

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Adoption of Numeric Conservation Goals
for Tampa Electric Company

Docket No. 971007-E.G.
Filed: June 24, 1999

MOTION TO TOLL TIME FOR FILING TESTIMONY

Legal Environmental Assistance Foundation, Inc., ("LEAF") files this Motion to Toll Time for Filing Testimony and states:

1. LEAF's testimony in the above-styled docket is now scheduled to be filed on July 8, 1999.
2. LEAF and Tampa Electric Company ("TECO") are currently engaged in settlement negotiations.
3. Tolling time for filing testimony is essential if LEAF is to continue to discuss settlement with TECO. It is not possible for LEAF to simultaneously consider and discuss TECO's settlement proposal and undertake the activities necessary to prepare and timely file its testimony in the above-styled case.
4. Tolling time for filing testimony will avoid unnecessary expenses. LEAF's testimony is being prepared with the assistance of paid consultants. Preparing and filing testimony will require LEAF to incur significant expenses for consultant services. Were LEAF and TECO to reach a stipulated settlement acceptable to the Commission, these significant expenditures would have been for naught.
5. Granting this motion would be consistent with the Commission's policy of encouraging parties to settle disputes whenever possible.
6. LEAF has conferred with counsel for TECO and for Florida Industrial Power Users Group ("FIPUG"), the only other parties to this proceeding, and states that TECO agrees with the granting of this motion and FIPUG does not object to the granting of this motion.

WHEREFORE, LEAF moves that the Commission toll the time for filing testimony in this docket for a reasonable period to allow LEAF and TECO to discuss settlement in this case.

Respectfully submitted,

Debra Swin

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of LEAF's Motion to Toll Time for Filing Testimony were sent by overnight mail or hand delivery(*) this 24th day of June, 1999 to:

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