

11/20/0

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 R. RUTLEDGE
R. MICHAEL UNDERWOOD
WILLIAM B. WILLINGHAM

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

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

GOVERNMENTAL CONSULTANTS:
PATRICK R. MALOY
AMY J. YOUNG

**ORIGINAL
FILE COPY**

September 19, 1995

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

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 Filing of Petition for Approval of New Territorial Agreement.

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,

William B. Willingham

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- LEG
- LIN
- OPC
- RCH
- SEC
- NAS
- OTH

WBW/rl

cc: All Parties of Record

RECEIVED & FILED
W
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
09230 SEP 19 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition of Jacksonville)
Electric Authority to Resolve a) DOCKET NO. 950307-EU
Territorial Dispute with Florida)
Power & Light Company in St.) Filed: September 19, 1995
_____)

JOINT MOTION FOR EXTENSION OF FILING OF
PETITION FOR APPROVAL OF NEW TERRITORIAL AGREEMENT

Florida Power & Light Company ("FPL") and Jacksonville Electric Authority ("JEA") jointly move this Commission for an order granting an extension of the filing date for a petition for approval of new territorial agreement and state:

1. On August 31, 1995, the Commission entered an Order suspending the remaining filing and hearing dates in this docket due to resolution of the underlying territorial dispute between JEA and FPL.

2. Since the entry of the order suspending the filing dates, the parties have been working on finalizing a new territorial agreement and petition to approve the same. These activities are substantially complete; however, the parties are still working to assemble customer transfer information, maps and other information necessary for Commission approval of a new territorial agreement.

3. Accordingly, the parties move for an order from the Commission extending the date to file a petition to approve a new territorial agreement for two weeks. This extension will not cause interruption of any of the remaining dates currently scheduled in the docket nor delay Commission approval of a new territorial agreement.


DOCUMENT NUMBER-DATE

09230 SEP 19 95

FPSC-RECORDS/REPORTING

WHEREFORE, the parties jointly request the Commission to extend the filing deadline for a petition to approve a new territorial agreement for an additional two weeks.

Respectfully submitted,




Mark K. Logan
Bryant, Miller and Olive, P.A.
201 S. Monroe St., Suite 500
Florida 32301
(904) 222-861
Florida Bar No.: 0494208

and

Edward Tancer
Florida Power & Light Company
Post Office Box 029100
Miami, Florida 33102-9100
(305) 552-3921
Florida Bar No.: 509159

ATTORNEYS FOR FLORIDA
FLORIDA POWER & LIGHT COMPANY



Kenneth A. Hoffman
Rutledge, Ecenia, Underwood,
Purnell & Hoffman
215 S. Monroe St., Ste. 420
Tallahassee, Florida 32301
(904) 681-6788
Florida Bar No.: 307718

and

Bruce Page
600 City Hall
220 East Bay Street
Jacksonville, Florida 32202
(904) 630-1300
Florida Bar No.: 651389

ATTORNEYS FOR JACKSONVILLE
ELECTRIC AUTHORITY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served by U.S. Mail on Beth Culpepper, Esquire, Florida Public Service Commission, Gerald L. Gunter Building, Room 301, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850, this 19th day of September, 1995.



ATTORNEY