

## ORIGINAL

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Matthew M. Childs, P.A.

July 23, 2001

Ms. Blanca S. Bayó
Director, Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

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Re: Docket Nos. 001148-EI, 010577-EI and 000824-EI

Dear Ms. Bayó:

Enclosed please find the original and seven (7) copies of Florida Power & Light Company, Tampa Electric Company and Florida Power Corporation's Joint Motion To Partially Alter Dates For Filing Testimony in Docket Nos. 001148-EI, 010577-EI and 000824-EI.

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Respectfully submitted,

Matthew M. Childs, P.A.

MMC/gc

MMC/gc

Enclosures

E I

DOCUMENT NUMBER - DATE

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power & Light Company's	)	
Merger with Entergy Corporation, the formation of	)	Docket No. 001148-EI
a Florida transmission company (Florida Transco)	)	
and their effect on FPL's retail rates	)	
In re: Review of Tampa Electric Company and impact	)	Docket No. 010577-EI
of its participation in GridFlorida, a Florida transmission	)	
company, on TECO's retail ratepayers	)	
In re: Review of Florida Power Corporation's earnings,	)	
including effects of proposed acquisition of Florida Power	)	Docket No. 000824-EI
Corporation by Carolina Power & Light	)	
	)	Filed: July 23, 2001

## JOINT MOTION TO PARTIALLY ALTER DATES FOR FILING TESTIMONY

Florida Power & Light Company ("FPL"), Tampa Electric Company ("TEC") and Florida Power Corporation ("FPC") ("Joint Applicants") hereby request that the Prehearing Officer issue an order extending the date for filing a portion of their testimony and exhibits from July 30, 2001 until August 15, 2001, as herein further explained, and extend the remaining date(s) for filing testimony. In support of the Joint Motion Joint Applicants state:

- 1. Order No. PSC-01-1372-PCO-EI called for the filing of testimony by the Joint Applicants by July 30, 2000.
- 2. Recent developments have hindered the Joint Applicants' ability to meet the filing date of July 30<sup>th</sup>. The Federal Energy Regulatory Commission (the "FERC") issued an order requiring initiation of a mediation process directed toward forming a single Regional Transmission Organization for the Southeast region of the United States. On July 17, 2001, the mediator appointed by the FERC held a settlement conference initiating a 45-day settlement

period requiring frequent and intensive interaction between the interested parties. The order issued by the FERC encouraged the parties to the FERC docket involving GridFlorida LLC to participate in this process.

- 3. The process initiated by this recent FERC Order will impact GridFlorida LLC. The Joint Applicants need to participate in this mediation process to assure that concerns and the potential impact on GridFlorida are addressed recognizing that the appointed mediator must file a report with the FERC within ten days following the settlement period that includes an outline of a proposal to create a single Southeastern region RTO, milestones for completion of intermediate steps, and a deadline for submitting a joint proposal.
- 4. This development at FERC is significant to GridFlorida LLC. To adequately participate in this mediation process and evaluate developments will require substantial commitment of resources. The same people who are currently supporting participation by the Joint Applicants in this proceeding before the Florida Public Service Commission including the preparation of testimony will now have to also participate in the FERC mediation process and they simply cannot do that effectively without the requested change to the schedule for filing testimony.
- 5. Because of the impact of the FERC mediation, the Joint Applicants request that they be authorized to file cost information, background and other factual data associated with GridFlorida LLC (in the form of prepared testimony and exhibits) on July 30, 2001, as currently scheduled but the balance of the filing be extended until August 15, 2001. Because of their request for this deferral, the Joint Applicants also propose that the remaining testimony filing dates be extended accordingly but do not propose any other changes to the schedule for Phase I in these Dockets.

6. The Joint Applicants have attempted to contact the parties to these dockets and represent: Counsel for the Office of Public Counsel, FIPUG, Dynegy Midstream Services, LP, the Twomeys and FMPA respectively state no objection; counsel for Enron takes no position on the motion; counsel for Duke, Mirant, Calpine Reliant, Florida Retail Federation, CPV&PGE have been contacted and have not stated a position at the time of this filing.

WHEREFORE, Joint Applicants respectfully request that the Prehearing Officer enter an order extending the date for filing a portion of their testimony and exhibits from July 30, 2001 until August 15, 2001 as herein set forth and extend the remaining dates for filing testimony so other participants are not adversely affected.

Respectfully submitted,

Matthew M. Childs, P.A.

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James A. McGee

Attorney for Florida Power Corporation

Harry W Long, Jr.

Lee L Willis and

Jandés D/Beasley

Attorneys for Tampa Electric Company

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Joint Motion to Partially Alter Dates for Filing Testimony has been served by Hand Delivery (\*) or U. S. Mail this 23rd day of July, 2001 to the following:

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