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June 23, 1999

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0950

RE: Docket No.: 971004-EG, Adoption of conservation goals for Florida Power and Light

Dear Ms. Bayo:

Enclosed, for filing in the docket referenced above, are the original and ten copies of LEAF's Motion to Toll Time for Filing Testimony.

Please document this filing by stamping the attached copy of this letter. Thank you for your assistance in this matter. If you have questions, please let me know.

Sincerely,

Debra Swim

Debra Swim
Senior Attorney
Energy Advocacy Project

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Enclosures

- AFA _____
- APP _____
- CAF _____
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- MAS 5
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- OTH _____

DOCUMENT NUMBER-DATE

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Adoption of Numeric Conservation Goals
for Florida Power & Light Company

Docket No. 971004-E.G.
Filed: June 23, 1999

MOTION TO TOLL TIME FOR FILING TESTIMONY

Intervenor, 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. Today, LEAF and Florida Power and Light Company ("FPL") entered, and jointly moved for Commission approval of, a stipulated settlement of the above-referenced docket.
3. Were the Commission to approve the stipulation, LEAF would, pursuant to stipulation's terms, withdraw from the above-referenced docket.
4. LEAF's testimony is being prepared with the assistance of paid consultants. To meet the current filing dates LEAF must prepare testimony between now and July 8, 1999. Such preparation will require LEAF to incur significant bills for consultant services between now and July 8.
5. Were the Commission to approve the LEAF-FPL stipulation, as FPL and LEAF have requested, these significant expenditures would have been for naught since LEAF would no longer be a party to this case.
6. The Commission's staff has recommended approval of similar stipulations which LEAF has entered with Florida Power Corporation in Docket No. 971004-EG and with Gulf Power Corporation in Docket No. 971005-EG.
7. Granting this motion would be consistent with the Commission's policy of encouraging parties to settle disputes whenever possible.
8. LEAF has conferred with counsel for FPL and for Florida Industrial Power Users Group ("FIPUG") and states that FPL and FIPUG agree with the granting of this motion.

WHEREFORE, LEAF moves that the Commission toll the time for filing testimony in this docket

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until a reasonable time after the Commission votes on the Joint Motion to Approve the LEAF-FPL stipulation which was filed today.

Respectfully submitted,



DEBRA SWIM
Legal Environmental Assistance Foundation, Inc.
1114 Thomasville Road, Suite E
Tallahassee, FL 32303-6290
(850) 681-2591

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 23th day of June, 1999 to:

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