

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for review and determination on)
the project construction and gas)
transportation agreement between NUI) DOCKET NO. 160175-GU
Utilities, Inc. d/b/a City Gas Company)
of Florida and Florida Crystals) FILED: August 5, 2016
Corporation, and approval of an)
interim service arrangement.)
_____)

**FLORIDA CRYSTALS CORPORATION'S UNOPPOSED
MOTION FOR ENLARGEMENT OF TIME TO FILE
RESPONSIVE PLEADINGS TO FLORIDA CITY GAS'
PETITION FOR REVIEW AND DETERMINATION
AND APPROVAL OF INTERIM SERVICE AGREEMENT**

Florida Crystals Corporation ("Florida Crystals"), by and through undersigned counsel, requests an enlargement of time up to and including August 29, 2016, to file its responsive pleadings to the Petition for Review and Determination and Approval of Interim Service Agreement (the "Petition") filed by Florida City Gas ("FCG"). The undersigned counsel has discussed this requested enlargement of time with counsel for FCG and is authorized to represent that FCG does not oppose the request. In support of its unopposed motion, Florida Crystals states:

1. On July 22, 2016, FCG initiated this docket by filing its Petition. Pursuant to Rule 28-106.204(2), Florida Administrative Code. Florida Crystals' responsive pleadings to the Petition will be due on August 11, 2016.

2. On August 5, 2016, concurrent with the filing of this motion, Florida Crystals move to be designated a party to this docket, or in the alternative, to intervene in this docket.

3. Within the response period currently provided, because of other pressing work demand, counsel for Florida Crystals will not have adequate time to respond to the Petition and thus is requesting an extension of time. Accordingly, Florida Crystals requests that the Commission grant an enlargement of time up to and including August 29, 2016 to file its responsive pleadings to the Petition.

WHEREFORE, Florida Crystals Corporation respectfully requests that the Commission enlarge the time within which it may file its responsive pleadings to FCG's Petition up to and including August 29, 2016.

Respectfully submitted this 5th day of August, 2016.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following, by electronic delivery, on this 5th day of August, 2016.

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