JACK SHREVE

PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL



c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

May 13, 1996

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

RE: Docket No. 951056-WS

Dear Ms. Bayo:

Enclosed for filing in the above-captioned proceeding on behalf of the Citizens of the State of Florida are the original and 15 copies of the Motion for Extension of Time to File Testimony.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Ou C. Mu

Stephen C. Reilly
Associate Public Counsel

ACK			
AFA	2	SCR/bgm Enclosur	es
APP		ule:	
CAF		erell .	
CML	J		
CTR			
EAG			
LEG			
LIN		التغييس	RECEIVED & FILED
OP	C		
RC	H		EESC BUREAU OF RECORDS
SE	C	1.	- That of Records

DOCUMENT NUMBER DATE

05389 MAY 138

FPSC-NECTHOS/PEPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Application of PALM COAST Docket No. 951056-WS UTILITY CORPORATION for Increased Filed: May 13, 1996 Rates in Flagler County, Florida

CITIZENS' MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY

The Citizens of the State of Florida ("Citizens"), by and through their undersigned attorney, file this motion for extension of time to file testimony, and state:

- Order No. PSC-96-0577-PCO-WS Establishing Procedure, issued in this docket, requires the Citizens to file their prefiled direct testimony on Wednesday, May 15, 1996.
- 2. Counsel for the Citizens and both consultants that will be used by the Citizens in this docket were extensively and continuously involved in the almost 2 weeks Southern States Utilities' hearing, which was concluded late Friday, May 10, 1996. The demands placed upon counsel and the consultants during the extensive hearing compromises their ability to file timely prefiled direct testimony in this docket.
- 3. An extension of 7 days will greatly assist the Citizens in their effort to more completely identify the issues that will be disputed in this proceeding. The more complete identification of these issues will assist all of the parties and the Commission to have a more productive hearing for this docket.

- 1 -

4. The Citizens have discussed this motion with Counsel for

Palm Coast Utility Corporation (PCUC) and the Commission's Staff. Neither expressed objections to this motion, except that PCUC's position is based upon the Commission granting it an additional 7 days within which to file its rebuttal testimony.

WHEREFORE, the Citizens respectfully request the Commission to grant a 7 day extension of time within which to file their prefiled direct testimony in this docket.

Respectfully submitted,

Stephen C. Reilly Associate Public Counsel

Office of Public Counsel
The Florida Legislature
111 West Madison St., Rm. 812
Tallahassee, FL 32399-1400

(904) 488-9330

Attorney for the Citizens of the State of Florida

CERTIFICATE OF SERVICE DOCKET NO. 951056-WS

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail to the following parties on this 13th day of May, 1996.

B. Kenneth Gatlin
Gatlin, Woods & Carlson
The Mahan Station
1709-D Mahan Drive
Tallahassee, FL 32308

Jim Martin P.O. Box 351541 Palm Coast, FL 32135 Scott Edmonds, Esq.
Division of Legal Services
Fla. Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Manuel D. Rivera 6 Bowman Place Palm Coast, FL 32137

Stopben C. Reilly

Associate Public Counsel