



July 24, 2002

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

AM 8: 0;

Re: Docket No. 011605-EI

Dear Ms. Bayó:

Enclosed for filing in the subject docket are an original and fifteen copies of Florida Power Corporation's motion for a two-day extension of time to file rebuttal testimony.

Please acknowledge your receipt of the above filing on the enclosed copy of this letter and return to the undersigned. Also enclosed is a 3.5 inch diskette containing the above-referenced document in WordPerfect format. Thank you for your assistance in this matter.

Very truly yours,

James A. McGee

JAM/scc Enclosure

cc: Parties of record

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RECEIVED & FILED REAU OF RECORDS

DOCUMENT NUMPER-DATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of investor-owned electric utilities' risk management policies and procedures.

Docket No. 011605-EI

Submitted for filing: July 24, 2002

MOTION OF FLORIDA POWER CORPORATION FOR A TWO-DAY EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

Florida Power Corporation (Florida Power or the Company) hereby moves the Prehearing Officer for a two-day extension of time, from July 24, 2002 to July 26, 2002, to file rebuttal testimony with respect to the direct testimony of Todd F. Bohrmann filed on behalf of Staff on July 17, 2002. In support of this motion, Florida Power states as follows:

1. Florida Power's need for a short extension of time to file its rebuttal testimony stems from several factors. First, the time allotted for the preparation and filing of rebuttal testimony, five working days in the case of Staff's direct testimony, was very limited to begin with, particularly when the time required to receive and internally route Staff's testimony is taken into account. In addition, the breadth of Staff witness Bohrmann's testimony and exhibits, consisting of 48 pages, is extensive, which exacerbates the already limited time for preparation of rebuttal testimony. Finally, several key Florida Power employees involved in the preparation of the Company's rebuttal testimony have been unavailable for portions of this time.

2. Florida Power submits that the short two-day extension requested by this motion will not prejudice the ability of Staff or other parties to this proceeding to review and address the Company's rebuttal testimony. Florida Power commits to a DOCUMENT NUMBER DATE

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FLORIDA POWER CORPORATION FPSC-COMMISSION CLERK

same-day transmittal of its rebuttal testimony to the parties by email or fax, which should allow receipt on or before their receipt by conventional service without the requested extension of time.

3. The undersigned has contacted counsel for Staff, Public Counsel and FIPUG and has been advised that Staff has no position and Public Counsel and FIPUG have no objection to the requested extension of time.

Respectfully submitted,

FLORIDA POWER CORPORATION

Βv

James A. McGee Post Office Box 14042 St. Petersburg, FL 33733-4042 Telephone: (727) 820-5184 Facsimile: (727) 820-5519

DOCKET NO. 011605-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to the following individuals by regular U.S. Mail this 24th day of July, 2002:

Wm. Cochran Keating IV, Esquire Senior Attorney Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Robert Vandiver, Esquire Office of the Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

Lee L. Willis, Esquire James D. Beasley, Esquire Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302

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John W. McWhirter, Jr., Esquire McWhirter, Reeves, et al. P.O. Box 3350 Tampa, FL 33601

Vicki Gordon Kaufman, Esquire McWhirter, Reeves, et al. 117 S. Gadsden Street Tallahassee, FL 32301

Joseph A. McGlothlin, Esquire McWhirter, Reeves, et al. 117 S. Gadsden Street Tallahassee, FL 32301

Michael G. Briggs Reliant Energy, Inc. 801 Pennsylvania Ave., Suite 620 Washington, D. C. 20004

Attorney