

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: September 2, 2020

MOTION TO ACCEPT LATE-FILED TESTIMONY AND EXHIBITS

The Citizens of the State of Florida (“Citizens”), by and through the Office of Public Counsel (“OPC”), pursuant to Rule 28-106.204, Florida Administrative Code (F.A.C.), hereby file this Motion To Accept Late-Filed Testimony and Exhibits in the above dockets. OPC requests 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 22, 2020, the Commission issued an Order Establishing Procedure, Order No. PSC 2020-0198-PCO-GU. The key activity dates 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. On July 30, 2020, the Commission issued an Order revising several of the above-listed dates, Order No. PSC 2020-0272-PCO-GU. The following activity dates for the Docket were revised as shown below:

- a) Intervenors' testimony and exhibits August 31, 2020
- b) Staff's testimony and exhibits, if any August 31, 2020
- c) Rebuttal testimony and exhibits September 21, 2020
- d) Prehearing Statements September 28, 2020
- e) Prehearing Conference October 12, 2020
- f) Discovery deadline October 9, 2020
- g) Deadline for electronic filing of cross-examination exhibits October 20, 2020

7. OPC was prepared to file the testimony and exhibits of Andrea Crane on August 31, 2020, but needed additional time to permit PGS to review and redact confidential information and to file the appropriate Notice of Intent with the Commission. OPC provided the non-redacted testimony to the Company and to the other intervenor party on August 31, 2020. Accordingly, neither the Company nor the other intervenor party was impaired by this delay.

8. OPC understands that PGS will file the appropriate Notice of Intent today, September 1, 2020.

9. OPC has conferred with the other parties and there are no objections.

WHEREFORE, OPC hereby requests that the Prehearing Officer grant their Motion to Accept Late-Filed Testimony and Exhibits.

Respectfully submitted,

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CERTIFICATE OF SERVICE
Docket No. 20200051-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 2nd day of September 2020, to the following:

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