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September 9, 1999

HAND DELIVERED

RECORDS AND REPORTING
SEP - 9 PM 1:36
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ORIGINAL

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Generic Investigation into Aggregate Electric Utility Reserve Margins Planned for Peninsular Florida; FPSC Docket No. 981890-EI

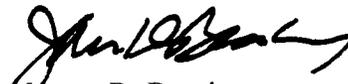
Dear Ms. Bayo:

Enclosed for filing in this docket are the original and fifteen (15) copies of Tampa Electric Company's Motion for Extension of Time to File Rebuttal Testimony.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

AFA 2 JDB/pp
APP _____ Enclosures
CAF _____
CMU _____
CTR _____
EAG _____
LEG 1 _____
MAS 5 _____
OPC _____
PAI 2 _____
SEC 1 _____
WAW _____
OTH _____

cc: All Parties of Record (w/enc.)

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10860 SEP-99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into the)
aggregate electric utility reserve)
margins planned for Peninsular)
Florida.)
_____)

DOCKET NO. 981890-EU
FILED: September 9, 1999

**TAMPA ELECTRIC COMPANY'S
MOTION FOR EXTENSION OF TIME
TO FILE REBUTTAL TESTIMONY**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Florida Administrative Code Rule 28-106.204 (without waiving its continued position that the conduct of this investigation as a proceeding to determine substantial interests is improper), moves the Commission for an extension of the rebuttal testimony filing date from September 13, 1999 to October 4, 1999. As grounds therefor, the company states:

1. The scheduling of Staff's testimony so close to the September 13, 1999 rebuttal due date provides very little time for Tampa Electric to prepare and submit rebuttal testimony. As is pointed out in the Motion for Extension of Time filed by Florida Power & Light Company, parties wishing to rebut Tampa Electric and other parties have been given 28 days for their rebuttal testimony preparation whereas parties desiring to rebut Staff testimony are given only 13 days. This is unreasonable and places Tampa Electric at an unfair disadvantage.

2. Tampa Electric is requesting a three week extension to secure the additional time needed to address Staff's and other parties' direct testimony. The company needs a reasonable amount of time within which to analyze Staff's data sources, the analysis they performed to reach their conclusions and other bases for the broad conclusions reached in Staff's testimony. The current schedule does not permit time for needed discovery relative to the broad conclusions reached in Staff's testimony.

DOCUMENT NUMBER-DATE

10860 SEP-99

FPSC-RECORDS/REPORTING

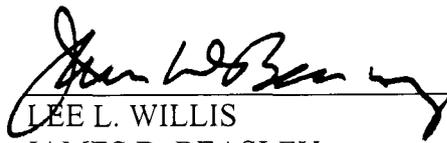
3. The requested extension of time to file rebuttal testimony will not prejudice any party to this proceeding. The requested three week extension until October 4 will still result in rebuttal testimony being filed more than four weeks prior to hearing. Each party will have adequate time to prepare for hearing and the Commission will be better served by rebuttal testimony that is not hastily prepared without a thorough review of Staff's conclusions.

4. Tampa Electric has attempted to consult the parties to this proceeding. Florida Power & Light Company does not object to the extension. FIPUG does not object so long as the deadline for all rebuttal is extended three weeks, i.e., until October 4. LEAF could not be reached. The Duke entities object to the extension unless some provision is made for expedited discovery related to rebuttal testimony. Tampa Electric has not been able to reach any of the other parties to this proceeding to discuss the motion.

WHEREFORE, Tampa Electric respectfully moves the Commission to extend the rebuttal testimony filing deadline in this proceeding by three weeks from September 13 to October 4, 1999.

DATED this 9th day of September 1999.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion for Extension to File Rebuttal Testimony, filed on behalf of Tampa Electric Company, has been served by U. S. Mail or hand delivery(*) on this 9th date of September 1999 to the following:

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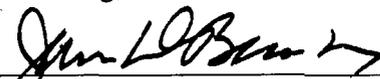
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