

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

VERIZON FLORIDA LLC,)	
)	
Complainant,)	Docket No. 15-73
)	File No. EB-15-MD-002
v.)	
)	
FLORIDA POWER AND LIGHT)	Related to
COMPANY,)	Docket No. 14-216
)	File No. EB-14-MD-003
Respondent.)	

**RESPONDENT FLORIDA POWER AND LIGHT COMPANY'S
MOTION FOR LEAVE TO FILE**

Respondent Florida Power and Light Company ("FPL"), by and through its attorneys, respectfully submits this Motion for Leave to File and requests that the Bureau grant FPL leave to submit the accompanying Motion to Allow Discovery and Extend Time to Respond to the Complaint, which asks that the Bureau: (i) allow the parties to propound and serve discovery in an expedited fashion in order to provide for a complete and accurate record on which the Commission can base its decision in this matter; and, (ii) extend the time for FPL to file a response to the Complaint from April 13, 2015 to June 12, 2015.

1. As more fully discussed in the attached Motion to Allow Discovery and Extend Time to Respond to the Complaint, FPL files this motion in an effort to help create an efficient but thorough process to develop a complete and accurate record in this proceeding. Based on its preliminary review to date of the Complaint, FPL believes that limited discovery will be required

to respond to the specific factual assertions and analyses in the Complaint and provide a complete record for the Commission.

2. In the accompanying Motion to Allow Discovery and Extend Time to Respond to the Complaint, FPL requests that the Commission extend the time for FPL to file a response to the Complaint from April 13, 2015 to June 12, 2015. A reasonable extension such as this will allow time for Verizon to file a reply. Further, this extension will allow time for the Commission to issue a decision prior to September 2015, which is the month in which the Florida court has set the related state court action for trial, as more fully explained in the attached motion.

3. Good cause therefore exists to permit the filing and consideration of the Motion to Allow Discovery and Extend Time to Respond to the Complaint.

For the foregoing reasons, FPL respectfully requests that the Commission grant it leave to file the attached Motion to Allow Discovery and Extend Time to Respond to the Complaint.

Respectfully submitted,



Charles A. Zdebski

Gerit F. Hull

Jeffrey P. Brundage

ECKERT SEAMANS CHERIN & MELLOTT, LLC

1717 Pennsylvania Avenue, N.W.

Suite 1200

Washington, D.C. 20006

(202) 659-6600

czdebski@eckertseamans.com

ghull@eckertseamans.com

jbrundage@eckertseamans.com

Counsel to Florida Power and Light Company

Dated: April 1, 2015

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2015, I caused a copy of the foregoing Respondent's Motion for Leave to be filed via the Federal Communications Commission's Electronic Comment Filing System and to be served on the following (service method indicated):

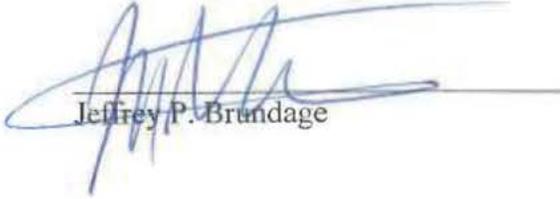
Christopher S. Huther, Esq.
Claire J. Evans, Esq.
Wiley Rein LLP
1776 K Street, N.W.
Washington, DC 20006
chuther@wileyrein.com
cevens@wileyrein.com
(via email)
Attorneys for Verizon Florida LLC

William H. Johnson
Katharine R. Saunders
Roy E. Litland
VERIZON
1320 N. Courthouse Road, 9th Floor
Arlington, VA 22201
will.h.johnson@verizon.com
katharine.saunders@verizon.com
roy.litland@verizon.com
(via email)

Christopher Killion, Division Chief
Rosemary McEnery, Deputy Division Chief
Lia Royle, Commission Counsel
Federal Communications Commission
Enforcement Bureau
Market Disputes Resolution Division
445 12th Street, SW
Washington, DC 20554
(via email and hand delivery)

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426
(via U.S. Mail)

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
(via U.S. Mail)



Jeffrey P. Brundage