

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 160001-EI

Date: September 1, 2016

FLORIDA POWER & LIGHT COMPANY'S MOTION FOR EXTENSION OF TIME

Florida Power & Light Company ("FPL"), hereby moves for an extension of time to file its Projection Petition and Testimony for 2017, Generation Performance Incentive Factor Targets January 2017-December 2017 Petition and Testimony, as well its answers to Staff's Fifth Set of Interrogatories (Nos. 42-49) and OPC's Fourth Set of Interrogatories (Nos. 74-82) and Second Request for Production of Documents (No. 3).

It was announced earlier this morning that the Public Service Commission will be closing at noon today. In light of the early closing, the storm that is heading towards Florida, and the fact that FPL's counsel have had substantial responsibilities in a rate case hearing over the past 2 weeks, FPL seeks a short extension of time regarding its Projection filing for 2017 (testimony and petition), its Generation Performance Incentive Factor Targets filing (testimony and petition) due today, as well as well its answers to Staff's Fifth Set of Interrogatories (Nos. 42-49) and OPC's Fourth Set of Interrogatories (Nos. 74-82) and Second Request for Production of Documents (No. 3). FPL will make these filings on the next day that the Commission is open for business.

FPL has contacted counsel for the parties in this case. No party has raised an objection the relief requested in this motion at this time. FPL will file an update to its certification of

conferral, if necessary.

Respectfully submitted this 1st day of September 2016.

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
john.butler@fpl.com
Maria J. Moncada
Senior Attorney
maria.moncada@fpl.com
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135

By: s/ Maria J. Moncada
Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 160001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Motion for Extension of Time has been furnished by electronic service this 1st day of September 2016 to the following:

Danijela Janjic, Esq.
Suzanne Brownless, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
djanjic@psc.state.fl.us
sbrownle@psc.state.fl.us

Andrew Maurey
Michael Barrett
Division of Accounting and Finance
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
amaurey@psc.state.fl.us
mbarrett@psc.state.fl.us

Beth Keating, Esq.
Gunster Law Firm
Attorneys for Florida Public Utilities Corp.
215 South Monroe St., Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com

Dianne M. Triplett, Esq.
Attorneys for Duke Energy Florida
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com

James D. Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Ashley M. Daniels, Esq.
Ausley & McMullen
Attorneys for Tampa Electric Company
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com
adaniels@ausley.com

Jeffrey A. Stone, Esq.
Russell A. Badders, Esq.
Steven R. Griffin, Esq.
Beggs & Lane
Attorneys for Gulf Power Company
P.O. Box 12950
Pensacola, Florida 32591-2950
jas@beggslane.com
rab@beggslane.com
srg@beggslane.com

Robert Scheffel Wright, Esq.
John T. LaVia, III, Esq.
Gardner, Bist, Wiener, et al
Attorneys for Florida Retail Federation
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

James W. Brew, Esq.
Laura A. Wynn, Esq.
Attorneys for PCS Phosphate - White Springs
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@smxblaw.com
laura.wynn@smxblaw.com

Robert L. McGee, Jr.
Gulf Power Company
One Energy Place
Pensacola, Florida 32520
rlmcgee@southernco.com

Mike Cassel, Director/Regulatory and
Governmental Affairs
Florida Public Utilities Company
911 South 8th Street
Fernandina Beach, Florida 32034
mcassel@fpuc.com

Matthew R. Bernier, Esq.
Duke Energy Florida
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matthew.bernier@duke-energy.com

Paula K. Brown, Manager
Tampa Electric Company
Regulatory Coordinator
Post Office Box 111
Tampa, Florida 33601-0111
regdept@tecoenergy.com

J. R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Jon C. Moyle, Esq.
Moyle Law Firm, P.A.
Attorneys for Florida Industrial Power
Users Group
118 N. Gadsden St.
Tallahassee, Florida 32301
jmoyle@moylelaw.com

By: s/ Maria J. Moncada
Maria J. Moncada
Florida Bar No. 0773301