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> > June 21, 2002

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

> Docket No. 020233-EI Re:

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are an original and fiftheen (15) copies of the Motion of Florida Power Corporation, Florida Power & Light Company And Tampa Electric Company For Extension of Time to File Post-workshop Comments Addressing Market Design Issues And Expansion of Page Limit to Sixty (60) Pages For Post-Workshop Comments.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" or "received" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

enthy &

Kenneth A. Hoffman

AUS CAF CMP COM KAH/kll CTR ECR GCL Enclosures OPC MMS SEC All Parties of Record cc:

FPL\Bayo062105Bltr



DOCUMENT NUMBER - DATE

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EDSC-COMMISSION CLERK

VIA HAND DELIVERY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Review of GridFlorida Regional Transmission Organization Proposal Docket No. 020233-EI Filed: June 21, 2002

MOTION OF FLORIDA POWER CORPORATION, FLORIDA POWER & LIGHT COMPANY AND TAMPA ELECTRIC COMPANY FOR EXTENSION OF TIME TO FILE POST-WORKSHOP COMMENTS ADDRESSING MARKET DESIGN ISSUES AND EXPANSION OF PAGE LIMIT TO SIXTY (60) PAGES FOR POST-WORKSHOP COMMENTS

Florida Power Corporation, Florida Power & Light Company, and Tampa Electric Company (collectively, the "GridFlorida Companies") pursuant to Rule 28-106.204, Florida Administrative Code, hereby request the Prehearing Officer to grant all parties to this Docket an extension of time of up to fourteen (14) days for the filing of Post-Workshop Comments Addressing Market Design Issues and to expand the page limit for Post-Workshop Comments to sixty (60) pages. In support of this Motion, the GridFlorida Companies state as follows:

1. Pursuant to Order No. PSC-02-0459-PCO-EI (Order Establishing Procedure), Post-

Workshop Comments are due to be filed June 21, 2002 and are limited to forty (40) pages.

2. As a result of the Pre-Workshop Comments and presentations made by Intervenors at the May 29, 2002 Commission Workshop, the GridFlorida Companies request additional time to adequately analyze and address the issues and positions raised by the Intervenors in an ongoing effort to: (a) respond to the stakeholder comments addressing market design issues; and (b) provide opportunity for resolution of issues.

3. The GridFlorida Companies also request that the Prehearing Officer expand the existing forty (40) page limit for Post-Workshop Comments to sixty (60) pages to allow sufficient pages to address market design issues.

DOCUMENT NUMBER-DATE 06414 JUN 218 FPSC-COMMISSION CLERK 4. The Prehearing Officer previously has granted a similar request by certain Intervenors for an extension of time for filing Pre-Workshop Comments and an expansion of the page limit for Pre-Workshop Comments to sixty (60) pages. <u>See</u> Order No. PSC-02-0548-PCO-EI issued April 22, 2002. The instant requests of the GridFlorida Companies are similarly reasonable and would not prejudice any party. To ensure that no party is prejudiced, the GridFlorida Companies request the Prehearing Officer to authorize any party that files Post-Workshop Comments on June 21, 2002 that address market design issues to have the opportunity to file supplemental or revised comments addressing market design issues within the time frame requested in this Motion.

5. Representatives of the GridFlorida Companies have contacted the members of the GridFlorida Stakeholder Advisory Committee on this date by electronic mail to advise said stakeholders of the filing of this Motion, the contents hereof and that the GridFlorida Companies would not be addressing market design issues in their Post-Workshop Comments filed on June 21, 2002. In addition, the undersigned counsel faxed a copy of the instant motion on June 20, 2002 to counsel for Intervenors who appeared and made presentations at the Commission's May 29, 2002 Workshop.

WHEREFORE, for the foregoing reasons, the GridFlorida Companies respectfully that the Prehearing Officer enter an order granting this Motion and allowing all parties up to and until July 5, 2002, for the filing of Post-Workshop Comments addressing market design issues; further authorizing parties that have filed Post-Workshop Comments on June 21, 2002 that address market design issues an opportunity to file supplemental or revised Post-Workshop Comments on or before July 5, 2002 to address market design issues; and, granting an expansion of the page limit for Post-Workshop Comments to sixty (60) pages.

2

RESPECTFULLY SUBMITTED this 21st day of June, 2002.

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CERTIFICATE OF SERVICE DOCKET NO. 020233-EI

I, THE UNDERSIGNED COUNSEL, HEREBY CERTIFY that a true and correct copy of the foregoing has been served via first class U.S. mail (* via hand delivery) (** via telecopier on June 20th, 2002) to the following parties listed below this 21st day of June, 2002:

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