

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Review and)
Determination on the Project Construction)
and Gas Transportation Agreement By and) Docket No.: 160175-GU
Between NUI Utilities, Inc. d/b/a City Gas)
Company of Florida and Florida Crystals) Filed: September 7, 2016
Corporation dated April 24, 2001 and)
Approval of an Interim Service Arrangement)
_____)

**SECOND AGREED MOTION FOR
EXTENSIONS OF TIME TO RESPOND TO MOTIONS**

Florida City Gas (“FCG”) and Florida Crystals Corporation (“Florida Crystals”), pursuant to Rule 28-106.204, Florida Administrative Code, hereby file with the Florida Public Service Commission (“PSC” or “Commission”) this Second Agreed Motion for Approval of Extension of Time to Respond to Motions (the “Agreed Motion”). In support of this Motion, FCG and Florida Crystals state as follows:

1. On July 22, 2016, FCG filed its Petition for Review and Determination on the Project Construction and Gas Transportation Agreement By and Between NUI Utilities, Inc. d/b/a City Gas Company of Florida and Florida Crystals Corporation dated April 24, 2001 and Approval of an Interim Service Arrangement (the “Petition”).

2. On August 5, 2016, Florida Crystals filed its Unopposed Motion to be Designated a Party, or in the Alternative, Motion to Intervene. The Commission has yet to rule on this motion, but FCG has not opposed this request.

3. On August 29, 2016, Florida Crystals filed its Motion to Dismiss the Petition. Under the rules, any response by FCG to this motion would otherwise have been due on or before September 6, 2016. On August 31, 2016, FCG filed its Motion for Approval of a Temporary Interim Service Arrangement. Under the rules, any response by Florida Crystals to

this motion would otherwise have been due on or before September 7, 2016.

4. In view of potential weather related issues associated with Tropical Storm Hermine along with the other commitments of counsel for both parties, pursuant to Rule 28-106.204(3), Florida Administrative Code, counsel for FCG and Florida Crystals conferred and mutually agreed to extend their respective response dates to the respective motions identified in paragraphs 3 and 4 above to on or before 5 PM on September 12, 2016. This agreement was set forth in the Parties' Agreed Motion filed herein on September 1, 2016; no ruling has yet been issued.

5. In view of the prolonged power outages resulting from Hurricane Hermine's impacts on Tallahassee, which prevented the Parties' counsel from working on this and other matters during the restoration period, and in view of their respective attorneys' other professional and personal commitments, counsel for FCG and Florida Crystals have further conferred and mutually agreed to extend their respective response dates to the respective motions identified in paragraphs 2 and 3 above by an additional week, such that those responses will now be due on or before 5 PM on Monday, September 19, 2016.

6. Because counsel for FCG is presently outside the state, undersigned counsel Mr. Wright is authorized by Mr. Self to execute and submit this Agreed Motion on behalf of Florida City Gas.

WHEREFORE, Florida Crystals Corporation and Florida City Gas respectfully request that the Florida Public Service Commission grant this Second Agreed Motion and extend the response dates to the Florida Crystals Motion to Dismiss and the FCG Motion for Approval of a Temporary Interim Service Arrangement to 5 PM on September 19, 2016.

Respectfully submitted this 7th day of September 2016,

s/ Robert Scheffel Wright
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by E-

Mail on this 7th day of September 2016 to the following:

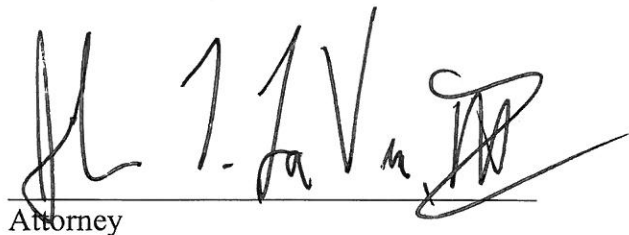
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