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July 15, 1999

Ms. Blanca Bayo Director, Division of Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

RE: Docket No. 981591-EG

Dear Ms. Bayo:

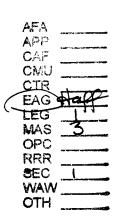
Enclosed is the original and 15 copies of "Gulf Power Company's Second Motion for Extension of Time for Filing Direct Testimony".

Sincerely,

Robert G. Livingston

RGL/fg

Attachment



FRSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for authority to implement Good Cents Conversion Program by Gulf Power Company

Docket :	No. 981591 <b>-EG</b>	
Date Fil	led:	

## GULF POWER COMPANY'S SECOND MOTION FOR EXTENSION OF TIME FOR FILING DIRECT TESTIMONY

Gulf Power Company ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned counsel, hereby requests an additional extension of time in which to serve its direct testimony. In support of this motion, the Company states:

- 1. Pursuant to Florida Public Service Commission Order No. PSC-99-1217-PCO-EG, Gulf was originally scheduled to file direct testimony on July 13, 1999. By motion dated July 9, 1999, Gulf requested an additional seven (7) days to file direct testimony. By Gulf's original motion, the new deadline for Gulf to file direct testimony is July 20, 1999, and the deadlines for filing intervenors' direct testimony and Staff's direct testimony were to be August 3 and 17 respectively. Under Gulf's original motion, Gulf is still be required to file rebuttal testimony, if any, on August 24, 1999.
- 2. In the course of preparing its direct testimony, Gulf has recently conducted some additional research relevant to this case. The Company needs additional time for key personnel to consider the results of this research and other related matters before completing and filing its direct testimony. Due to the schedules of such key personnel, the opportunity for such consideration has been and will be limited during the extension contemplated by Gulf's original motion. As a result, Gulf now requests an additional two days be added to the deadline for filing all direct and rebuttal testimony. Gulf further requests that the deadline for filing the prehearing statements be extended by two days. Pursuant to this motion, the new deadlines would be:

FRSC-RECORDS/REPORTING

Description	Old deadline (as initially revised)	New proposed deadline
1) Utility's direct testimony and exhibits	July 20, 1999	July 22, 1999
2) Intervenors' direct testimony and exhibits	August 3, 1999	August 5, 1999
3) Staff's direct testimony and exhibits, if any	August 17, 1999	August 19, 1999
4) Rebuttal testimony and exhibits, if any	August 24, 1999	August 26, 1999
5) Prehearing Statements	August 30, 1999	September 1, 1999

3. Counsel for the Commission's Staff has been consulted prior to filing this motion and has authorized Gulf Power to advise the Commission that it agrees to the requested extension.

WHEREFORE, Gulf Power Company respectfully requests that the date for filing testimony and prehearing statements by Gulf, intervenors and Staff be extended as provided herein.

Respectfully submitted this \( \sqrt{5}^h\) day of July 1999.

**JEFFREY A. STONE** 

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**Attorneys for Gulf Power Company** 

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for authority to implement Good Cents Conversion Program by Gulf

Docket No. 981591-EG

Power Company

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 15th day of

July by U.S. Mail or hand delivery to the following:

Tiffany R. Collins, Esquire Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0863

Robert Elias, Esquire Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0863

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