BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost

Recovery Clause

In re: Energy Conservation Cost Recovery

Clause

In re: Environmental Cost Recovery Clause

Docket 20170001-EI

Docket 20170002-EI

Docket 20170007-EI

Date: September 13, 2017

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

Pursuant to Rule 28-106.204(4), Florida Administrative Code, Florida Power & Light Company ("FPL"), hereby moves the Florida Public Service Commission (the "Commission"), on an expedited basis, for an extension of time to make certain upcoming filings in the abovereferenced dockets. In support thereof, FPL states:

- As of Tuesday, September 12, 2017, Hurricane Irma had impacted 4.4 million of 1. FPL's 5.8 million customer accounts.
- 2. FPL mobilized a workforce of about 20,000 employees and contractors working 24 hours a day, seven days a week to restore service. This effort includes nearly 30 staging sites throughout the state.
- 3. The restoration effort extends beyond the crews out in the field. Many employees - including those who assist with testimony preparation - responding to discovery, and other regulatory filings also perform storm response and restoration roles.
- 4. While preparation of some of the below-listed filings may have begun prior to Hurricane Irma's landfall, the storm and the Company's response have interrupted the process for completing these filings. In light of the Company-wide focus on storm restoration, FPL asks

that it receive an extension for the below-listed deadlines. None of the requested extensions would result in the need for delays to scheduled prehearing conferences, prehearing statements, or hearings. Specifically, FPL requests the following extensions:

Docket No.	Filing	Current Deadline	Requested Filing Date
20170001	August A-Schedules	September 20, 2017	October 4, 2017
20170001	GPIF actual unit performance data schedules	September 20, 2017	October 4, 2017
20170001	Fuel and Purchased Power Cost Recovery Clause Rebuttal Testimony	September 21, 2017	September 29, 2017 ¹
20170001	FPL's response to Staff's 7th Set of Interrogatories (Nos. 70-72)	September 21, 2017	October 5, 2017
20170002	FPL's Answers to Staff's 2nd Set of Interrogatories	September 19, 2017	October 3, 2017
20170002	FPL's Answers to Staff's 3rd Set of Interrogatories	September 21, 2017	October 3, 2017
20170007	Environmental Cost Recovery Clause Rebuttal Testimony	September 18, 2017	September 25, 2017
20170007	August Monthly Solar Report	September 20, 2017	October 4, 2017

5. Pursuant to Rule 28-106.204(3), FPL has conferred with Staff and all parties to the above-referenced dockets, and is authorized to represent that the Commission Staff for the 20170001 and 20170007 dockets, Office of Public Counsel, Duke Energy Florida, Tampa Electric Company, Gulf Power Company, Florida Public Utilities Corp., PCS Phosphate – White Springs, and the Florida Industrial Power Users Group have no objection to the relief requested. FPL is not yet in a position to represent whether Southern Alliance for Clean Energy or Florida Retail Federation consent. In Docket 2017002, FPL has conferred with Staff and notified all parties but is not yet in a position to represent whether Staff consents to the requested extension.

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¹ The prefiling conferral reflected in paragraph 5 of this Motion was based on a due date for rebuttal testimony in Docket 20170001 of September 25, 2017. FPL changed its requested deadline to September 29, 2017 based on a separate request for four-day extension of the deadline for Staff and intervenor testimony.

WHEREFORE, for the foregoing reasons, FPL respectfully requests that the Commission grant FPL's Motion for Extension of Time.

Respectfully submitted this 13th day of September 2017.

Jessica A. Cano Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 Telephone: (561) 304-5226 Facsimile: (561) 691-7135

By: s/Jessica A. Cano
Jessica A. Cano
Fla. Bar No. 0037372

<u>CERTIFICATE OF SERVICE</u> DOCKET NOS. 20170001-EI, 20170002-EI, 20170007-EI

I HEREBY CERTIFY that a true and correct copy of FPL's Motion for Extension of Time was served electronically this 13th day of September 2017 to the following:

Suzanne Brownless, Esq.
Danijela Janjic, Esq.
Charles Murphy, Esq.
Stephanie Cuello, Esq.
Margo DuVal
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
djanjic@psc.state.fl.us
cmurphy@psc.state.fl.us
scuello@psc.state.fl.us
mduval@psc.state.fl.us

Matthew Bernier, Esq., Sr. Counsel 106 East College Ave., Suite 800 Tallahassee, Florida 32301-7740 Matthew.bernier@duke-energy.com Attorney for Duke Energy Florida, Inc.

Jon C. Moyle, Jr., Esq.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
Attorney for Fla. Industrial Power Users Group

James W. Brew, Esq.
Laura A. Wynn, Esq.
Stone, Mattheis, Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, N.W.
Eighth Floor, West Tower
Washington, D.C. 20007
jbrew@smxblaw.com
law@smxblaw.com
Attorneys for White Springs Agricultural
Chemicals, Inc. d/b/a PCS Phosphate — White
Springs

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

J.R. Kelly, Esq.
Charles Rehwinkel, Esq.
Patricia A. Christensen, Esq.
Office of Public Counsel
The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399
kelly.jr@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
christensen.patty@leg.state.fl.us
Attorney for Citizens of the State of Florida

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

George Cavros, Esq. 120 E. Oakland Park Blvd., Suite 105 Ft. Lauderdale, FL 33334 George@cavros-law.com Attorney for Southern Alliance for Clean Energy Beth Keating, Esq.
Gunster Law Firm
215 South Monroe St., Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com
Attorneys for Florida Public Utilities Corp.

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

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

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

By: s/ Jessica A. Cano
Jessica A. Cano
Fla. Bar No. 0037372