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Cc: McGLOTHLIN.JOSEPH
Subject: Motion to Extend 060658-EI
Attachments: 060658 motion for extension of time.doc

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Electronic Filing

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Docket No. 060658-EI

In re: Petition on behalf of Citizens of the State of Florida to required Progress Energy Florida, Inc. to refund customers \$143 million

Document being filed on behalf of Office of Public Counsel

There are a total of 2 pages.

The document attached for electronic filing is Citizens' Motion for Extension of time.

(See attached file: 060658 Motion for extension of time.doc)

Thank you for your attention and cooperation to this request.

Asha Maharaj-Lucas
Secretary to Joseph A. McGlothlin, Associate Public Counsel.
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition on behalf of Citizens of)	
the State of Florida to require)	DOCKET NO. 060658-EI
Progress Energy Florida, Inc. to)	
refund customers \$143 million)	Filed: January 26, 2007
_____)	

CITIZENS' MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

The Citizens of the State of Florida, through the Office of Public Counsel, request an extension of two weeks, from February 20, 2007 until and including March 6, 2007, within which to submit rebuttal testimony in the above docket, and in support state:

1. This docket was initiated by a petition that Citizens filed on August 10, 2006.
2. Citizens filed direct testimony of expert witness Robert Sansom and OPC employee Patricia Merchant supporting their Petition on October 19, 2006.
3. By agreement of parties, and as memorialized in Order No. PSC-07-0048-PCO-EI, the dates for the filing of Progress Energy Florida Inc.'s (PEF) testimony and Citizens' rebuttal testimony were established to be January 16, 2007, and February 20, 2007, respectively.
4. Progress Energy Florida Inc. filed its testimony and exhibits on January 16, 2007. PEF filed testimony of thirteen witnesses, many of whom sponsor numerous exhibits. Because of the sheer number of witnesses whose testimony Citizens need to evaluate, as well as the need to conduct discovery related to the testimony, Citizens require an extension of time to prepare their rebuttal properly.

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5. An extension of two weeks, until and including March 6, 2007, will provide Citizens a more adequate opportunity to prepare rebuttal testimony. The existing schedule can accommodate the extension without prejudicing any party.
6. Citizens' counsel has discussed this request with counsel for Progress Energy Florida Inc., and is authorized to represent that PEF does not object to the granting of the two week extension.

Accordingly, Citizens request the Prehearing Officer to enter an order granting this Motion, and extending the deadline for the filing of rebuttal testimony until and including March 6, 2007.

Harold McLean
Public Counsel

s/ Joseph A. McGlothlin
Joseph A. McGlothlin
Associate Public Counsel

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