



Florida Power

A Progress Energy Company

ASSOCIATE GENERAL COUNSEL

ORIGINAL
JAMES A. MCGEE

September 14, 2001

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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COMMISSION
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Re: Docket No. 010001-EI

Dear Ms. Bayó:

Enclosed for filing in the subject docket are an original and ten copies of the Motion of Florida Power Corporation for Extension of Time to File Supplemental Testimony.

Please acknowledge your receipt of the above filing on the enclosed copy of this letter and return to the undersigned. Also enclosed is a 3.5 inch diskette containing the above-referenced document in WordPerfect format. Thank you for your assistance in this matter.

Very truly yours,

James A. McGee

JAM/scc
Enclosure

cc: Parties of record

- A-P
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost
Recovery Clause and Generating
Performance Incentive Factor.

Docket No. 010001-EI

Submitted for filing:
September 14, 2001

**MOTION OF FLORIDA POWER CORPORATION
FOR EXTENSION OF TIME TO FILE SUPPLEMENTAL TESTIMONY**

Florida Power Corporation (Florida Power or the Company) hereby moves the Prehearing Officer for an extension of time until October 19, 2001 to file supplemental testimony regarding certain additional issues that have been designated for consideration at the November 2001 hearing in Order No. PSC-01-1829-PCO-EI, issued by the Prehearing Officer on September 11, 2001. In support of this motion, Florida Power states as follows:

1. Order No. PSC-01-1829-PCO-EI, entitled "Second Order Revising Order Establishing Procedure" (the Revised Procedural Order), added nine generic issues to the eight issues identified in the initial procedural order and three Florida Power-specific issues to the three initially identified issues, or a total of 12 additional issues that Florida Power must address in prefiled testimony currently due on September 20, 2001. Florida Power seeks an additional 30 days to file supplemental testimony addressing five additional issues regarding hedging practices (Issues 11 - 14 and 19D) and one additional issue regarding an outage at its Crystal River Unit 2 coal plant (Issue 19E).

2. As the Revised Procedural Order notes, the issues added by the Order were included in a August 6, 2001 memorandum from Staff advising the parties of its intent to raise the listed issues for consideration at the November fuel adjustment hearing. In response to this memorandum, the undersigned counsel for Florida Power notified Staff counsel of the Company's request that certain of Staff's proposed new issues be deferred for later consideration and explained the reasons for Florida Power's concern that a requirement to address these issues by the September 20th testimony deadline would seriously compromise its ability to adequately present its case. Florida Power did not become aware of the disposition of its deferral request until it received the Revised Procedural Order.

3. The Revised Procedural Order appears to have alluded to the basis for Florida Power's deferral request by recognizing that the additional issues "may require the devotion of additional resources from the parties," but nonetheless concluded "that the additional issues should be addressed in this proceeding." Florida Power accepts the Prehearing Officer's decision to address these issues at the November hearing, but represents that it does not have the additional resources necessary to meet the September 20th deadline for filing testimony on the six additional issues identified in paragraph 1 above. The requested 30-day extension would still allow the additional issues to be considered at the November hearing, consistent with the Prehearing Officer's decision, while at the same time providing Florida Power the opportunity to adequately address these issues.

4. Florida Power suggests that Staff and intervenors be given until November 7th to file responsive testimony to the Company's supplemental filing, which would allow their testimony to be considered in identifying the parties'

positions at the November 8th Prehearing Conference. Florida Power proposes that it be allowed until November 16th to file brief rebuttal testimony, in the event the Company finds this to be necessary. Florida Power agrees to serve its supplemental testimony and rebuttal testimony, if any, upon Staff and intervenors, and any expert witnesses they advise the Company of, on an expedited, same day or next day basis. Florida Power asks that Staff and intervenors be instructed to serve any responsive testimony they may file on the same basis.

5. The undersigned has contacted counsel for Staff and intervenors FIPUG and the Office of Public Counsel and has been advised by each that they have no position on the requested extension of time, with the qualification by FIPUG that its willingness not to object is predicated on Florida Power fulfilling its commitment above to provide expedited service.

Respectfully submitted,

FLORIDA POWER CORPORATION

By



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FLORIDA POWER CORPORATION

DOCKET NO. 010001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the Motion of Florida Power Corporation for Extension of Time to File Supplemental Testimony has been furnished to the following individuals by regular U.S. Mail the 17th day of September, 2001.

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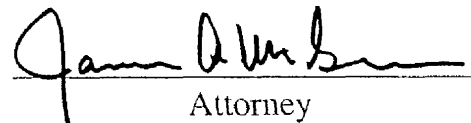
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