

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6000

ORIGINAL
FILE COPY



September 11, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 930885-EU

Enclosed are an original and fifteen copies of the Motion to Expand Length of Gulf Power Company's Position on Issues 1, 3, and 4 to be filed in the above docket.

Sincerely,

Susan D. Cranmer

ACK _____
 AFA _____ Susan D. Cranmer
 APP _____ Assistant Secretary and Assistant Treasurer
 CAF _____
 DMU _____
 CTR _____ Enclosure
 EAD _____
 LEG _____ 1 cc: Beggs and Lane
 LIR _____ 3 Jeffrey A. Stone, Esquire
 OTH _____
 REC _____
 SEC _____ 1
 WAS _____
 OTH _____

DOCUMENT NUMBER-DATE

09295 SEP 12 97

FPSC-RECORDS/REPORTING.

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. 930885-EU
Filed: September 12, 1997

**MOTION TO EXPAND LENGTH OF
GULF POWER COMPANY'S POSITION
ON ISSUES 1, 3 and 4**

Gulf Power Company ["Gulf Power"], by and through its undersigned attorneys, and pursuant to Rule 25-22.038(3), Florida Administrative Code, and in accordance with the Order Establishing Procedure in this docket, PSC-96-0466-PCO-EU (as amended by Order Nos. PSC-96-1274-PCO-EU, PSC-97-0793-PCO-EU and PSC-97-1000-PCO-EU), hereby requests that it be permitted to exceed the fifty (50) word limit on its positions to Issue Nos. 1, 3 and 4 of its Statement of Issues and Positions, or Gulf Power Company's Post-Hearing Brief, for the following reasons:

1. Commission Order No. PSC-97-1000-PCO-EU, requires Gulf Power Company to submit a statement of issues and positions, or post-hearing brief. The summary of each position must be no more than fifty (50) words.
2. Issue No. 1 asks a question that cannot be adequately answered in fifty (50) words or less. This is as a result of the need to list a series of maps. The list of maps requires over half of the fifty (50) word limit. The remaining number of words is not sufficient to take a position. Gulf Power requests that it be allowed to state a position of fifty-five (55) words on Issue No. 1.
3. Issue No. 3 requests information that is best provided in table form. Gulf Power has provided such a table with minimal explanatory notes. The explanatory notes are necessary to give meaning to and to adequately explain the information in the table. The table and

DOCUMENT NUMBER-DATE

09295 SEP 12 5

FPSC-RECORDS/REPORTING

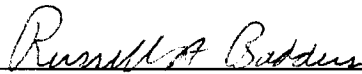
000856

accompanying explanatory notes exceed the fifty (50) word limit. Gulf Power requests that its position as contained in its post-hearing brief be allowed, as written, although it exceeds the fifty (50) word limit.

4. Issue No. 4 requests information that cannot be provided in fifty (50) words or less. Gulf Power has provided a position that does exceed the fifty (50) word limit, however, no further discussion on Issue No. 4 is presented in the post-hearing brief. Gulf Power requests that its position, as stated in its post-hearing brief, be allowed to exceed the fifty (50) word limit in lieu of discussion regarding that position in the body of the brief.

WHEREFORE, Gulf Power Company respectfully requests that the Florida Public Service Commission issue an order allowing Gulf Power Company to exceed the fifty (50) word limit on its positions to Issue Nos. 1, 3 and 4, consistent with this motion.

Respectfully submitted this 11th day of September, 1997.



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 7455

Beggs & Lane

Post Office Box 12950

Pensacola, Florida 32576-2950

(904) 432-2451

Attorneys for Gulf Power Company

000857

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition to resolve territorial dispute with Gulf) Docket No. 930885-EU
Coast Electric Cooperative, Inc. by Gulf Power Company.) Filed: September 12, 1997
_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. Mail this 11th day of September 1997 on the following:

Bob Elias, Esquire
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0863

John H. Haswell, Esquire
Chandler, Lang & Haswell, P.A.
P.O. Box 23879
Gainesville, FL 32602

J. Patrick Floyd, Esquire
P.O. Box 950
Port St. Joe, FL 32456



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 7455

Beggs & Lane

P. O. Box 12950

(700 Blount Building)

Pensacola, Florida 32576-2950

(904) 432-2451

Attorneys for Gulf Power Company