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August 14, 2001

### HAND DELIVERED

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

Re: Determination of regulated earnings of Tampa Electric Company pursuant to stipulations for calendar years 1995 through 1999; FPSC Docket No. 950379-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Motion for Extension of Time to Complete Discovery.

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

JDB/pp Enclosures

cc: Prehearing Officer Braulio L. Baez (w/enc.)
All Parties of Record (w/enc.)

DOCUMENT NUMBER-DATE

09925 AUG 146

FPSC-COMMISSION CLERK

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of Regulated Earnings	)	DOCKET NO. 950379-EI
of Tampa Electric Company Pursuant to	)	
Stipulations for Calendar Years 1995	)	FILED: August 14, 2001
through 1999.	)	-
	)	

# TAMPA ELECTRIC COMPANY'S MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY

Tampa Electric Company ("Tampa Electric" or "the company") moves the Prehearing Officer for an extension of time within which to complete discovery, through and including the conclusion of the telephonic deposition of Office of Public Counsel's ("OPC") witness, Hugh Larkin, scheduled to commence on August 17, 2001 and, as grounds therefor, says:

- 1. On or about July 25, 2001 counsel for Tampa Electric and OPC agreed to schedule Mr. Larkin's deposition for August 17, to be conducted via telephone conference after the conclusion of the Prehearing Conference also scheduled for August 17.
- 2. On this date the parties realized that the Commission's order establishing procedure, Order No. PSC-01-0629-PCO-EI, issued March 14, 2001, states that, unless authorized by the Prehearing Officer for good cause shown, all discovery shall be completed by August 13, 2001. That completion date was inadvertently overlooked by the parties when the deposition was scheduled.
- 3. Conducting Mr. Larkin's deposition as scheduled on August 17 may assist the parties and the Commission in better understanding the issues in this case and will not disadvantage or prejudice any party or the Commission. Tampa Electric has been authorized to

state that OPC does not object to going forward with Mr. Larkin's deposition as scheduled commencing on August 17, 2001 after the conclusion of the Prehearing Conference. The undersigned has attempted on several occasions this date to reach Staff Counsel regarding this Motion, but was unable to do so.

WHEREFORE, Tampa Electric moves the Commission, through its Prehearing Officer, for a brief extension of time through and including the conclusion of the deposition of Mr. Larkin now scheduled for August 17, 2001 within which to complete discovery.

DATED this 14th day of August 2001.

Respectfully submitted,

LEE'L. WILLIS

JAMES D. BEASLEY and

KENNETH R. HART

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## CERTIFICATE OF SERVICE

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