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Matilda Sanders

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Sent:

Thursday, January 11, 2007 10:26 AM

To:

Filings@psc.state.fl.us

Cc:

CHRISTENSEN.PATTY

Subject:

050958 - EI

Attachments: 050958 Motion for Extension of Time.doc

Electronic Filing

a. Person responsible for this electronic filing:

Patricia A. Christensen, Associate Public Counsel Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 (850) 488-9330 Christensen.patty@leg.state.fl.us

b. Docket No. 050958-EI

In re: Petition for approval of new environmental program for cost recovery through Environmental Cost Recovery Clause by Tampa Electric Company

- c. Document being filed on behalf of Office of Public Counsel
- d. There are a total of 3 pages.
- e. The document attached for electronic filing is the Motion for extension of time.

(See attached file: 050958 motion for extension of time.doc)

Thank you for your attention and cooperation to this request.

Asha Maharaj-Lucas Office of Public Counsel Telephone: (850) 488-9330 Fax: (850) 488-4491

CMP _____

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BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for approval of new environmental program for cost recovery through Environmental Cost Recovery Clause by Tampa Electric Company Docket No.: 050958-EI Filed: January 11, 2007

MOTION FOR EXTENSION OF TIME

The Citizens of the State of Florida (Citizens), by and through undersigned counsel, hereby requests that their Motion for Extension of Time be granted, and as grounds for states as follows:

- 1. By Order No. PSC-06-0968-PCO-EI, issued November 20, 2006, Intervenor testimony is due to be filed on January 17, 2007.
- 2. Citizens have engaged outside consultants to file testimony in this matter. Due to one of the consultant's being ill currently and unable to work on said testimony, Citizens seek an extension of the Intervenor testimony filing date for one week from January 17, 2007 to January 24, 2007.
- 3. Citizens contacted Tampa Electric Company's counsel. TECO's counsel represented that they had no objection to the one week extension provided that the rebuttal testimony filing date was extended for the same number of days.
- 4. Citizens also contacted Commission counsel who had no objection to the motion.

WHEREFORE, the Citizens hereby requests that the Commission grant their Motion for Extension of Time and reschedule the Intervenor testimony due date for one week from January 17, 2007 to January 24, 2007.

Respectfully Submitted,

s/ Patricia A. Christensen Patricia A. Christensen Associate Public Counsel

Office of the Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399-1400

Attorney for the Citizens of the State of Florida

CERTIFICATE OF SERVICE

I, HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Extension of Time has been furnished by electronic mail and U.S. Mail on this 11th day of January, 2007, to the following:

Lee L. Willis
James D. Beasley
Ausley Law Firm
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Tallahassee, FL 32302

Myron Rollins Black & Veatch Corporation 11401 Lamar Avenue Overland Park, KS 66211

Brenda Irizarry Tampa Electric Company P.O. Box 111 Tampa, FL 33601-0111

Martha Brown Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

> s/ Patricia A. Christensen Associate Public Counsel