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Pensacola, Florida 32520

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ORIGINAL

September 2, 1999

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

Re: Docket Nos. 990250-E1 and 990244-E1

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of Gulf Power Company's Motion for Extension of Scheduled Dates to be filed in the above dockets.

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

Sincerely,

Susan D. Ritenour  
Assistant Secretary and Assistant Treasurer

dhr

Enclosures

cc: Beggs and Lane  
Jeffrey A. Stone, Esquire

AFA	_____
APP	_____
CAF	_____
CMU	_____
CTR	_____
EAG	3
LEG	2
MAS	3
OPC	_____
PAI	_____
SEC	1
WAW	_____
OTH	17 each docket

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RECEIVED  
FLORIDA PUBLIC  
SERVICE COMMISSION

DOCUMENT NUMBER-DATE

10620 SEP-3 99

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: September 3, 1999  
to the Company's authorized return on equity. )  
\_\_\_\_\_ )

ORIGINAL

**GULF POWER COMPANY'S MOTION FOR EXTENSION OF SCHEDULED DATES**

Gulf Power Company ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned counsel, hereby requests an extension of time in which to file its direct testimony and further requests a revision of the schedule of events set forth by the Florida Public Service Commission ("Commission") in Order No. PSC-99-1633-PC0-EI. In support of this motion, the Company states:

1. On July 12, 1999, a Case Assignment and Scheduling Record ("CASR") was issued in Docket 990250-EI establishing a preliminary schedule of events with the following elements:

Description	Due Date
Testimony - Utility	10/22/99
Testimony - Intervenor	11/5/99
Testimony - Staff	11/19/99
Notice of Prehearing and Hearing	12/1/99
Testimony - Rebuttal	12/5/99
Prehearing Statements	12/5/99
Prehearing	1/12/00
Hearing	1/25/00
Transcripts Due	2/9/00
Briefs Due	2/21/00

DOCUMENT NUMBER-DATE

10620 SEP-3 99

FPSC-RECORDS/REPORTING

2. On August 23, 1999, the Commission issued Order No. PSC-99-1633-PC0-EI (“the Procedural Order”) which set forth the following list of dates to govern the key activities of this case:

Description	Due Date
Utility’s and Intervenor’s direct testimony and exhibits	9/20/99
Staff’s direct testimony and exhibits, if any	9/27/99
Rebuttal testimony and exhibits	10/6/99
Prehearing Statements	10/6/99
Prehearing Conference	10/13/99
Hearing	11/1/99
Briefs	11/15/99

3. The new schedule is a dramatic departure from the tentative schedule of events set forth in the July 12, 1999 CASR. In addition to advancing the final hearing by nearly three months, the Procedural Order also compressed the time between key activities. Presently, both Intervenor and Utility testimony are due in less than three weeks. This new schedule presents a significant hardship on the parties with regard to the opportunity to adequately prepare testimony and exhibits in this case.

4. By motion filed on September 1, 1999, the Coalition for Equitable Rates (“Coalition”) advised the Commission that it needed an extension of the deadline for filing direct testimony in order to allow adequate time for preparation of its testimony. In its motion, Coalition asked for a two week extension of the deadlines for all testimony and prehearing statements.

5. Gulf Power also needs additional time in order to prepare its testimony and exhibits. The Company submits that the Coalition’s requested two week extension of the deadline is

modest under the circumstances of this case and should be granted for all parties. Therefore, the Company joins in Coalition's request in this regard.

6. Gulf further submits the current schedule for the prehearing conference and final hearing is not adequate based on the discovery period allowed in the Procedural Order. Under the Procedural Order, all discovery must be completed by October 25, 1999. This deadline is very stringent under the circumstances of this case and falls nearly two weeks after the prehearing conference presently scheduled in this case. Gulf submits that it would be appropriate under the circumstances of this case to hold the prehearing conference after all discovery is complete. Therefore, separate and apart from the request for extension of the deadlines for filing testimony and prehearing statements in these proceedings, Gulf respectfully requests that the final hearing in this case be rescheduled for a date no earlier than the week of November 15, 1999 and that the prehearing conference be rescheduled for November 1, 1999. Gulf further requests that the deadlines for transcripts and briefs be rescheduled as part of the prehearing conference. The new proposed dates for key activities are as follows:

Description	Proposed Date
Utility's and Intervenor's direct testimony and exhibits	10/4/99
Staff's direct testimony and exhibits, if any	10/11/99
Rebuttal testimony and exhibits	10/22/99
Prehearing Statements	10/22/99
Prehearing Conference	11/1/99
Hearing	week of 11/15/99 or later
Transcripts	to be determined at prehearing
Briefs	to be determined at prehearing

WHEREFORE, Gulf Power Company respectfully requests that the dates for filing testimony and prehearing statements be extended as stated herein and further requests that the schedule of events set forth in Order No. PSC-99-1633-PC0-EI be revised as provided herein.

Respectfully submitted this 2<sup>nd</sup> day of September 1999.



**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A BADDERS**

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**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the earnings )  
and authorized return on equity of ) Docket No. 990250-EI  
Gulf Power Company )  
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In re: Petition by Gulf Power Company )  
for approval of proposed plan for an )  
incentive revenue-sharing mechanism ) Docket No. 990244-EI  
that addresses certain regulatory issues )  
including a reduction to the company's )  
authorized return on equity )  
\_\_\_\_\_ )

Certificate of Service

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

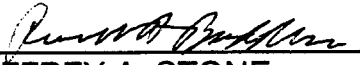
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