

LAW OFFICES
CHANDLER, LANG & HASWELL, P.A.
POST OFFICE BOX 23879
GAINESVILLE, FLORIDA 32602-3879

ORIGINAL
FILE COPY

JAMES F. LANG
JOHN H. HASWELL
C. WHARTON COLE

TELEPHONE 352/376-5226
TELECOPIER 352/372-8858
211 N.E. FIRST STREET
GAINESVILLE, FL 32601-5367

WILLIAM H. CHANDLER
1920-1992

January 27, 1997

Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oaks Boulevard
Tallahassee, Florida 32301

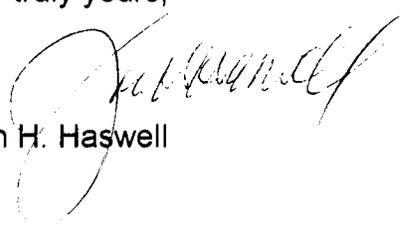
RE: Petition to Resolve Territorial Dispute with
Gulf Coast Electric Cooperative, Inc.
and Gulf Power Company
FPSC Docket Number: 93-0885-EU

Dear Ms. Bayo:

I am enclosing herewith the original and fifteen (15) copies of a Motion and Stipulation for Continuance of Final Hearing by Gulf Power Company and Gulf Coast Electric Cooperative, Inc.'s for filing.

Please call me if you have any questions.

Very truly yours,


John H. Haswell

ACK _____

AFA _____

APP 1

CAF _____

CMU _____ JHH/lez
Enclosures

CTR _____

EAG cc: J. Patrick Floyd, Esquire
LEG 1 Roy Barnes

LIN 3

OPC _____

RCH _____

SEC 1

WAS _____

OTH _____

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DOCUMENT NUMBER-CASE
93-0885-EU-015
REC'D-PROCESSED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition to resolve territorial dispute) Docket No. 930885-EU
with Gulf Coast Electric Cooperative, Inc.)
by Gulf Power Company)
_____)

**MOTION AND STIPULATION FOR CONTINUANCE
OF FINAL HEARING BY GULF POWER COMPANY AND
GULF COAST ELECTRIC COOPERATIVE, INC.**

Gulf Power Company ("Gulf Power") and Gulf Coast Electric Cooperative, Inc. ("Gulf Coast") by and through their undersigned attorneys, pursuant to Rule 25-22.041, Florida Administrative Code, do hereby stipulate to the entry of an order continuing the hearing of this case, and do also move for the entry of an Order of Continuance, and in support hereof state as follows:

1. This case is currently set for a two day final hearing starting February 11, 1997, and continuing through February 12, 1997.
2. Both Gulf Power and Gulf Coast regard this phase of the proceeding, which was directed by the Commission in Orders No. 95-0271-FOF-EU, 95-0913-FOF-EU, 96-1191-PCO-EU and 96-1331-PCO-EU, to be of great public interest, not only to the customers of each utility, but also to the general body of rate payers of the State of Florida.
3. This is the first proceeding where the Commission has indicated that it is considering establishing a territorial boundary between the two utilities in South Washington County and Bay County, where the facilities of the two utilities are in close proximity, are co-mingled, or where further uneconomic duplication is likely to occur.
4. Both Gulf Power and Gulf Coast have vigorously pursued discovery from

each other and have responded to extensive discovery quests from the Staff of the Commission.

5. The latest round of discovery between the utilities has produced thousands of pages of documents that counsel and the witnesses for both utilities must review prior to the hearing. Gulf Power and Gulf Coast last exchanged voluminous documents on January 24, 1997.

6. The Staff has propounded a third set of interrogatories to both utilities, filed on December 13, 1996, which were received by the utilities on or about December 15, 1996, just prior to the Christmas holidays. These interrogatories are numbered 22 through 97, and many of them have subparts. The total number including subparts exceeds 100 requests for data and information. While Gulf Power and Gulf Coast have done their best to comply with the Staff's request, it is unlikely that their responses can be completed prior to January 31, 1997, the Friday before the prehearing conference to be held on February 3, 1997. It is also likely that one or both utilities will not be able to provide all of the information requested in the interrogatories from Staff by the scheduled hearing date.

7. Staff's third set of interrogatories have required essentially the production of documents (maps) that did not exist; hence both utilities have been required to create a new set of maps with a significant amount of data that requires physical field inspections of the facilities to be located on each map. The volume of maps requested and the work required have caused the personnel of both utilities (those who are witnesses in this case) to divert their attention from preparing for their direct and cross examination, review of the existing documents, depositions, and other discovery, to the task of completing the maps, conducting field work, and researching their records to answer the 75 interrogatories.

8. Both utilities realize that the submission of their responses to Staff's third set of interrogatories on or after January 31, 1997, will not allow the parties or the Staff sufficient time to analyze, review, and in some cases, to question the documents, maps, and data provided, prior to the hearing scheduled for February 11 and 12, 1997.

9. It is in the public interest that Gulf Power, Gulf Coast, and the Staff be thoroughly prepared to present this case to the Commission, particularly due to the fact that for the first time the Commission is considering establishing a territorial boundary between the two utilities as a result of their inability to enter into a territorial agreement.

10. Gulf Power and Gulf Coast, therefore, respectfully submit that they need additional time to fully answer the latest Staff interrogatories, to fully review the answers, maps and data yet to be provided, and to then focus on their preparation for the hearing. The parties further submit that additional time will allow the Staff to fully and adequately review the documents, maps and answers submitted and to be prepared for the cross examination of the parties' witnesses at the hearing, as well as to fully prepare the Staff's witness for the hearing.

11. The parties are not requesting that general discovery be reopened. Plainly and simply, the parties need additional time to complete what has already been requested, to evaluate and perhaps conduct discovery limited to each other's responses and to then complete preparations for a hearing.

12. The parties, therefore, respectfully request and stipulate to a continuance of the final hearing of this cause and request that it be reset for a time in the future that will allow both utilities to fully answer the interrogatories and complete preparations for the hearing. In addition, if the continuance is granted, Gulf Power and Gulf Coast request that

the final hearing of this cause and request that it be reset for a time in the future that will allow both utilities to fully answer the interrogatories and complete preparations for the hearing. In addition, if the continuance is granted, Gulf Power and Gulf Coast request that the hearing be set for three days, due to the large number of witnesses to be heard.

13. The parties hereto further request that the Commission first grant the continuance of the February 11 and 12, 1997 dates, and then utilize the time available at the prehearing conference on February 3, 1997, to inquire of the parties as to how much time each believes is reasonably necessary. The parties represent that they each will, between now and February 3, 1997, use their best efforts to accurately assess the additional time needed. If the hearing officer had, at that time, access to the Commission's calendar, all participants in this cause may then be able to agree on a rescheduled date.

Respectfully submitted,



Jeffrey A. Stone, Esquire
Florida Bar No.: 325953
Russell Badders, Esquire
Florida Bar No.: 7455
Beggs & Lane
Post Office Box 12950
Pensacola, Florida 32576-2950
Attorneys for Gulf Power Company



John H. Haswell, Esquire
Florida Bar No.: 162536
Chandler, Lang & Haswell, P.A.
Post Office Box 23879
Gainesville, Florida 32602

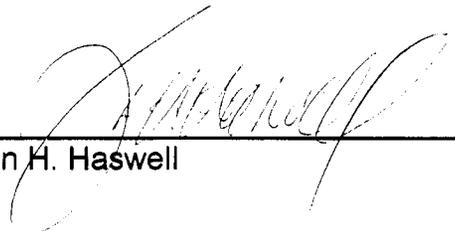
J. Patrick Floyd, Esquire
408 Long Avenue
Port St. Joe, Florida 32456
Attorneys for Gulf Coast Electric
Cooperative, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. mail to the following:

Vicki Johnson, Esquire
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

this 27th day of January, 1997.



John H. Haswell