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HAND DELIVERY

October 10, 2002

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

Re:

Docket 020233-EI

Supplement to Motion for Extension of Time

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and fifteen copies of FMPA's Supplement to Motion for Extension of Time. Also enclosed is a diskette containing an electronic version of the filing in WordPerfect format.

Sincerely yours,

Jody Lamar Finklea

JLF/taf Enclosures

cc: as noted on Certificate of Service

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of GridFlorida) ·	
Regional Transmission)	DOCKET NO. 020233-EI
Organization (RTO) Proposal)	FILED: October 10, 2002
)	

SUPPLEMENT TO MOTION FOR EXTENSION OF TIME

The Florida Municipal Power Agency (FMPA), by and through undersigned counsel, hereby files this Supplement to Motion for Extension of Time and states as follows:

- 1. One October 9, 2002, FMPA filed its Motion for Extension of Time, and stated that no party other than FIPUG (FIPUG supports the Motion) had responded to FMPA regarding its position on the Motion. That was an accurate statement at the time of filing the Motion.
- 2. Since then, several parties have contacted FMPA regarding their position on the Motion. FMPA is authorized to represent the positions of those parties as follows:
 - Mirant Americas Development, Inc. and Calpine Corporation support the Motion.
 - The Florida Municipal Group (City of Tallahassee, Lakeland Electric,
 Gainesville Regional Utilities, and Kissimmee Utility Authority) have no objection to the Motion.
 - c. Seminole Electric Cooperative supports the Motion.
 - d. Florida Power & Light, and Tampa Electric Company do no object to the Motion, provided the GridFlorida Companies are granted a commensurate extension until October 25, 2002, for the filing of rebuttal testimony and exhibits regarding the proposed market design aspects of the GridFlorida RTO.
 - e. Florida Phosphate Council supports the Motion.

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- f. Florida Industrial Cogeneration Association supports the Motion.
- g. Solid Waste Authority of Palm Beach County supports the Motion.
- h. JEA does not object to the Motion, provided that whatever testimony and exhibits that could be filed in response or rebuttal to any testimony filed on October 16, 2002 (assuming FMPA's Motion is granted and the Commission sets October 16 as the date for filing testimony and exhibits previously due on October 11, 2002, and October 14, 2002) are not due prior to October 23, 2002.
- i. Office of Public Counsel does not object to the Motion.
- j. Florida Power Corporation does not object to the Motion.
- k. Reliant Energy supports the Motion.
- Thomas P. Twomey and Genevieve E. Twomey, Buddy L. Hansen, Louis
 D. Putney, and Sugarmill Woods Civic Association, Inc. do not object to the Motion.

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RESPECTFULLY SUBMITTED this Tenth (10th) day of October, 2002.

FREDERICK M. BRYANT General Counsel

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Attorney I

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CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing SUPPLEMENT TO MOTION FOR EXTENSION OF TIME was furnished to the parties on the attached Service List via electronic mail on this Tenth (10th) day of October, 2002.

JODY LAMAR FINKLEA

Florida Bar No. 0336970

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Reliant Energy Power Generation, Inc. Michael Briggs 801 Pennsylvania Avenue, Suite 620 Washington, DC 20004

Rutledge Encina, et al. Kenneth Hoffman PO Box 551 Tallahassee, FL 32302-0551

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Solid Waste Authority Dr. Marc C. Bruner 7501 North Jog Road West Palm Beach, FL 33412

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