ERIC ASH JODY LANE BROOKS WILLIAM G. CAPKO BETH ANN CARLSON MICHELLE DIFFENDERFER ROBERT P. DIFFENDERFER KENNETH W. DODGE AMY M. DUKES BRENNA MALOUF DURDEN WAYNE E. FLOWERS JOHN W. FOREHAND WALTER E. FOREHAND



MELISSA GROSS-ARNOLD KEVIN S. HENNESSY LAURA L. JACOBS R. STEVEN LEWIS TERRY E. LEWIS JAMES W. LINN ANNE LONGMAN G. STEPHEN MANNING DAVID E. RAMBA KENNETH G. SPILLIAS EDWIN A. STEINMEYER GLENN E. THOMAS STEPHEN A. WALKER

TALLAHASSEE

REPLY TO:

September 4, 2001

Via Hand Delivery

Public Employees Relations Commission Records Clerk 2549 Shumard Oak Boulevard Tallahassee, Florida 32399

> Re: In Re: Territorial Dispute Between West Florida Electrical Cooperative Association, Inc. and Gulf Power Company in Washington County, Florida, Docket No. 010441-EU

Dear Sir or Madam:

We represent Florida Gas Transmission Company ("FGT"), which is not a party to the above styled action, but has been served with a subpoena by West Florida Electrical Cooperative Association. Attached for filing are FGT's original Motion to Quash Subpoena or for Protective Order, Memorandum in Support of said Motion, and Motion for Expedited Consideration. Fifteen (15) copies are also provided as required. Should you have any questions regarding these filings, or this matter, please contact me.

Sincerely,

Motion to Quash = 10947-01 Memorandum = 10948-01 Motion for Expedited = 10949-01

ore 9/13/01

Jacksonville Office 9428 Baymeadows Road Suite 625 Jacksonville, Florida 32256 (904) 737-2020 • Fax (904) 737-3221

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SER



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Territorial Dispute Between West Florida Electrical Cooperative Association, Inc. and Gulf Power Company in Washington County, Florida. Docket No.: 010441-EU

Date Filed: September 4, 2001

MOTION FOR EXPEDITED CONSIDERATION

Florida Gas Transmission Company ("FGT"), files this Motion for Expedited Consideration with regard to its Motion to Quash Subpoena or for Protective Order, filed this date and states:

1. FGT has filed a Motion to Quash with regard to a Subpoena for Deposition Duces Tecum by West Florida Electrical Cooperative Association, Inc. ("WFEC"). FGT has filed this Motion in order to protect its legal rights, and is concerned that it not delay the underlying proceeding. It therefore asks that its Motion to Quash be decided as expeditiously as possible, and will be available for hearing as needed.

Respectfully submitted this day of September, 2001.

Anne Longman

Florida Bar No. 0287547

Edwin A. Steinmeyer

Florida Bar No. 0883920

John W. Forehand

Florida Bar No. 0979813

LEWIS, LONGMAN & WALKER, P.A.

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DOCUMENT NUMBER-DATE

10949 SEP-45

FPSC-COMMISSION CLERK

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served via United States Mail and facsimile transmission to John H. Haswell, Chandler, Lang, Haswell & Cole, P.A., 211 N.E. 1st Street, Gainesville, Florida 32602, and Frank E. Bondurant, Post Office Box 854, Marianna, Florida 32447, this day of September, 2001.