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December 21, 2001

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

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COMMISSION
CLERK

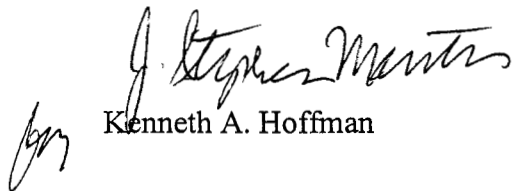
Re: Docket No. 011622-GU

Dear Ms. Bayo:

Enclosed for filing on behalf of Withlacoochee River Electric Cooperative, Inc. ("WREC") are the original and fifteen copies of WREC's Agreed Motion for Extension of Time to File Motion to Dismiss in the above-referenced docket.

Please acknowledge receipt of these documents by date-stamping the enclosed copy of this letter and returning it to the undersigned.

Sincerely,


Kenneth A. Hoffman

KAH/rl
Enclosures
cc: Parties of Record

- APP _____
 - CAF _____
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DOCUMENT NUMBER-DATE
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination that the rate structure of Withlacoochee River Electric Cooperative, Inc. is discriminatory, interferes with approved energy conservation programs, and is contrary to the legislative intent of the Florida Energy Efficiency and Conservation Act, by Peoples Gas System)
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Docket No. 011622-GU
Filed: December 21, 2001

**WITHLACOOCHEE RIVER ELECTRIC COOPERATIVE, INC.'S
AGREED MOTION FOR EXTENSION OF TIME
TO FILE MOTION TO DISMISS**

Withlacoochee River Electric Cooperative, Inc. ("WREC"), by and through its undersigned counsel, and pursuant to Rule 28-106.204(1), Florida Administrative Code, hereby files this Agreed Motion for an Extension of Time to file a motion to dismiss the petition filed by Peoples Gas System ("Peoples") in this proceeding. In support of this Motion, WREC states as follows:

1. On December 6, 2001, Peoples filed its petition for a determination that the rate structure of WREC is discriminatory, interferes with approved energy conservation programs, and is contrary to the legislative intent of the Florida Energy Efficiency and Conservation Act ("Petition"). Counsel for WREC understands that counsel for Peoples served a courtesy copy of the Petition on WREC by United States Mail on December 6, 2001.
2. Under Rule 28-106.204(2), Florida Administrative Code, a motion to dismiss a petition is to be filed no later than twenty days after service of the petition.
3. Counsel for WREC calculates that a motion to dismiss Peoples' Petition would currently be due December 31, 2001, when one includes the additional five days where service is

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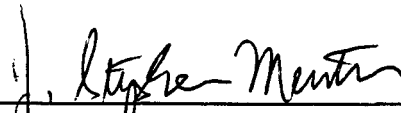
provided by mail.¹

4. The undersigned counsel was formally retained by WREC on December 19, 2001, thirteen days after filing and service of Peoples' Petition. In light of the upcoming holiday season, counsel for WREC requests an additional seven days for the filing of a motion to dismiss Peoples' Petition.

5. Counsel for WREC has conferred with counsel for Peoples and is authorized to represent that Peoples does not object to the one week extension of time requested in this Motion.

WHEREFORE, for the foregoing reasons, WREC respectfully requests that the Prehearing Officer enter an Order granting this Motion and allowing WREC up to and until January 7, 2002, for the filing of a motion to dismiss Peoples' Petition.

Respectfully submitted,



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¹See Rule 28-106.103, Florida Administrative Code.

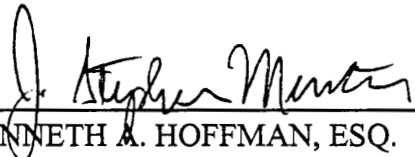
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Withlacoochee River Electric Cooperative, Inc.'s Agreed Motion For Extension of Time to File Motion to Dismiss was furnished by U. S. Mail to the following this 21 day of December, 2001:

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