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April 29, 1998

Ms. Blanca S Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2450 Shumard Oak Blvd.
Tallahassee, Florida 32399

Re: In Re: Petition to Resolve territorial dispute with Clay Electric Cooperative, Inc. in Baker County by Florida Power & Light Company, Docket No. 970512-EU

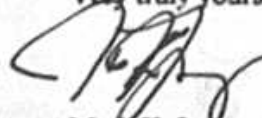
Dear Ms. Bayo:

Please find enclosed the original and fifteen copies of Florida Power & Light Company, Inc.'s Motion for Extension of Time for Transfer of Service for filing in the above referenced docket.

I have enclosed a copy of this letter. Please mark it to indicate that the original was filed and return the copy to me.

Please contact me if you have any questions. Thank you for your assistance in the matter.

Very truly yours,



Mark K. Logan

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG 3 MKL/skb
- LEG 2 Enclosures
- LIN _____
- QPC _____ cc: Robert L. Valdez, FPL
- RCH _____ John Haswell, Esquire
- SEC 1 RECEIVED & FILED
William C. Phillips, General Manager
- WAS _____
- OTH Sandy FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Power & Light)
 Company to Resolve a Territorial Dispute)
 with Clay Electric Cooperative in Baker)
 County)

DOCKET NO. 970512-EU

FILED: April 29, 1998

MOTION FOR EXTENSION OF TIME FOR TRANSFER OF SERVICE

Florida Power & Light Company, Inc. ("FP&L") pursuant to Rule 25-22.037(2)(b), Florida Administrative Code, files this Motion for Extension of Time for Transfer of Service and in support thereof states:

1. On January 28, 1998, the Florida Public Service Commission ("Commission") issued order number PSC-98-0178-FOF-EU which required that FP&L provide permanent electrical service to River City Plastics, Inc., ("River City") as part of a resolution of a territorial dispute between FP&L and Clay County Electric Cooperative, Inc. ("Clay"). The order further provided that permanent service to River City was to be provided by FP&L within four weeks of the issuance of the order and that Clay and FP&L coordinate the transfer of service in order to ensure a minimum of service interruption to the customer. Finally, the order required Clay to remove its distribution facilities from the River City Plastics site at its own expense. Order at page 18.

2. Since the issuance of the Commission's order, FP&L has been informed by River City Plastics that Company plans to continue to use Clay's transformers and other related facilities behind the primary metering point under an existing leasing arrangement with Clay. This decision necessitates that Clay purchase certain voltage regulators and additional transformers in order to accommodate FP&L's primary electric service delivered to the primary metering point. To date, Clay has not installed the equipment necessary for FP&L to provide primary electric service to the

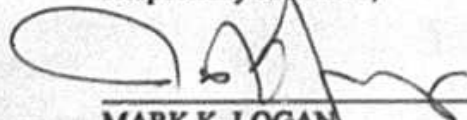
metering point. This situation was communicated to Commission staff via letter dated March 27, 1998, a copy of which is attached as Exhibit 1.

3. Since the March 27, 1998, letter, FP&L has contacted Clay and is authorized to state that Clay anticipates delivery and installation of the necessary transformers and other related equipment by May 18, 1998.

4. FP&L is ready and able to bring primary electric service as required in the January 28, 1998, order to River City Plastics within five (5) days of Clay's installation of compatible facilities (transformers and/or regulators) as well as the removal of Clay's existing overhead primary service to River City Plastics.

5. Based upon the forgoing FP&L respectfully request that the Commission amend order number PSC-98-0178-FOF-EU to state that permanent service to River City Plastics shall be provided within five (5) days of Clay's installation of necessary transformers and other related equipment and the removal of Clay's primary overhead feed service to River City Plastics' facility. FP&L further respectfully suggest that the order require the parties to jointly report back to the Commission in the event that permanent electric service to the River City Plastics' facility is not transferred from Clay to FP&L by July 1, 1998. FP&L is authorized to state that Clay concurs with this request.

Respectfully submitted,



MARK K. LOGAN
Florida Bar No. 0494208
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Patrick M. Bryan, Esquire
Law Department
Florida Power & Light Company, Inc.
700 Universe Blvd.
Juno Beach, Florida 33408

Attorneys for Florida Power & Light
Company, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following on this 29th day of April 1998.

John Haswell, Esquire
Chandler, Lang & Haswell, P.A.
Post Office Box 23879
Gainesville, Florida 32602

William C. Phillips, General Manager
Clay County Electric Cooperative, Inc.
Post Office Box 308
Keystone Heights, Florida 32656-0308

Grace Jaye, Esquire
Robert Elias, Esquire
Legal Division
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399



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March 27, 1998

Grace Jaye, Esquire
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: In Re: Petition of Florida Power & Light Company to Resolve a Territorial Dispute
with Clay Electric Cooperative in Baker County.
Docket No. 970512-EU

Dear Grace:

As you are aware, on January 28, 1998, the Commission issued Order No. PSC-98-0178-FOF-EU resolving the territorial dispute between Florida Power & Light Company ("FP&L") and Clay Electric Cooperative, Inc. ("Clay") in favor of FP&L. That order requires FP&L to provide service to the disputed customer (River City Plastics) within four weeks of the effective date of the order. Factoring in the time allowed for potential reconsideration and/or appeal of the above referenced order, FP&L planned to have service delivered to River City Plastics by April 1, 1998. However, since the issuance of the order there have been several occurrences which will impact the date of actual delivery of electric service to River City Plastics.

During FP&L's post-order meetings with River City Plastics, FP&L was informed by River City Plastics that they desired to continue to use Clay's transformers and other related facilities behind the primary metering point under an existing leasing arrangement. As you will recall, these facilities were part of the matters considered by the Commission in denying FP&L's motion to award interim service (Order No. PSC-97-1235-PCO-EI, August 4, 1997). One of the issues raised by FP&L in that motion was the compatibility of transformers used by Clay with those used by FP&L.

The decision of River City Plastics and Clay to continue the leasing arrangement necessitates the purchase by Clay of certain voltage regulators and additional transformers in order to accommodate FP&L's electrical service delivered to the primary metering point. Clay has informed us that they ordered this equipment on March 11, 1998, and do not anticipate delivery until some ten weeks later (approximately May 20, 1998).

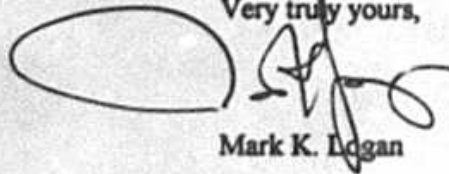
Grace Jaye, Esquire
March 27, 1993
Page 2

FP&L cannot start building its overhead (secondary feed) service until River City Plastics' equipment (leased Clay equipment) is compatible with FP&L's primary feed service. Additionally, we are still waiting for Clay to provide FP&L with the cost to purchase their existing overhead service or remove the same in order for FP&L to build the overhead service required to provide River City Plastics with FP&L's secondary service.

We do not believe that the above referenced occurrences are within the control of FP&L. FP&L The Company remains committed to bringing quality dual feed service to River City Plastics at the earliest feasible time.

Please feel free to contact either myself or Bob Valdez (305-552-4775) regarding any questions you may have concerning this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark K. Logan", is written over a large, empty oval shape. The signature is cursive and somewhat stylized.

Mark K. Logan

MKL/skb

cc: Jim Breman, PSC staff
Robert L. Valdez, FP&L
Mr. W. G. Walker, III
Bill Feaster
John Haswell, Esquire
Wilton Miller, Esquire