

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination )
of Need for an Electrical Power )
Plant in Okeechobee County by )
Okeechobee Generating Company, )
L.L.C. )

DOCKET NO. 991462-EU

Submitted for filing: November 3, 1999

FLORIDA POWER CORPORATION'S JOINDER IN FP&L'S
REQUEST FOR EXTENSION OF TIME TO FILE TESTIMONY

Florida Power Corporation ("FPC") hereby moves, pursuant to Rule 28-106.204 F.A.C.,
for an extension of time to file testimony, joining in Florida Power and Light Company's
("FP&L") motion in this matter. As grounds for its motion, FPC incorporates the grounds stated
by FP&L in its motion and further states as follows:

1. As noted in FPC's Motion to Expedite Discovery, this case is on an extremely
accelerated schedule. Okeechobee Generating Company, L.L.C. ("OGC") filed its petition for a
determination of need for a nominal 550 MW "merchant plant" on September 24, 1999. More
than a month later, on October 25, 1999 - just over one week ago - OGC filed and served
extensive testimony in support of its need petition, together with two bound volumes describing
complex impact studies performed in connection with its proposed "merchant" power plant.

2. FPC faces the prospect of having to file testimony in this docket on November 8,
1999 - just a few days from now. In short, FPC will be hard pressed to respond to OGC's
testimony in the time allotted.

3. Further, FPC has not had the opportunity to conduct discovery. FPC served but
has not received responses to its initial written discovery. The current compressed schedule

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makes it impossible for FPC to obtain responses to written discovery or to conduct depositions before filing its testimony unless the Commission affords FPC some relief from the current November 8<sup>th</sup> deadline.

4. Finally, the Commission's November 16, 1999 agenda conference will more than likely put before the Commission (or panel) two pending requests for relief – FPC's Emergency Petition for Rule Waiver and Request for Stay (along with FP&L's joinder), and FPC's and FP&L's respective Motions to Dismiss OGC's need petition. The Motions to Dismiss, if granted, would be dispositive and the Stay, if granted, would relieve the parties from the current schedule. It makes sense, then, to permit the Commission to consider and decide these matters before FPC must file its testimony in this docket.

5. Undersigned counsel has contacted counsel for the Petitioner and is authorized to state that Petitioner's counsel objects to the requested extension of time. Counsel for FP&L and LEAF have no objection to FPC's request.

WHEREFORE, FPC requests an extension of time to file testimony in this matter by joining FP&L in its request for relief.

Respectfully submitted,

FLORIDA POWER CORPORATION

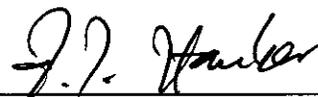
*by Fred James Sasso*  
GARY L. SASSO

Florida Bar No. 622575  
Carlton, Fields, Ward,  
Emmanuel, Smith & Cutler  
Post Office Box 2861  
St. Petersburg, FL 33731  
Telephone: (727) 821-7000  
Telecopier: (727) 822-3768

JAMES A. McGEE  
Senior Counsel  
FLORIDA POWER CORPORATION  
P.O. Box 14042  
St. Petersburg, Florida 33733  
Telephone: (727) 820-5184  
Facsimile: (727) 820-5519

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing FLORIDA POWER CORPORATION'S JOINDER IN FP&L'S REQUEST FOR EXTENSION OF TIME TO FILE TESTIMONY has been furnished by facsimile and U.S. Mail to Robert Scheffel Wright and John Moyle as counsel for Petitioner Okeechobee Generating Company and by U.S. Mail to all other following counsel of record this 31 day of November, 1999.



Attorney

COUNSEL OF RECORD:

Robert Scheffel Wright  
John T. LaVia  
Landers & Parsons, P.A.  
310 West College Avenue  
Tallahassee, FL 32301  
Phone: (850) 681-0311  
Fax: (850) 224-5595  
Attorneys for Okeechobee Generating  
Company, L.L.C.

John Moyle  
Moyle Flanigan, Katz, et al.  
210 S. Monroe Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: (850) 681-8788  
Attorneys for Okeechobee Generating  
Company, L.L.C.

Sanford L. Hartman  
Okeechobee Generating Company, L.L.C.  
PG&E Generating Company  
7500 Old Georgetown Road  
Bethesda, MD 20814  
Phone: (301) 280-6800  
Fax:

Matthew M. Childs  
Charles A. Guyton  
Steel Hector  
215 South Monroe Street, Ste. 601  
Tallahassee, FL 32301-1804  
Telephone: (850) 222-2300  
Fax: (850) 222-7150  
Attorneys for Florida Power & Light Company

Sean J. Finnerty  
PG&E Generating Company  
One Bowdoin Squaren Road  
Boston, MA 02114-2910

Regional Planning Council #07  
Douglas Leonard  
P.O. Drawer 2089  
Bartow, FL 33830  
Phone: (941) 534-7130  
Fax: (941) 534-7138

Michelle Hershel  
Post Office Box 590  
Tallahassee, FL 32302  
Phone: (850) 877-6166  
Fax: (850) 656-5485  
Attorney for Florida Electric Cooperative  
Assoc.

Department of Environmental Protection  
Scott Goorland  
2600 Blairstone Road  
Tallahassee, FL 32399-2400  
Phone: (850) 487-0472

Kenneth Hoffman/John Ellis  
Rutledge Law Firm  
Post Office Box 551  
Tallahassee, FL 32302-0551  
Phone: (850) 681-6788  
Fax: (850) 681-6515  
Attorneys for City of Tallahassee

Florida Industrial Cogeneration Association  
c/o Richard Zambo, Esq.  
598 Sw Hidden River Avenue  
Palm City, FL 34990  
Phone: (561) 220-9163  
Fax: (561) 220-9402

Legal Environmental Assistance  
Foundation, Inc.  
Gail Kamaras/Debra Swin  
1114 Thomasville Road, Ste. E  
Tallahassee, FL 32303  
Phone: (850) 681-2591  
Fax: (850) 224-1275

Paul Darst  
Department of Community Affairs  
Division of Local Resource Planning  
2740 Centerview Drive  
Tallahassee, FL 32399-2100  
Phone: (850) 488-8466  
Fax: (850) 921-0781

Myron Rollins  
Black & Veatch  
Post Office Box 8405  
Kansas City, MO 64114  
Phone: (913) 458-7432  
Fax: (913) 339-2934

James Beasley/Lee Willis  
Ausley Law Firm  
Post Office Box 391  
Tallahassee, FL 32302  
Phone: (850) 224-9115  
Fax: (850) 222-7560  
Attorneys for Tampa Electric Company

Florida Power & Light Company (Miami)  
William G. Walker, III  
9250 W. Flagler Street  
Miami, FL 33174  
Phone: (305) 552-4327  
Fax: (305) 552-3660

Ms. Angela Llewellyn  
Tampa Electric Company  
Regulatory and Business Strategy  
Post Office Box 111  
Tampa, FL 33601-0111  
Phone: (813) 228-1752  
Fax: (813) 228-1770