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August 19, 1992

VIA HAND DELIVERY

Mr. Steven C. Tribble, Director
Division of Records and Reporting
FLORIDA PUBLIC SERVICE COMMISSION
101 East Gaines Street
Tallahassee, Florida 32301

Re: Territorial Dispute Between Okefenoke Rural Electric
Membership Corporation and The Jacksonville Electric
Authority of the City of Jacksonville, in Duval County;
Docket No. 911141-EU

Dear Mr. Tribble:


Enclosed for filing in the above styled case is the original and fifteen (15) copies of a revised page 24 of OREMC's Brief. This page should be used to replace page 24 of OREMC's Brief as filed with the Commission on July 17, 1992. Copies of this letter and the revised page 24 have been served on all parties of record in this docket.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG JJW/bgs

Thank you for your assistance in connection with this matter.

Yours truly,


J. JEFFREY WAHLEN

- LEG 1
 - LIN 3
 - OPC _____
- cc: Martha Carter Brown, w/encl., via Hand Delivery
Kenneth A. Hoffman, w/encl.
Bruce Page, w/encl.

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09292 AUG 19 1992

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Territorial Dispute Between)
Okefenoke Rural Electric Membership)
Corporation and the Jacksonville)
Electric Authority of the City of)
Jacksonville, in Duval County)

Docket No. 911141-EU

Filed: August 19, 1992

BRIEF OF

OKEFENOKE RURAL ELECTRIC MEMBERSHIP CORPORATION

Revised Page 24

DOCUMENT NUMBER-DATE

09292 AUG 19 1992

FPSC-RECORDS/REPORTING

Middleton), JEA has over the years encroached on the areas historically served by OREMC by systematically building duplicative facilities and serving customers when it was "practical and economical" for JEA to do so. (Tr. 308, Ferdman).

A particularly vivid example of this practice is the Holiday Inn episode wherein four new spans of three-phase 2ACSR wire on concrete poles, a new riser pole, 600 feet of three-phase underground primary cable, one 1000 KVA transformer, and one 1500 KVA transformer, were installed so JEA could provide service to the Holiday Inn. (Tr. 189-190, Dew). JEA began providing service to the Holiday Inn on November 25, 1991, (Tr. 280, Ferdman) without OREMC's permission (Tr. 58, Page), even though OREMC had been providing service to the Holiday Inn for over 20 years. (Tr. 137, Middleton). The equipment installed to serve the Holiday Inn duplicated OREMC's existing facilities. The cost of these duplicative facilities to JEA was approximately \$53,000 (Tr. 303, Ferdman).

Issue 10. What is the expected customer load and energy growth in the disputed area and surrounding areas?

The issue of specific load growth rates is not an issue in this case; however, future growth in the disputed area is an important issue in this case. (Tr. 220, Dew). It is generally recognized that the growth in northern Duval County will increase now that the Dames Point Bridge has been completed. (Tr. 260, Wrightson). OREMC has plans and the ability to meet expected customer load and energy growth in the disputed areas. (Tr. 193-


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the Revised Page 24 of OREMC's Brief have been furnished by U.S. Mail or Hand Delivery* this 19th day of August, 1992 to the following:

Martha Carter Brown*
Florida Public Service Commission
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