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Sent: Friday, March 16, 2007 1:04 PM
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Subject: Docket No. 060635-EU
Attachments: ResponseToReopeningOfRecord.pdf; ResponseToReopeningOfRecord.doc

ORIGINAL

The full name, address, telephone number, and e-mail address of the person responsible for the electronic filing:

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The docket number and title if filed in an existing docket:

Docket No. 060635-EU
 RESPONSE TO APPLICANTS' MOTION FOR LIMITED REOPENING OF RECORD AND FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY FILED BY JOHN CARL WHITTON, JR.

The name of the party on whose behalf the document is filed:

John Carl Whitton, Jr.

The total number of pages in each attached document: 3

A brief but complete description of each attached document:

Whitton's Response to Applicants' Motion for Limited Reopening of Record and For Leave to File Supplemental Testimony and Certificate of Service in PDF and Word format.

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DOCUMENT NUMBER-DATE
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 FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE STATE OF FLORIDA,
PUBLIC SERVICE COMMISSION

**In re: Petition for Determination of Need for
Electrical Power Plant in Taylor County by
Florida Municipal Power Agency, JEA,
Reedy Creek Improvement District, and
City of Tallahassee.**

**Docket No. 060635-EU
Dated: December 27, 2006**

**RESPONSE TO APPLICANTS' MOTION FOR LIMITED REOPENING
OF RECORD AND FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY
FILED BY JOHN CARL WHITTON, JR.**

John Carl Whitton, Jr. ("Whitton"), by and through the undersigned counsel, hereby files this Response to Applicants' Motion for Limited Reopening of Record and For Leave to File Supplemental Testimony and in support thereof states as follows:

1. On March 9, 2007, Applicants submitted a Motion for Limited Reopening of Record and For Leave to File Supplemental Testimony and Supplemental Testimony of Myron Rollins and waived applicable deadlines for Commission action under Rule 25-22.080, F.A.C.
2. Whitton does not oppose the Applicants' Motion and supports the Commission basing their ultimate decision on this Docket on the most accurate available information.
3. However, Whitton does request that in granting Applicants' Motion, the Commission provide adequate opportunity and time for limited discovery. With that in mind, the timeframe proposed by Intervenor Natural Resource Defense Counsel in their Response to Applicants' Motion seems reasonable to Whitton as well.

Wherefore, Whitton respectfully requests that the Motion for Limited Reopening of Record and For Leave to File Supplemental Testimony be granted and that a procedural order outline the timeframe for limited discovery be issued.

Dated this 16th day of March, 2007.

Respectfully submitted,

s/ Brett M. Paben

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been

furnished via e-mail to:

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