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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by Allied Universal Corporation and Chemical Formulators, Inc. against Tampa Electric Company

Docket No. 000061-EI

Response to Allied/CFI's Motion for Continuance of Final Hearing and Motion for Extension of Time for Filing of Rebuttal Testimony and Exhibits

Odyssey Manufacturing Company (Odyssey) responds to the above-referenced motion as follows: .

1. Prior to filing the above-referenced motion, counsel for the Complainants advised the undersigned that counsel for Tampa Electric Company did not oppose their request for continuance and extension of time. On that basis, and as a professional courtesy, the undersigned counsel agreed not to oppose the requested continuance and extension of time. Said motion as filed indicates that counsel for Tampa Electric Company ultimately decided to oppose the motion and request. As a professional courtesy, Odyssey will nonetheless not oppose a continuance of the hearing and an extension of time for filing rebuttal testimony and exhibits. Odyssey requests that any adjustment in the case schedule preserve a reasonable opportunity after the filing of rebuttal testimony and exhibits for depositions of rebuttal witnesses.
2. Having discussed the matter with counsel for Tampa Electric Company's counsel, Odyssey supports the substantive matters raised in Tampa Electric Company's forthcoming response to the Complainants' motion. Odyssey also disputes the Complainants' assertion of any substantive significance regarding the confidentiality agreements between Sentry Industries, Inc. and Odyssey Manufacturing Company and Tampa Electric Company and the protection thereby afforded proprietary confidential business information.

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Attorney for Odyssey Manufacturing Company

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent by U.S. Mail to Harry W. Long, Jr., Esq., TECO Energy, Inc., P.O. Box 111, Tampa, FL 33601; John R. Ellis, Esq. and Kenneth A. Hoffman, Esq., Rutledge, Ecenia, Purnell & Hoffman, 215 S. Monroe St., Suite 420, Tallahassee, FL 32301; James D. Beasley, Esq. and Lee L. Willis, Esq., Ausley & McMullen, 227 S. Calhoun St., Tallahassee, FL 32301; Patrick K. Wiggins, Esq., Wiggins & Villacorta, 2145 Delta Blvd., Suite 200, Tallahassee, FL 32303; Scott J. Fuerst, Esq., Ruden McClosky, 200 East Broward Blvd., Ft. Lauderdale, FL 33301; and by hand-delivery to Marlene K. Stern, Esq., Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, on this 5th day of October, 2000.


Wayne L. Schiefelbein