

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

VERIZON FLORIDA LLC,

Complainant,

v.

FLORIDA POWER AND LIGHT
COMPANY,

Respondent.

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File No.: EB-14-MD-003

COMMISSION
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RESPONDENT FLORIDA POWER AND LIGHT COMPANY'S
MOTION FOR LEAVE TO FILE REPLY

Respondent Florida Power and Light Company ("FPL"), by and through its attorneys, respectfully submits this Motion for Leave to File Reply and requests that the Bureau grant FPL leave to submit the accompanying Reply in Support of Motion to Establish Case Schedule. In further support hereof, FPL states as follows.

1. FPL filed a Motion for Leave and Motion to Establish Case Schedule on December 4, 2014. Verizon Florida LLC ("Verizon") filed its Opposition to FPL's Motion for Leave to File on December 11, 2014.¹

2. Although nominally styled an opposition to FPL's procedural request for leave, Verizon's opposition makes substantive arguments and factual mischaracterizations which necessitate a reply. In addition, allowing FPL leave to file a reply will provide the Commission with the most complete and fully-developed record on which to base its decisions in this matter.

¹ Verizon did not seek leave to file its Opposition. The Commission's rules provide that in a proceeding under 47 C.F.R. Part, 1, Subpart J, after the complaint, response and reply "no other filings and no motions other than for extension of time will be considered unless authorized by the Commission." 47 C.F.R. § 1.1407(a).

3. Good cause therefore exists to permit the filing and consideration of the accompanying Reply.

For the foregoing reasons, FPL respectfully requests that the Commission grant it leave to file the attached Reply in Support of Motion to Establish Case Schedule.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2014, I caused a copy of the foregoing Respondent's Motion for Leave to be served on the following by hand delivery, U.S. mail or electronic mail (as indicated):

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A handwritten signature in black ink, appearing to read "Rob Gastner", written over a horizontal line.

Robert J. Gastner