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DAVID J. BARBERIE

October 10, 1995

Ms. Blanca Bayo
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399

RE: Docket No. ~~95088-23~~

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen (15) copies of Gulf Power Company's Motion for Extension of Time.

Please mark the enclosed extra copy of this letter with the date and time that the material was accepted in your office for filing, and return same to the undersigned. Thank you for your assistance in this matter.

Very truly yours,

Russell A. Badders

Russell A. Badders,
For the Firm

- ACK
- AEA
- APP *Heltzer*
- CAF
- CMU
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- JAS/lb*
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- OPC
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve) Docket No. 930885-EU
territorial dispute with) Filed: October 11, 1995
Gulf Coast Electric)
Cooperative, Inc.)
by Gulf Power Company)
_____)

MOTION FOR EXTENSION OF TIME

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 the Company's Response to Gulf Coast's Motion for Stay Pending Judicial Review. In support of this motion the Company states:

1. On September 25, 1995, attorneys for Gulf Coast Electric Cooperative, Inc. filed a Motion for Stay Pending Judicial Review in Docket 930885-EU.

2. Gulf Power Company was to file its Response to Gulf Coast's Motion for Stay Pending Judicial Review on or before October 9, 1995. However, due to hurricane Opal coming ashore on October 4, 1995, in Gulf Power's service territory just East of Pensacola, the site of the corporate office of Gulf Power Company and the office of Beggs and Lane, Gulf Power and its attorneys were unable to meet this deadline. The Company and its attorneys were forced to attend to hurricane related matters and were unable to devote time to this matter. The loss of electricity by the

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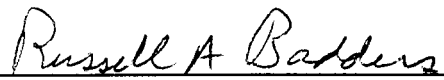
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FPSC-RECORDS/REPORTING

undersigned attorney until Saturday, October 7, 1995, further contributed to our inability to file our response to Gulf Coast's motion. These circumstances were unavoidable and unforeseeable.

3. Contemporaneous with the filing of this motion Gulf Power is filing its Response to Gulf Coast's Motion for Stay Pending Judicial Review.

WHEREFORE, Gulf Power Company respectfully requests that the date for filing the Company's Response to Gulf Coast's Motion for Stay Pending Judicial Review be extended to permit the filing of said response contemporaneous with this motion.

Respectfully submitted this 10th day of October, 1995.



JEFFREY A. STONE
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Attorneys for Gulf Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on this 10th day of October, 1995 by U.S. Mail to the following:

Mr. John H. Haswell, Esquire
Chandler, Lang & Haswell, P.A.
211 Northeast First Street
Gainesville, Florida 32506

Mr. J. Patrick Floyd, Esquire
408 Long Avenue
Port St. Joe, Florida 32456-0950

Mr. Hubert Norris
Gulf Coast Electrical Cooperative, Inc.
Post Office Box 220
Wewahitchka, Florida 32456

Mr. Martha Carter Brown, Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
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