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March 2, 2001

By Hand Delivery

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, FL 32399-0850

Re: Docket No.000061-EI

RECEIVED-FPSC
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RECORDS AND
REPORTING

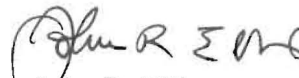
Dear Ms. Bayo:

Enclosed for filing on behalf of Allied/CFI are the original and fifteen copies of Allied/CFI's Second Motion For Extensions of Time For Filing of Responses to Motion to Strike And Motion For Summary Final Order.


Please acknowledge this filing by date stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,


John R. Ellis

APP JRE/sy
CAF Enclosures
CMP
COM 3
CTR cc: Parties of Record
ECR
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
02843 MAR-20
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal)
Corporation and Chemical Formulators,)
Inc. against Tampa Electric Company)
for violation of Sections 366.03,)
366.06(2) and 366.07, Florida Statutes,)
with respect to rates offered under)
Commercial/Industrial Service Rider tariff;)
petition to examine and inspect confidential)
information; and request for expedited)
relief.)
_____)

Docket No. 000061-EI

Filed: March 2, 2001

**ALLIED/CFI'S SECOND MOTION FOR EXTENSIONS OF TIME
FOR FILING OF RESPONSES TO MOTION TO STRIKE
AND MOTION FOR SUMMARY FINAL ORDER**

Allied Universal Corporation ("Allied") and Chemical Formulators, Inc. ("CFI"),

hereinafter referred to collectively as "Allied/CFI," by and through their undersigned counsel, and pursuant to Rule 28-106.204, Florida Administrative Code, hereby move for a second extension of time in which to file their responses to the motion to strike and motion for summary final order filed by Intervenor, Odyssey Manufacturing Company ("Odyssey") and Sentry Industry, Inc. ("Sentry") (hereinafter referred to collectively as "Intervenors"), and state:

1. At the final hearing on February 19, 2001, a settlement in principle was agreed to between Allied/CFI and TECO and was announced on the record by counsel for Allied/CFI and TECO. The settlement provides for the relief requested by Intervenor in their Petitions for Leave to Intervene.

2. Counsel for Allied/CFI and TECO have been engaged in drafting a formal written settlement agreement since February 19, 2001. It is expected that the written settlement agreement will be completed and filed today, in order to provide time for a recommendation by the

DOCUMENT NUMBER-DATE

02843 MAR-25

FPSC-RECORDS/REPORTING

Commission's staff counsel concerning acceptance or rejection of the Settlement Agreement for the March 13, 2001 Agenda Conference.

3. On February 16, 2001, Intervenors filed a Motion to Strike. Pursuant to an oral order issued at the final hearing on February 19, 2001, Allied/CFI's response to the motion to strike was due for filing on February 28, 2001.

4. On February 23, 2001, Intervenors filed a Motion for Summary Final Order. Pursuant to Order No. PSC-00-2537-PCO-EI, issued December 29, 2000, Allied/CFI's response to the motion for summary final order was due for filing on February 28, 2001.

5. By a motion filed on February 28, 2001, Allied/CFI requested an extension of time of two days, to and including March 2, 2001, in which to file its responses to Intervenors' motion to strike and motion for summary final order.

7. If the Settlement Agreement is finalized as expected, then Intervenors' motions are mooted as was discussed at the February 19, 2001 final hearing with respect to the motion to strike. If the Settlement Agreement is not finalized, there is no urgency requiring an immediate response and ruling on either motion, pending rescheduling of the final hearing. Under these circumstances, the requested brief extensions of time for Allied/CFI's responses to the motions will not cause any prejudice to any party. However, requiring Allied/CFI to file responses which detract from its settlement efforts, which may be unnecessary, and which provide only an unnecessarily abbreviated and truncated period for those responses, would cause substantial prejudice to Allied/CFI.

8. Additionally, Allied/CFI notes that Rule 28-106.204, Fla. Admin. Code, by its terms does not contemplate or provide for the filing of a motion for summary final order after a final hearing has begun. For this reason Intervenors' motion for summary final order is subject to being

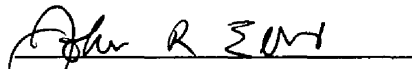
summarily rejected or stricken.

9. Allied/CFI maintains that no party will be prejudiced by the granting of the requested extensions, and that granting of the extensions is reasonable in that Allied/CFI has appropriately continued to focus its efforts since February 28, 2001 on the drafting of the Settlement Agreement.

7. Counsel for Allied/CFI has conferred with counsel for Intervenors concerning the subject of this motion, and represents that Intervenors oppose the motion for an extension as to the motion for summary final orders, and do not oppose the motion for an extension as to the motion to strike.

WHEREFORE, Allied CFI respectfully requests that the Prehearing Officer enter an Order granting this motion and extending the time for filing of Allied/CFI's responses to Intervenors' motion to strike and motion for summary final order to Friday, March 9, 2001.

Respectfully submitted,



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Attorneys for Allied Universal Corporation
and Chemical Formulators, Inc.

AMENDED CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Allied/CFI's Second Motion for Extensions of Time for Filing Responses to Motion to Strike, and Motion for Summary Final Order was furnished by U. S. Mail, or by hand delivery (*), or telecopier (**), to the following this 2nd day of March 2001:

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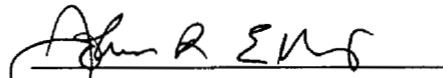
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