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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment)
of Certificate No. 427-W to add)
territory in Marion County by) Docket No. 960867-WU
Windstream Utilities Company.)
_____)

MOTION FOR EXTENSION OF TIME
TO FILE REBUTTAL TESTIMONY

Comes now WINDSTREAM UTILITIES COMPANY (hereinafter "Windstream" or "Utility"), by and through its undersigned attorneys, and moves for an extension of time for filing its Rebuttal testimony established pursuant to the Commission's Prehearing Procedure Order No. PSC-96-1273-PCO-WU issued on October 10, 1996, and in support thereof states as follows:

1. Commission Order No. PSC-96-1273-PCO-WU was issued on October 10, 1996 establishing the controlling dates for various key events in Windstream's extension application proceeding, including the March 10, 1996 due date for the Utility's Rebuttal testimony.

2. The Commission's Prehearing Order Establishing Procedure was issued among other things to set key dates for the processing of the Utility's application after protest to that application was received from J.B. Ranch, a potential customer within that service area. As a result of the several factors, including the withdrawal of the protest by J.B. Ranch and the Utility's amendment to its application to exclude the J.B. Ranch property, the Commission was set to consider a Staff recommendation for dismissal of J.B. Ranch as a protestant and for denying Marion County its requested intervention status on the Commission's March 4 agenda conference.

ACK _____
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EAG _____
LEG 1
LIN 3
OPC _____
RCH _____
SEC 1
WAS Beckmann
OTH _____

DOCUMENT NUMBER-DATE

02302 MAR-4-96

FPSC-RECORDS/REPORTING

3. The undersigned counsel was informed on the afternoon of March 3rd of the Commission's intent to defer action on the dismissal of J.B. Ranch's protest and the status of Marion County until the March 18 Agenda Conference.

4. Under the terms of the Order No. PSC-96-1273-PCO-WU, Windstream's extensive rebuttal testimony and response to that attempted to be filed by Marion County as Intervenor is due on March 10, 1997. If the Commission adopts the proposal by the Utility to dismiss the J.B. Ranch protest or its Staff's recommendation, the filing of this costly rebuttal testimony by Windstream will not be required.

5. The schedule, as set out in Order No. PSC-96-1273-PCO-WU is such that after the March 10, 1997 due date for Windstream's rebuttal testimony, the next major event is the filing of prehearing statements on April 21 and prehearing conference on May 28, 1997. As such, there is substantial "free" time available to allow for adjustment to the Utility's rebuttal testimony due date.

6. In order to avoid the extreme cost and inconvenience that will result from the Utility's having to file testimony in the case in which the protests may be dismissed, Windstream requests that the Commission grant the Utility up through and until March 31, 1997 as the due date for its rebuttal testimony. In this way, the Utility will know whether the filing of that testimony is even necessary. Should the Commission decide to allow this matter to continue to hearing despite the arguments of the Staff and the Utility that such is inappropriate, no party will be prejudiced by this short delay. No other significant events are set to occur

within three weeks of the revised due date for rebuttal testimony as requested herein.

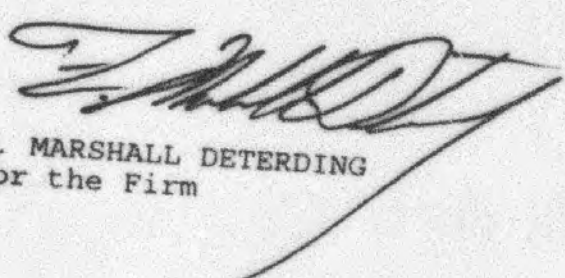
Undersigned counsel has faxed a copy of this Motion to the office of Tom Cloud, attorney for Marion County and to Joseph Lettelleir, the representative of J.B. Ranch at 9:00 A.M., March 4, 1997, but has not had an opportunity to confer with those representatives on this matter.

WHEREFORE, Windstream Utilities, Inc. requests that the Florida Public Service Commission extend the due date for the filing of its rebuttal testimony for March 10, 1997 until March 31, 1997. No parties will be prejudiced by such a delay and the Utility may be able to avoid expenditure of substantial amounts of money and time in preparing unneeded testimony if the Commission ultimately decides as its March 18 agenda conference to dismiss the objections and avoid a hearing in this matter altogether.

Respectfully submitted on this
4th day of March, 1997, by:

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(904) 877-6555

BY:


F. MARSHALL DETERDING
For the Firm

CERTIFICATE OF SERVICE

Docket No. 960867-WU

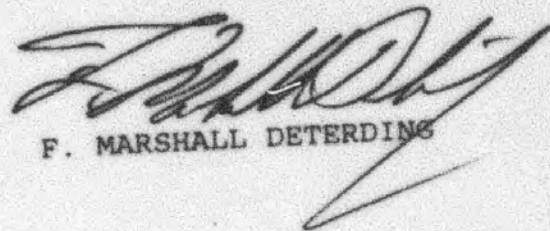
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail (**and via telecopy) to the following parties this 4th of March, 1997.

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