LAW OFFICES

CHANDLER, LANG & HASWELL, P.A.

POST OFFICE BOX 23879

GAINESVILLE, FLORIDA 32602-3879

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

September 12, 1996

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 for Continuance by Gulf Coast Electric Cooperative, Inc. for filing.

Please call me if you have any questions.

Very truly yours,

John H. Haswell

JHH/lez

Enclosures

J. Patrick Floyd, Esquire

Roy Barnes

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve territorial dispute with Gulf Coast Electric Cooperative, Inc.)	DOCKET NO.	930885-EU
by Gulf Power Company))		
)		

MOTION FOR CONTINUANCE BY GULF COAST ELECTRIC COOPERATIVE, INC.

Gulf Coast Electric Cooperative, Inc. (GCEC) by and through its undersigned attorneys respectfully requests an extension of the dates for filing direct, staff and rebuttal testimony, and the deadline for discovery in the following respects:

	Current Due Date	Requested Due Date
Direct Testimony	October 1, 1996	October 15, 1996
Staff Testimony	November 1, 1996	November 15, 1996
Rebuttal Testimony	December 6, 1996	December 20, 1996
Discovery Deadline	January 10, 1997	January 14, 1997

GCEC requests these extensions to allow its expert witnesses sufficient time to evaluate the data and maps submitted to the Commission for inclusion in this case. Following the hearing on July 29, 1996, GCEC pointed out to Staff that it wished to include additional maps of the disputed area not listed by Staff, and it subsequently filed such maps. The meeting was staffed to review the company filings is not scheduled until September 19, 1996. GCEC needs the additional time after the September 19, 1996 meeting to focus and develop its testimony based on the matters discussed at the September 19, 1996 meeting.

DOCUMENT NUMPER-DATE

GCEC has discussed this extension with counsel for Gulf Power Company and can represent to the Commission that Gulf Power has no objection to these extensions of time.

Respectfully submitted,

John H. Haswell, Esquire Florida Bar No.: 162536

Chandler, Lang & Haswell, P.A.

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Post Office Box 23879 Gainesville, Florida 32602

(352) 376-5226

(352) 372-8858 - facsimile

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

CERTIFICATE OF SERVICE

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

Vicki Johnson, Esquire Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0863 Jeffrey A. Stone Beggs & Lane Post Office Box 12950 Pensacola, Florida 32576 Attorneys for Gulf Power Company

this <u>12</u> day of September, 1996.

John H. Haswell