## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for Determination of Need for Intrastate Natural Gas Pipeline by SunShine Pipeline Partners

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Docket No.: 920807-GP

## MOTION FOR EXTENSION OF TIME IN WHICH TO SERVE PRE-FILED TESTIMONY BY FLORIDA GAS TRANSMISSION COMPANY

Florida Gas Transmission Company ("FGT"), by the undersigned attorneys and pursuant to Florida Administrative Code rule 25-22.037(2), hereby files this motion for extension of time until Monday, April 12, 1993, in which to serve its pre-filed testimony in the above-referenced matter and in support thereof states:

- FGT's direct testimony is to be filed with the Public Service Commission ("PSC") on or before April 2, 1993.
- 2. The direct testimony of SunShine Pipeline Partners ("SunShine") was to have been filed with the PSC on or before March 5, 1993. However, FGT did not receive SunShine's direct testimony / until March 10, 1993, and did not receive the revised direct testimony until several days later.
  - 3. Moreover, FGT's primary witness, Dr. Paul A. Carpenter of Incentives Research, Inc., of Boston, Massachusetts, will be involved in a week long hearing in California from March 28, 1993 through April 2, 1993. Because of the late receipt of SunShine's direct testimony, the factual issues raised by that direct testimony, and the long-scheduled California hearing in which Dr. Carpenter is involved, FGT will not be able to adequately prepare its responsive direct testimony on or before April 2, 1993.

- 4. FGT therefore requests an extension of time in which to file its direct testimony until April 12, 1993. This request for an extension of time is reasonable and just under the circumstances, particularly since SunShine had many months (since summer of 1992) in which to prepare its direct testimony and the PSC repeatedly pushed back, at SunShine's request, the formal commencement of these proceedings.
- 5. The undersigned counsel has consulted with counsel for SunShine, and Intervenor Florida Power Corporation, who have no objection to this request provided the date for filing rebuttal testimony is likewise extended from April 9, 1993 to April 22, 1993.

PEEPLES, EARL & BLANK, P.A.

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of the foregoing have been served by U. S. Mail on Steve Tribble, Director, Division of Records and Reporting, Florida Public Service Commission, Fletcher Building, 111 East Gaines Street, Tallahassee, Florida 32399-0850 and that copies have been furnished by U. S. Mail to the following persons:

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