

Before the
Federal Communications Commission
Washington, DC 20554

BELLSOUTH TELECOMMUNICATIONS,*
LLC D/B/A AT&T FLORIDA *

Complainant, *

v. *

FLORIDA POWER & LIGHT
COMPANY, *

Respondent. *

Proceeding No.: 20-214
File No.: EB-20-MD-002

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**FLORIDA POWER & LIGHT COMPANY'S MOTION
FOR EXTENSION OF TIME**

Pursuant to Rule 1.46, Respondent, Florida Power & Light Company ("FP&L"), by and through its attorneys, respectfully submits this motion requesting an extension to file its Answer and Brief. In further support hereof, FP&L states as follows.

1. BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T") filed the complaint in this matter on July 6, 2020. The Federal Communications Commission (the "Commission" or "FCC") provided a Notice of Complaint to FP&L on July 9, 2020 ("Notice"). Pursuant to § 1.726, FP&L's answer was due August 7, 2020. Pursuant to § 1.728, AT&T's reply was due August 17, 2020.

2. The Commission's complaint procedure rules allow for motions for extensions of time. *See* 47 C.F.R. § 1.46 & § 1.729.

3. FP&L filed a Motion for Adjustment of Deadlines on July 24, 2020.

4. By letter dated July 27, 2020, the Commission's Enforcement Bureau ("Bureau") granted the Motion for Adjustment of Deadlines, but adjusted the deadlines as reflected in the

AT&T Response to Interrogatories	October 5, 2020	November 6, 2020
Reply	October 6, 2020	November 3, 2020
Joint Statements	October 30, 2020	November 13, 2020
Status Conference		
Briefing / Discovery Deadline	November 25, 2020	November 30, 2020

9. These proposed adjustments extends the last filing date 69 days beyond the date contemplated by the Scheduling Order. As a result, FP&L requests that the 270-day review period for final action on the Complaint be extended to June 10, 2021. The adjusted schedule proposed above still allows more than four (4) months for the Commission to resolve the complaint after the conclusion of all discovery and briefing.³

10. The undersigned counsel has communicated with counsel for AT&T, and AT&T does not oppose the schedule adjustment requested in Paragraph 8 herein. In fact, some of the proposed adjusted deadlines reflect input by AT&T to avoid known conflicts for AT&T and its counsel.

³ FP&L requests that the Commission and AT&T please note that its service area is in the middle of hurricane and tropical storm season. The proposed schedule herein and FP&L's ability to address this matter and comply with the applicable schedule will be directly affected by any hurricanes or major storms that threaten or impact its service area and require the deployment of critical FP&L personnel for storm preparation and storm restoration duties. In that regard, FP&L reserves the right to seek further modification of the schedule in this matter in the event FP&L's territory is impacted by any future major weather events.

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2020, I caused a copy of the foregoing Motion for Extension of Time to be served on the following by hand delivery, U.S. mail or electronic mail (as indicated):

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