 1994

JOINT MOTION OF GULF POWER COMPANY AND GULF COAST ELECTRICAL COOPERATIVE FOR EXTENSION OF STAY

Gulf Power Company ["Gulf Power", "Gulf", or "the Company"], jointly with Gulf Coast Electrical Cooperative, Inc. ["the Cooperative"], by and through their undersigned attorneys, hereby request that the Florida Public Service Commission ["Commission"] enter an order extending the stay previously granted in the above docket in Order No. PSC-94-0128-PCO-EU, issued February 3, 1994, for a period of thirty (30) days in order to allow the parties to continue negotiations concerning this territorial dispute. As grounds for this Motion, the parties state:

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APP

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1. Gulf Power and Gulf Coast Electrical Cooperative, Inc. ["the Cooperative"] have entered into negotiations during the sixty (60) day stay previously granted by the Commission, and wish to continue such negotiations.

2. At the time the sixty (60) day stay was entered, certain procedural matters were pending, including the filing of direct testimony on behalf of the Company and discovery responses from both parties.

REC'D EPSC

DOCUMENT NUMBER-DATE

03073 APR-13

FPSC-RECORDS/REPORTING

3. In the interests of efficiency and economy, the parties desire that all pending procedural matters continue to be stayed for a period of thirty (30) days. Such a stay will allow the parties and the Commission Staff to avoid time-consuming, costly, and potentially unnecessary activity before the Commission while the negotiations are ongoing.

4. The parties further request that the hearing date of August 15, 1994 previously established in Order No. PSC-94-0128-PCO-EU remain as scheduled so that, in the event the parties are unable to reach a resolution of this dispute, the matter can be submitted to the Commission in a timely manner.

5. The parties request that any order granting the requested stay provide that the stay will automatically expire either at the conclusion of the thirty (30) day extension period if no agreement has been reached by such date.

6. The parties further request that, upon expiration of the stay, all dates for pre-filing of testimony and submission of responses to any pending discovery be re-established based on an extension of the original deadlines by the total number of days the proceedings were actually stayed, with the exception of the hearing date previously established.

WHEREFORE, Gulf Power Company and Gulf Coast Electrical Cooperative, Inc. request an order staying these proceedings, and all further activity relating thereto, for a period of thirty (30) days in order to allow the parties to this dispute to continue ongoing negotiations.

Respectfully submitted this 1st day of April, 1994.



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_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. Mail the 1st day of April, 1994, on the following:

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