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Pensacola, Florida 32520

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ORIGINAL



July 2, 1999

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. 990250-EI  
Docket No. 990244-EI

Enclosed for filing are an original and fifteen copies of Gulf Power Company's Motion for Extension of Time for Serving Responsive Pleadings to Coalition's Petition on Proposed Agency Action.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Motion in WordPerfect for Windows 8 format as prepared on a Windows NT based computer.

Sincerely,

*Linda G. Malone*

Linda G. Malone  
Assistant Secretary and Assistant Treasurer

lw

Enclosures

cc: Beggs and Lane  
Jeffrey A. Stone, Esquire  
Gulf Power Company  
Susan D. Ritenour

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the earnings and )  
authorized return on equity of Gulf Power ) Docket No. 990250-EI  
Company. )  
\_\_\_\_\_ )

In re: Petition of Gulf Power Company for )  
approval of proposed plan for an incentive ) Docket No. 990244-EI  
revenue sharing mechanism that addresses )  
certain regulatory issues including a reduction ) Date filed: July 6, 1999  
to the Company's authorized return on equity. )  
\_\_\_\_\_ )

**GULF POWER COMPANY'S**  
**MOTION FOR EXTENSION OF TIME FOR**  
**SERVING RESPONSIVE PLEADINGS TO**  
**COALITION'S PETITION ON PROPOSED AGENCY ACTION**

Gulf Power Company ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned counsel, hereby requests an extension of time in which to serve any pleadings in response to the Petition on Proposed Agency Action filed on June 14, 1999 by the Coalition for Equitable Rates ("Coalition"). In support of this motion, the Company states:

1. Pursuant to Rule 25-22.037, Florida Administrative Code, Gulf Power may file responsive pleadings to Coalition's Petition on Proposed Agency Action ("Coalition's Petition") within twenty (20) days of service of the petition. That period is extended five (5) additional days by operation of Rule 25-22.028(4), Florida Administrative Code. As a result, Gulf's opportunity to timely file responsive pleadings to Coalition's Petition currently runs until July 9, 1999.

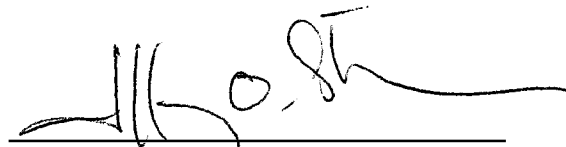
2. In an effort to resolve the issues raised in Coalition's Petition without the need for further litigation, representatives of Gulf Power and Coalition are engaged in ongoing discussions. In the interest of administrative efficiency, the parties need additional time to

determine whether an agreement can be reached that may allow this matter to be resolved without the need for responsive pleadings and further litigation. Towards that end, Gulf requests a modest extension of the deadline for filing responsive pleadings established by Rule 25-22.037 and Rule 25-22.028(4), Florida Administrative Code. Specifically, Gulf requests an extension of the deadline so that responsive pleadings served on or before July 21, 1999 shall still be considered timely.

3. Counsel for the Coalition has been consulted prior to filing this motion and has authorized Gulf Power to advise the Commission that Coalition agrees to the requested extension.

WHEREFORE, Gulf Power Company respectfully requests that the date for serving responsive pleadings to Coalition's Petition on Proposed Agency Action be extended so that such pleadings may be served on or before July 21, 1999.

Respectfully submitted this 2nd day of July 1999.



**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A BADDERS**

Florida Bar No. 0007455

**Beggs & Lane**

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(850) 432-2451

**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the earnings )  
and authorized return on equity of )  
Gulf Power Company )  
\_\_\_\_\_ )

Docket No. 990250-EI

In re: Petition by Gulf Power Company )  
for approval of proposed plan for an )  
incentive revenue-sharing mechanism )  
that addresses certain regulatory issues )  
including a reduction to the company's )  
authorized return on equity )  
\_\_\_\_\_ )

Docket No. 990244-EI

Certificate of Service

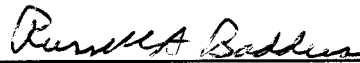
I HEREBY CERTIFY that a copy of the foregoing has been furnished  
this 2nd day of July 1999 by U.S. Mail or hand delivery to the following:

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