

Gulf Power Company
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**ORIGINAL
FILE COPY**

Jack L. Haskins
Manager of Rates and Regulatory Matters
and Assistant Secretary

the southern electric system

January 25, 1994

Mr. Steve Tribble, Director
Director of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee FL 32399-0870

Dear Mr. Tribble: *gss E.L.*

Re: Docket No. XXXXXXXXXX

Enclosed are an original and fifteen copies of Gulf Power Company's Motion for Stay to be filed in the above docket.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Statement in WordPerfect 5.1 format as prepared on a MS-DOS based computer.

Sincerely,

ACK _____
AFA _____ *Jack L. Haskins*
APP _____ *IW*
CAF _____
CMU _____ *Enclosures*
CTR _____
EAG _____ *L*
LEG _____ *10/11*
LIN _____ *6*
OPC _____
FCH _____
SED _____ *1*
WAS _____
OTH _____

"Our business is customer satisfaction"

DOCUMENT NUMBER-DATE
00858 JAN 26 8
FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve)
territorial dispute with Gulf) Docket No. 930885-EU
Coast Electrical Cooperative, Inc.) Filed: Jan. 26, 1994
by Gulf Power Company)
_____)

GULF POWER COMPANY'S MOTION FOR STAY

Gulf Power Company ["Gulf Power", "Gulf", or "the Company"], hereby requests that the Florida Public Service Commission ["Commission"] enter an order staying all activity in the above docket for a period of sixty (60) days in order for the parties to enter into negotiations concerning this territorial dispute. As grounds for this Motion, the Company states:

1. Gulf Power and Gulf Coast Electrical Cooperative, Inc. ["the Cooperative"] have indicated a desire to attempt to negotiate this territorial dispute, so long as the period of negotiations does not work to prejudice the positions taken by either party in this docket. In order to prevent prejudice to either party, the deadlines for pre-filing of testimony and the submission of responses to all pending discovery should be delayed during the period of negotiations.

2. In the interests of efficiency and economy, the Commission should stay these proceedings for a period of sixty (60) days in order to facilitate such negotiations. Such a stay will allow the parties and the Commission Staff to avoid time-consuming, costly, and potentially unnecessary activity before the Commission.

DOCUMENT NUMBER-DATE

00858 JAN 26 84

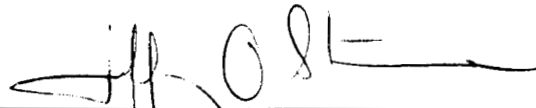
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3. Gulf requests that any order granting the requested stay provide that the stay will automatically expire either at the conclusion of the sixty (60) day negotiation period if no agreement has been reached by such date, or at any time during that sixty (60) day period if either party declares by written notice to the other and to the Commission Staff that such negotiations have reached an impasse. Gulf further requests that, upon expiration of the stay, all dates for pre-filing of testimony and submission of responses to any pending discovery be re-established based on an extension of the original deadlines by the total number of days the proceedings were actually stayed, and that the dates for the hearings and the associated prehearing conference be rescheduled accordingly (or to such later date or dates as may be required by the dictates of the Commission's official calendar).

4. Gulf, through counsel, has discussed the subject matter of this motion with counsel for the Cooperative. Based on these discussions, it is Gulf's understanding that the Cooperative concurs with and supports the request for relief made by this motion.

WHEREFORE, Gulf Power Company requests an order staying these proceedings, and all further activity relating thereto, for a period of sixty (60) days in order to allow negotiations between the parties to this dispute.

Respectfully submitted this 25th day of January, 1994.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. Mail the 25th day of January, 1994, on the following:

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