

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Declaratory Statement)	Docket No. 980283-EQ
that Commission's Approval of Negotiated)	
Contract for Purchase of Firm Capacity)	Submitted for
and Energy between Florida Power)	Filing: March 11, 1998
Corporation and Metropolitan Dade County,)	
Order No. 24734, Together with Order)	
Nos. PSC-97-1437-FOF-EQ, Rule)	
25-17.0832, F.A.C., and Order No.)	
24989, Establish that Energy Payments)	
thereunder, including when Firm or As-)	
Available Payment is Due, Are Limited)	
to Analysis of Avoided Costs based upon)	
Avoided Unit's Contractually-Specified)	
Characteristics.)	

**METROPOLITAN DADE COUNTY'S AND MONTENAY DADE, LTD.'S
 UNOPPOSED MOTION FOR ENLARGEMENT OF
 TIME TO FILE A MOTION TO DISMISS FLORIDA
 POWER CORPORATION'S PETITION FOR
DECLARATORY STATEMENT**

Metropolitan Dade County ("Dade County") and Montenay-Dade, Ltd. ("Montenay"), pursuant to Rule 25-22.037, Florida Administrative Code ("F.A.C.") hereby request an enlargement of time to file a motion to dismiss Florida Power Corporation's ("FPC") Petition for Declaratory Statement and in support thereof state:

ACK _____
 AFA _____
 APP _____
 CAF _____
 CMU _____
 CTR _____

1. On February 24, 1998, FPC initiated the instant docket by filing a Petition for Declaratory Statement. Pursuant to Rule 25-22.037(2), F.A.C., a motion in opposition to FPC's Petition for Declaratory Statement must be filed by March 16, 1998.

2. Dade County's counsel has been out of the office for the past two weeks and will also be out until March 16, and she will thus not have adequate time to assist in the preparation of Dade

RECORDS

County's and Montenay's motion to dismiss FPC's Petition for Declaratory Statement within the time prescribed by Rule 25-22.037, F.A.C. Accordingly, Dade County and Montenay request that the Commission grant an enlargement of time up to and including the close of business on Friday, March 27, 1998 for the filing of a joint motion to dismiss FPC's Petition for Declaratory Statement.

3. At the same time that this motion was filed, Dade County and Montenay filed with the Commission a joint petition to intervene in the instant docket for the limited purpose of moving to dismiss FPC's Petition for Declaratory Statement. Subject to the Commission's granting the petition to intervene and this motion for enlargement, Dade County and Montenay expect to file their joint motion to dismiss FPC's Petition for Declaratory Statement by Friday, March 27, 1998.

4. Undersigned counsel has discussed this requested enlargement with FPC's counsel and is authorized to represent that FPC does not object to this request.

WHEREFORE, Dade County and Montenay respectfully request that the Commission enlarge the time up to and including the close of business on March 27, 1998, for the filing of Dade County's and Montenay's joint motion to dismiss FPC's Petition for Declaratory Statement.

Respectfully submitted this 11th day of March, 1998.



Robert Scheffel Wright
Florida Bar No. 966721
LANDERS & PARSONS, P.A.
310 West College Avenue (ZIP 32301)
Post Office Box 271
Tallahassee, Florida 32302
Telephone (850) 681-0311
Telecopier (850) 224-5595

COUNSEL FOR METROPOLITAN DADE
COUNTY AND MONTENAY-DADE, LTD.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished this 11th day of March, 1998, by regular U.S. Mail to Chris S. Coutroulis, Esquire and Robert L. Ciotti, Esquire, Carlton, Fields, Ward, Emmanuel, Smith & Cutler, Post Office Box 3239, 777 S. Harbour Island Blvd, Tampa, Florida 33602 and James A. McGee, Esquire, Office of the General Counsel, Florida Power Corporation, 3201 34th Street South, Post Office Box 14042, St. Petersburg, Florida 33733-4042 and by hand-delivery to David E. Smith, Esquire, Director of Appeals, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Third Floor, Gunter Building, Tallahassee, Florida 32399-0850.



Robert Scheffel Wright
Florida Bar No. 966721
LANDERS & PARSONS, P.A.
310 West College Avenue (ZIP 32301)
Post Office Box 271
Tallahassee, Florida 32302
Telephone (850) 681-0311
Telecopier (850) 224-5595