

Shawna Senko

From: Moncada, Maria <Maria.Moncada@fpl.com>
Sent: Monday, September 16, 2013 4:01 PM
To: Filings@psc.state.fl.us
Subject: Electronic Filing / Dkt 130007-EI / FPL's Motion For One-Day Enlargement Of Deadline To File Rebuttal Testimony
Attachments: FPL's Motion for One-Day Enlargement of Deadline to File Rebuttal Testimony.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Maria J. Moncada, Esq.
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
561-304-5795
Maria.Moncada@fpl.com

b. Docket No. 130007 – EI
In re: Environmental Cost Recovery Clause

c. The Document is being filed on behalf of Florida Power & Light Company.

d. There are a total of 4 pages

e. The document attached for electronic filing is Florida Power & Light's Motion For One-Day Enlargement Of Deadline To File Rebuttal Testimony.

Maria J. Moncada, Esq.
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
561-304-5795
Maria.Moncada@fpl.com

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost Recovery Clause

Docket No: 130007-EI

Date: September 16, 2013

**FLORIDA POWER & LIGHT COMPANY'S MOTION FOR ONE-DAY
ENLARGEMENT OF DEADLINE TO FILE REBUTTAL TESTIMONY**

Florida Power & Light Company, pursuant to Rule 25-106.204, Florida Administrative Code (2013), respectfully requests a one-day enlargement of the deadline to file its rebuttal testimony in Docket 130007-EI, through and including September 27, 2013. In support of this request, FPL states as follows:

1. On February 4, 2013, the Florida Public Service Commission ("Commission") entered its Order Establishing Procedure in this Docket. Order No. PSC-13-0070-PSC-EI.

2. The Order Establishing Procedure sets forth the following deadlines regarding filing prepared testimony:

- Utilities' Final True-Up Testimony and Exhibits April 1, 2013
- Utilities' Estimated/Actual Testimony and Exhibits August 1, 2013
- Utilities' Projection Testimony and Exhibits August 30, 2013
- Intervenors' and Staff's Testimony and Exhibits September 13, 2013
- Utilities' Rebuttal Testimony and Exhibits September 26, 2013

FPL timely filed and served its True-up, Estimated/Actual and Projection testimonies.

3. On September 13, 2013, DeSoto County Generating Company, LLC ("DeSoto") petitioned to intervene in this Docket. That petition remains pending. On that date, DeSoto also filed the prepared testimonies and exhibits of Kathy A. French and Carolyne Wass. Due to an administrative oversight, however, DeSoto did not serve this prefiled testimony until Saturday, September 14, one day later than the prescribed deadline.

4. The testimonies of Ms. French and Ms. Wass address significant issues related to FPL's requests in this docket and overlap with the issues addressed by at least one other intervenor witness. Because the Commission may ultimately grant DeSoto's petition to intervene, FPL must plan to address the issues raised by witnesses French and Wass.

5. FPL intends to file rebuttal testimony that addresses the issues raised by the various intervenors collectively. Because FPL received the prefiled testimonies of Ms. French and Ms. Wass one day after the Commission's deadline, FPL respectfully requests a one-day extension of the deadline to file rebuttal testimony that will address issues raised by all intervenors.

6. The one additional day will not prejudice any of the parties in this case. FPL has contacted DeSoto, the Office of Public Counsel and the Florida Industrial Power Users Group, and is authorized to represent that they have no objection to this motion.

7. This request is filed in good faith, for good cause, and not the purpose of delay.

WHEREFORE, FPL respectfully requests an extension of time up to and including September 27, 2013 to file its rebuttal testimony in this docket.

Respectfully submitted,

John T. Butler
Assistant General Counsel – Regulatory
Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135
Email: maria.moncada@fpl.com

By: *s/ Maria J. Moncada* _____
Maria J. Moncada
Fla. Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 130007-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Motion for One-Day Enlargement of Deadline to File Rebuttal Testimony has been furnished by electronic mail and United States Mail this 16th day of September, 2013 to the following:

Charles Murphy, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
cmurphy@psc.state.fl.us

James D. Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Ausley & McMullen
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausely.com
jwahlen@ausley.com
Attorneys for Tampa Electric

Jeffrey A. Stone, Esq.
Russell A. Badders, Esq.
Steven R. Griffin, Esq.
Beggs & Lane
501 Commendencia Street
Pensacola, Florida 32502
jas@beggslane.com
rab@beggslane.com
srg@beggslane.com
Attorneys for Gulf Power

Gary V. Perko, Esq.
Hopping Green & Sams
P.O. Box 6526
Tallahassee, FL 32314
garyp@hgslaw.com
Attorneys for Progress Energy Florida

J. R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 W Madison St. Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

John T. Burnett, Esq.
Dianne Triplett, Esq.
Progress Energy Service Company, LLC
P.O. Box 14042
St. Petersburg, Florida 33733-4042
john.burnett@pgnmail.com
dianne.triplett@pgnmail.com
Attorneys for Progress

Jon C. Moyle, Esq.
Moyle Law Firm, P.A.
118 N. Gadsden St.
Tallahassee, FL 32301
jmoyle@moylslaw.com
Co-Counsel for FIPUG

James W. Brew, Esq.
F. Alvin Taylor, Esq.
1025 Thomas Jefferson St., NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@bbrslaw.com
ataylor@bbrslaw.com
Attorney for White Springs

Robert Scheffel Wright, Esq.
John T. LaVia, III, Esq.
Garner, Bist, Wiener, et al
1300 Thomaswood Dr.
Tallahassee, FL 32308
schef@gbwlegal.com
jlavia@gbwlegal.com
Attorneys for DeSoto County Generating
Company, LLC

By: *s/ Maria J. Moncada* _____
Maria J. Moncada
Fla. Bar No. 0773301