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February 24, 2004

Ms. Blanca S. Bayo, Director  
Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

Re: Docket No. 040086-EI

Dear Ms. Bayo:

Enclosed herewith for filing on behalf of Allied Universal Corporation and Chemical Formulators, Inc. ("Allied/CFI") are the original and fifteen copies of Allied/CFI's Motion for Stay and For Extension of Time to File Response in Opposition to Odyssey Manufacturing Company's Motion for Attorney's Fee and Sanctions.

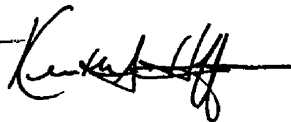
Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

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FEB 24 PM 1:00

RECEIVED & FILED

Sincerely,

FPSC-BUREAU OF RECORDS



Kenneth A. Hoffman

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KAH/rl

Enclosures

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DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Allied Universal Corporation and )  
Chemical Formulators, Inc.'s Petition to )  
Vacate Order No. PSC-01-1003-AS-EI )  
Approving, as Modified and Clarified, the )  
Settlement Agreement between Allied )  
Universal Corporation and Chemical )  
Formulators, Inc. and Tampa Electric )  
Company and Request for Additional )  
Relief. )  
\_\_\_\_\_ )

Docket No. 040086-EI  
Filed: February 24, 2004

**ALLIED UNIVERSAL CORPORATION  
AND CHEMICAL FORMULATORS, INC.'S MOTION  
FOR STAY AND FOR EXTENSION OF TIME TO FILE  
RESPONSE TO ODYSSEY MANUFACTURING COMPANY'S  
MOTION FOR ATTORNEY'S FEE AND SANCTIONS**

Allied Universal Corporation and Chemical Formulators, Inc. ("Allied/CFI"), by and through its undersigned counsel, and pursuant to Rule 28-106.204, hereby requests a stay of the March 1, 2004 deadline for the filing of its Response to the Motion for Attorney's Fee and Sanctions ("Motion") filed by Odyssey Manufacturing Company ("Odyssey") pending a ruling by the Prehearing Officer on the instant request for an extension of time up to and until March 12, 2004 for the filing of Allied/CFI's Response to Odyssey's Motion. In support of these Requests, Allied/CFI states as follows:

1. On February 23, 2004, Odyssey filed its Motion, accompanied by a Request for Oral Argument, in the instant docket. Odyssey's Motion and Request for Oral Argument were provided by facsimile and U.S. Mail to counsel for Allied/CFI. Under the applicable rules, Allied/CFI's Response to Odyssey's Motion is due to be filed on or before March 1, 2004.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

2. On February 20, 2004, Allied/CFI filed a Motion for Extension of Time up to and until March 12, 2004, for the filing of its Response to the Motions to Dismiss filed by Odyssey and Tampa Electric Company ("TECO").

3. Odyssey's Motion is directly tied to and, while not stating as such, presumably predicated on its arguments in its Motion to Dismiss.

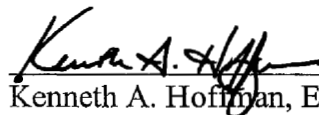
4. Accordingly, it is most efficient for Allied/CFI to address Odyssey's Motion together with Allied/CFI's Response to Odyssey's Motion to Dismiss.

5. Odyssey will not be prejudiced or harmed in any way by the granting of the relief sought herein.

6. Counsel for Allied/CFI has conferred with counsel for Odyssey and TECO and is authorized to represent that Odyssey objects to Allied/CFI's requested extension of time and TECO takes no position on the request.

WHEREFORE, Allied/CFI requests that the March 1, 2004 date for the filing of Allied/CFI's Response to Odyssey's Motion for Attorney's Fee and Sanctions be stayed pending a ruling by the Prehearing Officer on the instant motion and that the Prehearing Officer grant Allied/CFI an extension of time up to and until March 12, 2004 to file Allied/CFI's Response to Odyssey's Motion for Attorney's Fee and Sanctions.

Respectfully submitted,



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Attorneys for Allied Universal Corporation  
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**CERTIFICATE OF SERVICE**

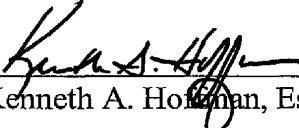
I HEREBY CERTIFY that a copy of the foregoing has been furnished by Hand Delivery and U.S. Mail(\*) this 24th day of February, 2004, to the following:

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