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August 10, 1999

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

HAND DELIVERY

RECEIVED-FPSC  
AUG 10 PM 3:34  
RECORDS AND REPORTING

Re: Docket No. 981890-EU

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of City of Tallahassee are the original and fifteen copies of City of Tallahassee's Motion for Extension of Time to File Prefiled Direct Testimony.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

*[Handwritten signature]*  
Kenneth A. Hoffman

KAH/rl  
Enclosures

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation	)	
into the aggregate electric	)	Docket No. 981890-EU
utility reserve margins planned	)	
for Peninsular Florida	)	Filed: August 10, 1999
_____)		

**CITY OF TALLAHASSEE'S MOTION FOR  
EXTENSION OF TIME TO FILE  
PREFILED DIRECT TESTIMONY**

The City of Tallahassee ("City"), by and through its undersigned counsel, hereby moves for a ten day extension of time for the filing of its Prefiled Direct Testimony in the above-referenced docket. In support of this Motion, the City states as follows:

1. Pursuant to Order No. PSC-99-1274-PCO-EU issued July 1, 1999, the Order Clarifying Scope of Proceeding; Docket Procedures; and Establishing Issues ("Order"), the Prehearing Officer established the issues to be addressed in the final hearing in this docket. Pursuant to the Order, the issues may be modified upon a showing of good cause.

2. Florida Power & Light Company and Florida Power Corporation timely filed motions for reconsideration of the Order which were denied at the July 27, 1999 Agenda Conference.

3. The City's prefiled direct testimony in this docket is due August 16, 1999. The City intends to address, at minimum, Issue Nos. 10 and 12 in the list of issues attached to the Order. The City's testimony will be prepared and presented by David Byrne, P.E., the Chief Planning Engineer for the City of Tallahassee Electric Operations. Mr. Byrne embarked on a vacation soon after completing the City's responses to the Staff's discovery requests which were served on June 28, 1999. Mr. Byrne is expected to return from his vacation on August 16, 1999, the date on which the City's prefiled direct testimony is due.

4. Based on the above facts and circumstances, the City requests an extension of time

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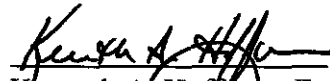
09504 AUG 10 99

FPCO-RECORDS/REPORTING

of ten days until August 26, 1999 to allow Mr. Byrne a reasonable period of time to prepare and file direct testimony in this docket. The undersigned counsel for the City has discussed this request for an extension with counsel for the Commission staff and is authorized to represent that the Commission staff has no objection to the City's request.

WHEREFORE, the City of Tallahassee respectfully request an extension of time of ten days up to and until August 26, 1999, for the filing of prefiled direct testimony in this docket.

Respectfully submitted,

  
Kenneth A. Hoffman, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail this 10<sup>th</sup> day of August, 1999, to the following:

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Florida Municipal Power Agency  
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Tallahassee, FL 32315

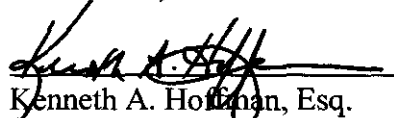
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