Electronic Filing - IOUs' Joint Motion for Enlargement of Time

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Sent:	Monday, December 10, 2007 9:56 AM
То:	Filings@psc.state.fl.us
Cc:	Wade Litchfield; Alvin Taylor; Bryan Anderson; David Gammon; David McCary; James Brew; Jim Beasley; John Burnett; Jon Moyle; Karin Torain; Lee Willis; Lisa Stright; Paula Brown; Richard Zambo
Subject:	Electronic Filing - IOUs' Joint Motion for Enlargement of Time
Attachmen	ts: Joint Motion.pdf
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- c. Document being filed on behalf of Tampa Electric Company, Progress Energy Florida, and Florida Power & Light Company.
- d. There are a total of 3 pages.
- e. The document attached for electronic filing is the IOUs' Joint Motion for Enlargement of Time.

(See attached file: Joint Motion)

Thank you for your assistance in this matter.

Pam L. Keillor Assistant to Susan F. Clark and Travis L. Miller Radey Thomas Yon & Clark, P.A. Post Office Box 10967 (32302) 301 South Bronough Street, Suite 200 Tallahassee, Florida 32301 (850) 425-6654 Main (850) 425-6663 Direct (850) 425-6694 Fax Email: pkeillor@radeylaw.com

DOCUMENT NUMBER-DATE

# **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for approval of renewable energy tariff standard offer contract, by Florida Power & Light Company.

In re: Petition for approval of standard offer contract for purchase of firm capacity and energy from renewable energy producer or qualifying facility less than 100 kW tariff, by Progress Energy Florida, Inc.

In re: Petition for approval of standard offer contract for small qualifying facilities and producers of renewable energy, by Tampa Electric Company. DOCKET NO. 070234-EQ

DOCKET NO. 070235-EQ

DOCKET NO. 070236-EQ

Filed: December 10, 2007

### **IOUs' JOINT MOTION FOR ENLARGEMENT OF TIME**

Pursuant to Florida Rule of Civil Procedure 1.090(b) and rule 28-106.204, Florida Administrative Code, Florida Power & Light, Progress Energy Florida, Inc., and Tampa Electric Company (collectively the "IOUs") hereby request an enlargement of time to file their testimony and exhibits. In support, the IOUs state:

1. The IOUs request an enlargement of time of four (4) days, in order to extend the due date for the IOUs' testimony and exhibits from January 10, 2008, as specified in the Order Establishing Procedure and Consolidating Dockets, to January 14, 2008, to ensure that the IOUs have adequate time after the holidays to sufficiently prepare and timely file testimony and exhibits.

2. The undersigned has communicated with the counsels of PCS White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (Mr. James W. Brew) and the Florida Industrial Cogeneration Association (Mr. Richard A. Zambo). The undersigned has received their consent to an extension of four (4) days for the IOUs to file testimony and

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exhibits, with the understanding that the due dates for the Intervenors' testimony and exhibits, Staff's testimony and exhibits, if any, and Rebuttal testimony and exhibits would also be enlarged by four (4) days, for new due dates of February 18, 2008 for Intervenors' testimony and exhibits; March 3, 2008 for Staff's testimony and exhibits; and March 10, 2008 for Rebuttal testimony and exhibits.

3. The IOUs therefore request a Commission Order for an enlargement of four (4) days to extend all due dates for testimony and exhibits in these dockets, to ensure that all parties have adequate time to prepare and file testimony and exhibits.

Respectfully submitted,

s/ Susan F. Clark Susan F. Clark Radey Thomas Yon & Clark 301 S. Bronough Street, Suite 200 Tallahassee, Florida 32301 (850) 425-6654 telephone

# Attorney for Progress Energy Florida, Inc.

s/ Bryan S. Anderson Bryan S. Anderson Florida Power & Light 700 Universe Blvd. Juno Beach, FL 33408-0420 (561) 304-5253 telephone

#### Attorney for Florida Power & Light

s/ James D. Beasley James D. Beasley Ausley & McMullen, P.A. Post Office Box 391 Tallahassee, Florida 32302 (850) 222-7952 telephone

### Attorney for Tampa Electric Company

#### **CERTIFICATE OF SERVICE**

I CERTIFY that a true and correct copy of the foregoing has been furnished by

Electronic Mail this 10<sup>th</sup> day of December 2007, to the following:

Florida Industrial Cogeneration Association c/o Richard Zambo Richard A. Zambo, P.A. 2336 S. East Ocean Blvd., #309 Stuart, Florida 34996 richzambo@aol.com

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> <u>s/ Susan F. Clark</u> Susan F. Clark