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Sent:

Tuesday, August 30, 2011 4:27 PM

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Cc:

'Thomas A. Geoffroy'; 'Martin Cheryl'; Lisa Bennett; 'James D. Beasley'; 'J. Jeffry Wahlen'; 'Jeffrey

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Subject:

Docket NO. 110001-EI Attachments: 20110830161224174.pdf

Attached for electronic filing, please find Florida Public Utilities Company's Motion for Extension of Time. Please do not hesitate to contact me if you have any questions.

Beth Keating

bkeating@gunster.com Direct Line: (850) 521-1706

a. Person responsible for this electronic filing:

Beth Keating

Gunster, Yoakley & Stewart, P.A.

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- b. Docket No. 110001-EI In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.
- c. On behalf of: Florida Public Utilities Company
- d. There are a total of 5 pages.
- e. Description: FPUC's Motion for Extension of Time to File Testimony and Exhibits



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DOCUMENT NUMBER - CATE

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Writer's E-Mail Address: bkeating@gunster.com

August 30, 2011

BY ELECTRONIC FILING - FILINGS@PSC.STATE.FL.US

Ms. Ann Cole Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 110001-EI - Fuel and purchased power cost recovery clause with generating performance incentive factor.

Dear Ms. Cole:

Attached for electronic filing in the above-referenced Docket, please find Florida Public Utilities Company's Motion for Extension of Time.

Thank you for your assistance with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

Beth Keating

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MEK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery DOCKET NO. 110001-EI clause with generating performance incentive factor.

DATED: August 30, 2011

FLORIDA PUBLIC UTILITIES COMPANY'S MOTION FOR EXTENSION OF TIME TO FILE PROJECTION TESTIMONY AND EXHIBITS

Florida Public Utilities Company (FPUC or Company), by and through its undersigned counsel, hereby asks that the Prehearing Officer grant FPUC an extension of time, from September 1 until September 8, 2011, to file its Projection Testimony and Exhibits in the referenced Docket. In support thereof, FPUC states:

- 1. In accordance with Order No. PSC-11-0132-PCO-EI, issued February 25, 2011, ("Order Establishing Procedure" or "OEP"), the controlling date for Utilities to file their Projection Testimony and Exhibits is established as September 1, 2011.
- 2. FPUC has diligently endeavored to finalize its Projection filing in a timely manner; however, certain cost information that is necessary to complete the Company's projections is not yet available to the Company. The Company anticipates that the information will be available in time to complete the filing on or before September 8, 2011.
- 3. In addition to the referenced cost data, the Company is also awaiting a final recommendation from its consultant regarding allocations, which will also factor into the Projection filing. It is FPUC's understanding that the delay in receiving the recommendation has been unavoidable, and that the consultant likewise anticipates that he will be able to provide a recommendation in short order and in time to complete FPUC's filing on or before September 8, 2011.

4. Undersigned counsel has contacted the parties of record via email regarding this request for extension of time. As of the time of this filing, Progress Energy, Tampa Electric, FIPUG, Gulf Power, the Office of Public Counsel, the Federal Executive Agencies, and PCS Phosphate have each indicated that they have no objection to this request. FPL has also indicated it does not object, as long as the extension does not impact the dates associated with FPL's testimony. At this time, Counsel has received no indication regarding this request from the Florida Retail Federation, AFFIRM, or the City of Marianna.

WHEREFORE, FPUC respectfully requests that the Prehearing Officer allow FPUC an extension of time to file its Projection Testimony and Exhibit on or before September 8, 2011.

Respectfully submitted this 30th day of August, 2011.

Beth Keating

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(850) 521-1706

Attorneys for Florida Public Utilities Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 30th day of August, 2011:

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