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ORIGINAL
FILE COPY

June 6, 1995

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

HAND DELIVERY

Re: Docket No. 950307-EU

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Jacksonville Electric Authority and Florida Power & Light Company are the original and fifteen copies of a Joint Motion for Extension of Time to File Testimony and Prehearing Statements.

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. Hoffman
Kenneth A. Hoffman

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____ KAH/rl
- EAG Bas cc: All Parties of Record
- LEG 1
- LIN 3
- CFC _____
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Jacksonville)
Electric Authority to Resolve a)
Territorial Dispute with Florida)
Power & Light Company in St. Johns)
County)

Docket No. 950307-EU

Filed: June 6, 1995

JOINT MOTION FOR EXTENSION OF TIME
TO FILE TESTIMONY AND PREHEARING STATEMENTS

Petitioner Jacksonville Electric Authority ("JEA") and Respondent FLORIDA POWER & LIGHT COMPANY ("FPL") hereby jointly request the Prehearing Officer for an extension of time to file testimony and prehearing statements. In support of their Joint Motion, JEA and FPL state as follows:

1. On March 20, 1995, JEA initiated this proceeding by filing a Petition to Resolve Territorial Dispute in St. Johns County. FPL filed its Answer and Affirmative Defenses, amended its Answer, and subsequently filed a Second Amended Answer (withdrawing its Affirmative Defenses) and Counter-Petition. JEA has moved to dismiss FPL's Counter-Petition.

2. JEA and FPL have undertaken settlement negotiations in this case. The parties are at the point where they believe that the best interests of both will be served by concentrating their efforts and resources over the next 30 to 40 days on settlement matters rather than on litigating this case.

3. JEA and FPL commit to continue the negotiating process over the next 30 to 40 days so that the parties will have enough information to make a decision as to whether to request an additional postponement (including, possibly, a postponement of the final hearing scheduled for September 27, 1995) or to proceed to

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FPSC-RECORDS/REPORTING

final hearing as currently scheduled.

4. Accordingly, JEA and FPL request the Prehearing Officer to enter an Order revising the Revised Order Establishing Procedure issued May 2, 1995 and granting extensions of time for filing testimony and prehearing statements in accordance with the following proposal:

	<u>Current Due Date</u>	<u>Proposed Due Date</u>
Testimony - Petitioner	June 7, 1995	July 10, 1995
Testimony - Respondent	June 27, 1995	July 31, 1995
Testimony - Intervenor/ Staff	July 7, 1995	August 10, 1995
Rebuttal Testimony	July 14, 1995	August 21, 1995
Prehearing Statements	August 24, 1995	September 4, 1995

5. JEA and FPL stipulate that each will serve responses to any Staff interrogatories or requests for production of documents within twenty-one (21) days, rather than within thirty (30) days per the Florida Rules of Civil Procedure, in order to ensure that Staff has sufficient time to prepare for final hearing if the Prehearing Officer grants the extensions requested in paragraph 4 above and this case does proceed to final hearing on September 27, 1995.

WHEREFORE, JEA and FPL respectfully request the Prehearing Officer to enter an Order:

1) granting this Joint Motion for Extension of Time to File Testimony and Prehearing Statements;

2) revising the due dates for the filing of testimony and prehearing statements consistent with the proposed due dates in

paragraph 4 above; and

3) acknowledging the parties' stipulation to serve responses to any Staff interrogatories or requests for production within twenty-one (21) days as long as the final hearing in this docket remains scheduled for September 27, 1995.

Respectfully submitted,

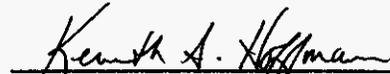


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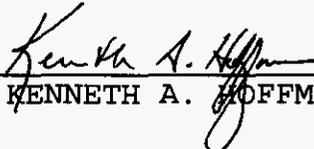
Attorneys for JEA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by hand delivery (*) and U. S. Mail this 6th day of June, 1995:

Mark K. Logan, Esq. (*)
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JEA.Extend