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February 7, 1992

## BY HAND-DELIVERY

Ms. Carol Browner, Secretary  
c/o Office of General Counsel  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road, Room 654  
Tallahassee, Florida 32399-2400

Re: Florida Power & Light Company  
Lauderdale Power Plant  
Air Operation Permit No. AO 06-199041

Dear Secretary Browner:

On September 26, 1991, Florida Power & Light Company (FPL) received the above referenced air operation permit for its Lauderdale Power Plant, located in Broward County, Florida. The permit was issued by the Department's Southeast Florida District office and was signed by J. Scott Benyon, Director of District Management. By order dated January 17, 1992, FPL was granted an extension of time to and including February 7, 1992 in which to file a petition for administrative proceedings regarding the permit.

On behalf of FPL, I hereby request, pursuant to F.A.C. Rule 17-103.070, an extension of an additional sixty (60) days to, and including, April 7, 1992, in which to file a petition for administrative proceedings regarding the permit. As good cause for granting the request for extension of time for filing, FPL states the following:

1. The permit contains thirty-one (31) specific conditions, several of which appear to warrant clarification or correction.

2. An FPL representative has discussed the conditions in question with appropriate Department staff and submitted

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a letter regarding the same to Ms. Stephanie Brooks of the Southeast District office on December 2, 1991.

3. It is FPL's understanding that one of its suggested changes to the permit may require amendment of a condition in the underlying air construction permit (Permit No. AC 06-179848). Representatives of FPL intend to meet with staff of the Department's Bureau of Air Regulation in the near future to discuss this matter.

This request is filed simply as a protective measure to avoid waiver of FPL's right to challenge the permit as issued. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to initiate formal administrative proceedings.

I hereby certify that Mr. Dan MacDougall, a representative of FPL, has contacted Ms. Stephanie Brooks of the Southeast District office, and that she did not agree to the grant of this request.

I hereby request that you formally extend the time for filing a petition for administrative proceedings in regard to Department air operation permit AO 06-199041 to and including April 7, 1992.

Respectfully submitted,

*Peter C. Cunningham*  
Peter C. Cunningham *YCB*

/kkm:FPLLPPext

cc: Clair Fancy  
Stephanie Brooks  
Pat Comer, Esq.  
Dan MacDougall  
Elsa Bishop