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July 12, 1994

Blanca Bayo, Director  
Division of Records and Reporting  
101 E. Gaines Street  
Tallahassee, Florida 32301

ORIGINAL COPY

**RE: GULF COAST ELECTRIC COOPERATIVE INC.'S MOTION FOR CONTINUANCE**

Dear Mrs. Bayo:

Please find attached an original and 15 (fifteen) copies of **Gulf Coast Electric Cooperative Inc.'s Motion for Continuance**.

We would appreciate your filing and distributing copies as appropriate.

Very truly yours,

John H. Haswell

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*Bradley Brown*  
*H*

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to Resolve )  
Territorial Dispute With Gulf )  
Coast Electric Cooperative )  
Inc. by Gulf Power Company )

DOCKET NO.: ~~88000~~ 88000

GULF COAST ELECTRIC COOPERATIVE INC.'S MOTION FOR CONTINUANCE

Gulf Coast Electric Cooperative Inc. (Gulf Coast) respectfully requests the Florida Public Service Commission to enter an Order continuing the Hearing in this case until February 1st and 2nd of 1995 for the following reasons:

1. The Hearing has been scheduled for August 15th, 1994 for one half day. It is not reasonably possible for the witnesses whose testimony has been prefiled to summarize their testimony and conclude cross and redirect examination in that short of period of time. In addition, the initial portion of the Hearing will involve preliminary issues and a basic position statement of the two parties. Allowing one half day or even one day for the development of the fourteen issues identified in this case is unreasonable.

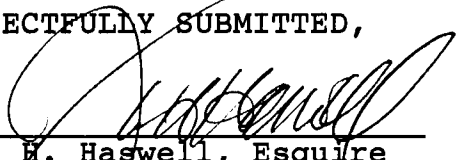
2. The scope of the issues as developed by discovery and through meetings with staff clearly show that issues regarding what constitutes the "disputed area" merits consideration, and it is Gulf Coast's position that the Commission should consider all areas of Washington and Bay Counties where these two utilities serve and have parallel facilities. The opportunity for the Commission to resolve potential service areas disputes and uneconomic duplication of facilities is too important to attempt a short time frame for the presentation of the case by the two parties.

3. Gulf Coast has filed testimony of four witnesses and Gulf Power has filed direct testimony of one witness and rebuttal testimony of four witnesses. In addition, Gulf Power has asked for additional time to file more testimony on the issues raised by Gulf Coast witnesses (unless the Commission were to enter an Order limiting issues as Gulf Power requests). Even if the Commission were to limit the issues to the physical boundaries of the correctional facility itself, the fourteen issues identified by staff and the parties are sufficient to allow testimony on all matters addressed by Gulf Coast witnesses, including the matters that Gulf Power seeks to avoid.

4. Service to the Department of Corrections will not be impaired by a continuance.

WHEREFORE, Gulf Coast Electric Cooperative Inc. respectfully requests that the Pre-hearing Conference and the Hearing be rescheduled to the next available time when the Commission can allow two full days for Hearing, which we are advised is February 1st and 2nd of 1995. The Pre-hearing itself should be rescheduled for seven to fourteen days prior to the Hearing. This will allow Gulf Power sufficient time to file whatever additional testimony it desires and for Gulf Coast to respond, for additional discovery and for presentation of the issues in this case.

RESPECTFULLY SUBMITTED,



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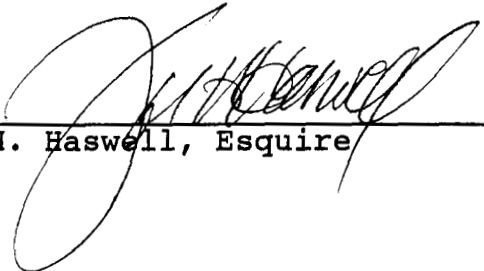
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I HEREBY CERTIFY that a copy of the foregoing has been furnished July,  
12<sup>th</sup>, 1994 by U.S. Mail.

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\_\_\_\_\_  
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