

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Peoples Gas System.

DOCKET NO. 20200051-GU

In re: Petition for approval of 2020 depreciation study by Peoples Gas System

DOCKET NO. 20200166-GU

FILED: July 28, 2020

**JOINT MOTION TO EXTEND THE DUE DATES FOR TESTIMONY, EXHIBITS, AND DISCOVERY ESTABLISHED BY ORDER NO. PSC 2020-0198-PCO-GU**

The Citizens of the State of Florida (“Citizens”), by and through the Office of Public Counsel (“OPC”), the Florida Industrial Users Group (“FIPUG”), and Peoples Gas System (“PGS”) (collectively, the “Parties”) pursuant to Rule 28-106.204, Florida Administrative Code (F.A.C.), hereby file their Joint Motion To Extend the Due Dates for Testimony and Exhibits Established by Order No. PSC-2020-0198-PCO-GU, issued June 22, 2020, in the above dockets. The Parties request that this Motion be granted and in support of the motion state:

1. On February 7, 2020, PGS filed its Test Year Notification Letter pursuant to Rule 25-7.140, F.A.C., thereby providing the Public Service Commission (“Commission”) with notice that the company intended to seek general rate relief pursuant to section 366.06(3), Florida Statutes.
2. On February 18, 2020, OPC filed its Notice of Intervention.
3. On April 6, 2020, due to the ongoing novel coronavirus pandemic, the Company requested, and was granted, a sixty-day extension in filing its MFRs.
4. On June 4, 2020, FIPUG filed its Notice of Intervention.
5. On June 8, 2020, PGS filed its MFRs and testimony.

6. On June 22, 2020, the Commission issued an Order Establishing Procedure, Order No. PSC 2020-0198-PCO-GU. The key activities date for the Docket were established as follows:

- |   |                     |
|---|---------------------|
| a) Utility's testimony and exhibits                             | June 8, 2020        |
| b) Intervenors' testimony and exhibits                          | August 3, 2020      |
| c) Staff's testimony and exhibits, if any                       | August 17, 2020     |
| d) Rebuttal testimony and exhibits                              | August 31, 2020     |
| e) Prehearing Statements  | September 23, 2020  |
| f) Prehearing Conference  | October 5, 2020     |
| g) Discovery deadline   | October 5, 2020     |
| h) Deadline for electronic filing of cross-examination exhibits | October 20, 2020    |
| i) Hearing  | October 27-29, 2020 |
| j) Briefs   | November 12, 2020   |

6. Pursuant to Rule 28-106.204(4), F.A.C., "Motions for extension of time shall be filed prior to the expiration of the deadline sought to be extended and shall state good cause for the request."

7. OPC requested additional time to prepare its testimony. OPC needs sufficient time to thoroughly analyze and assess all responses to its discovery in addition to the Company's testimony and exhibits to ensure customers' positions are well represented. PGS needs adequate time to conduct discovery and prepare responsive testimony.

8. The modification of the testimony and exhibit deadlines, coupled with adjustments in the activities dates related to the Prehearing Statement and Discovery Deadline will allow the Parties to best utilize its limited time and resources, including the OPC whose expert witnesses have multiple clients, in various jurisdictions, and who operate on tight time schedules to provide consulting and testimony services.

9. With collaborative effort, the Parties and Staff have reached tentative consensus that the following deadlines appear to be workable and further believe them to be in the best interest of everyone and constitute good cause shown herein:

- |  |                    |
|--|--------------------|
| a. Intervenors' testimony and exhibits | August 31, 2020    |
| b. Staff Testimony and exhibits.       | August 31, 2020    |
| c. Rebuttal testimony and exhibits     | September 21, 2020 |
| d. Prehearing Statements               | September 28, 2020 |
| e. Discovery Deadline                  | October 9, 2020    |

WHEREFORE, the Parties hereby request that the Prehearing Officer grant their Motion to Modify the Due Dates for Testimony and Exhibits, and related activities dates Established by Order No. PSC 2020-0198-PCO-GU, dates for the consolidated dockets as outlined in the body of this motion, above.

Respectfully submitted,

s/A. Mireille Fall-Fry

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the forgoing has been furnished by electronic mail on this 28<sup>th</sup> day of July 2020, to the following:

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