

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
JOHN R. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
MARTIN P. McDONNELL

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

J. STEPHEN MENTON
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE
GOVERNMENTAL CONSULTANTS
MARGARET A. MENDUNI
M. LANE STEPHENS

April 23, 2001

By Hand Delivery

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, FL 32399-0850

ORIGINAL
RECORDS AND REPORTING
01 APR 23 PM 4:03
RECEIVED-1 1930

Re: Docket No.000061-EI

Dear Ms. Bayo:

Enclosed for filing on behalf of Allied/CFI are the original and fifteen copies of Allied/CFI's Motion for Extension of Time to Request Confidential Classification.

Please acknowledge this filing by date stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

John R. Ellis
John R. Ellis

JRE/sy
Enclosure

cc: Parties of Record

- APP _____
- CAF _____
- CMP _____
- COM 3
- CTR _____
- ECR _____
- LEG 1
- OPC _____
- PAI _____
- RGO _____
- SEC 1
- SER _____
- OTH _____

RECEIVED & FILED
14
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
05067 APR 23 01
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal)
Corporation and Chemical Formulators,)
Inc. against Tampa Electric Company)
for violation of Sections 366.03,)
366.06(2) and 366.07, Florida Statutes,)
with respect to rates offered under)
Commercial/Industrial Service Rider tariff;)
petition to examine and inspect confidential)
information; and request for expedited)
relief.)
_____)

Docket No. 000061-EI

Filed: April 23, 2001

**ALLIED/CFI'S MOTION FOR EXTENSION OF TIME
TO REQUEST CONFIDENTIAL CLASSIFICATION**

Allied Universal Corporation ("Allied") and its affiliate, Chemical Formulators, Inc. ("CFI") (collectively "Allied/CFI"), by and through their undersigned counsel, and pursuant to Rule 28-106.204, Florida Administrative Code, move for an extension of time of seven days, to and including May 1, 2001, in which to request confidential classification of the deposition testimony of four Allied/CFI witnesses, and state:

1. The Settlement Agreement between Allied/CFI and Tampa Electric Company ("TECO") provides for the admission into the record of the deposition testimony of eleven witnesses in this proceeding. Pursuant to the agreement of counsel for the parties, each party intends to request confidential classification of appropriate sections of the deposition testimony of its affiliated witnesses, consistent with prior Orders in this proceeding governing the confidential classification of testimony and other information.

2. The Settlement Agreement was approved by the Commission on April 3, 2001. Rule 25-22.006(3)(a), Florida Administrative Code, provides a period of 21 days within which a party

DOCUMENT NUMBER-DATE

05067 APR 23 01

FPSC-RECORDS REPORTING

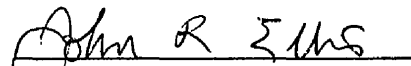
may request confidential classification of proprietary confidential business information pursuant to Section 366.093, Florida Statutes, after having given notice of intent to do so. Thus, it appears that the relevant 21-day period extends to and including April 24, 2001.

3. Allied/CFI has proceeded diligently with the preparation of a request for confidential classification of appropriate sections of the deposition testimony of its four affiliated witnesses. However, the task of reviewing the testimony has proven to require more time than was originally anticipated. As a result, Allied/CFI requests a brief extension of time of seven days in which to request confidential classification of the deposition testimony of Allied/CFI witnesses Robert M. Namoff, James W. Palmer, Pete DeAngelis, and Dr. Charles F. Phillips, Jr.

4. Allied/CFI is informed and believes that all parties to this proceeding have agreed to a mutual extension of seven days' time for this purpose, and that no prejudice would result from the granting of the requested extension. TECO previously has moved for the same extension.

WHEREFORE, Allied/CFI requests an extension of time of seven days, to and including Tuesday, May 1, 2001, in which to request confidential classification of appropriate sections of the deposition testimony and related exhibits of Allied/CFI witnesses Robert M. Namoff, James W. Palmer, Pete DeAngelis, Dr. Charles F. Phillips, Jr.

Respectfully submitted,



Kenneth A. Hoffman, Esq.

John R. Ellis, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

(850) 681-6788 (Telephone)

(850) 681-6515 (Telecopier)

Daniel K. Bandklayder, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Allied/CFI's Motion for Extension of Time to Request Confidential Classification was furnished by U. S. mail to the following this 23th day of April 2001.

Robert V. Elias, Esq.
Marlene Stern, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Lee L. Willis, Esq.
James D. Beasley, Esq.
Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301

Harry W. Long, Jr., Esq.
TECO Energy, Inc.
Legal Department
P. O. Box 111
Tampa, FL 33601

Patrick K. Wiggins, Esq.
Katz, Kutter, Haigler, Alderman,
Bryant & Yon, P.A.
106 E. College Avenue
Tallahassee, FL 32301

Wayne L. Schiefelbein, Esq.
P. O. Box 15856
Tallahassee, FL 32317-5856

Scott J. Fuerst, Esq.
Ruden, McClosky, et al.
200 East Broward Blvd.
Ft. Lauderdale, FL 33301

John L. Wharton
Rose, Sundstrom & Bentley
2548 Blairstone Pines Drive
Tallahassee, FL 32301



JOHN R. ELLIS