

JACK SHREVE PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison St. Room 812 Tallahassee, Florida 32399-1400 850-488-9330



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CUMMISSION CLERK

December 18, 2001

Ms. Blanca S. Bayó, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0870

RE: Docket No. 010949-EI

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Citizens' Request for Extension of Time to File Testimony in the above-referenced docket.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Stephen C. Burgess Deputy Public Counsel

SCB/dsb Enclosures

APP CAF CMP COM 5 CTR ECR LEG OPC PAI RGO SEC SER OTHCIDNA ITA

RECEIN LEAU OF RECORDS

DOCUMENT NUMBER-DATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Request for Rate Increase by Gulf Power Company

Docket No.: 010949-EI Date: December 18, 2001

REQUEST FOR EXTENSION OF TIME TO FILE TESTIMONY

The Citizens' of the State of Florida, through their attorney, the Public Counsel, pursuant to Rule 28-106.204, Florida Administrative Code, hereby request the Public Service Commission to extend by six days the due date for Intervenor testimony, from December 21,2001, to December 27, 2001, as well as an equal extension for all testimony that follows. The Citizens submit:

1. Through Order No. PSC-01-2035-PCO-EI, the Commission scheduled Intervenor testimony to be filed on December 21, 2001, Staff testimony on January 8, 2002, and rebuttal testimony on January 16, 2002.

2. Due to various problems, the Citizens are encountering considerable difficulty meeting the December 21, 2002 due date for filing Intervenor testimony.

3. The Citizens seek a six day extension for filing testimony, which would change the due date to December 27, 2001. The Citizens further seek a corresponding six-day extension for Staff testimony and rebuttal testimony. Those extensions would result in due dates of January 14 for Staff and January 22 for rebuttal.

4. Counsel for each of the parties has been contacted. PSC Staff did not take a position, and each of the other parties authorized the Citizens to represent that the respective party had no objection.

DOCUMENT NUMBER-DATE

WHEREFORE, the Citizens of the State of Florida respectfully request the commission to grant the extensions of time to file testimony, as specified in this motion.

Respectfully Submitted,

- Oon

Stephen C. Burgess Deputy Public Counsel

CERTIFICATE OF SERVICE DOCKET NO. 010949-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Citizens' Request for Extension of Time to file Testimony has been furnished by hand-delivery(*) or U.S. Mail to the

following parties on this 18th day of December, 2001.

Marlene K. Stern, Esquire* Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Jeffrey A. Stone, Esquire Russell A. Badders, Esquire Beggs & Lane Post Office Box 12950 Pensacola, Florida 32576-2950

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