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August 23, 2002

## HAND DELIVERED

DE AUG 23 PH 4: 22
COMMISSION
COMMISSION

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

Re:

Application of Cargill Fertilizer, Inc. to Engage in Self-Service Wheeling, To, From and Between Specified Points within Tampa Electric Company's Service Territory; FPSC Docket No 020898-EQ

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Motion of Tampa Electric Company for an Extension of Time in Which to Respond to the Motion of Cargill Fertilizer, Inc.'s Motion to Continue Self-Service Wheeling of Waste Heat Cogenerated Power During Resolution of Petition for Permanent Approval.

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,

RECEIVED & FILED

DOCUMENT NUMBER-DATE

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FPSC-BUREAU OF RECORDS

FPSC-COMMISSION CLERK

ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application of Cargill Fertilizer, Inc. To	)	Docket No. 020898-EQ
Engage in Self-Service Wheeling To, From and	)	
Between Specified Points Within Tampa Electric	)	Filed: August 23, 2002
Company's Service Territory.	)	
	)	

MOTION OF TAMPA ELECTRIC COMPANY FOR AN EXTENSION OF TIME IN WHICH TO RESPOND TO THE MOTION OF CARGILL FERTILIZER, INC.'S MOTION TO CONTINUE SELF-SERVICE WHEELING OF WASTE HEAT COGENERATED POWER DURING RESOLUTION OF PETITION FOR PERMANENT APPROVAL

Pursuant to Rule 28-106.204, Florida Administrative Code, Tampa Electric Company ("Tampa Electric") hereby requests a seven (7) day extension of the time in which to respond to the August 16, 2002 Motion of Cargill Fertilizer, Inc. ("Cargill") to continue self-service wheeling of waste heat cogenerated power during resolution of its pending petition for permanent approval of self-service wheeling. In support whereof, Tampa Electric says:

- 1. On September 6, 2000, this Commission issued Order No. PSC-00-1596-TRF-EQ granting Cargill's petition for self-service wheeling on an experimental basis, over a two year period ending on September 30, 2002.
- 2. On August 16, 2002, Cargill filed with this Commission a Petition For Permanent Approval Of Self-Service Wheeling Program And Request For Expedited Treatment ("Petition") and a Motion To Continue Self-Service Wheeling Of Waste Heat Cogenerated Power During Resolution Of Petition For Permanent Approval ("Motion").
- 3. Pursuant to Rule 28-106.204, Florida Administrative Code, a response to Cargill's Motion would normally be due on August 23, within seven (7) days following

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the filing of the Motion. A response to Cargill's Petition is not due until September 5, 2002.

4. Tampa Electric requires additional time in order to adequately respond to Cargill's Motion and has discussed the possibility of an extension of the response period with Counsel for Cargill. In light of the fact that the existing self-service wheeling experiment is scheduled to expire on September 30, 2002, Counsel for Cargill has agreed to an extension to August 30, 2002 for the filing of Tampa Electric's response to Cargill's Motion with the understanding that Tampa Electric will not attempt to terminate the current self-service wheeling experiment until the Commission has had an opportunity to rule on Cargill's Motion at the Commission's October 1, 2002 Agenda Conference.

WHEREFORE, Tampa Electric respectfully requests that it be granted an extension of the period in which to file its response to Cargill's Motion until August 30, 2002 with the understanding that Tampa Electric will not attempt to terminate the existing self-service wheeling experiment until the Commission has had the opportunity to rule on Cargill's Motion at its October1, 2002 Agenda Conference.

DATED this 23 day of August 2002.

Respectfully submitted,

HARRY W. LONG, JR. Assistant General Counsel Tampa Electric Company Post Office Box 111 Tampa, Florida 33601 (813) 228-1702

and

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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing Motion, filed on behalf of Tampa Electric Company, has been served by hand delivery (\*) or U. S. Mail on this Lay of August 2002 to the following:

Mary Anne Helton\*
Staff Counsel
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2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. Michael Haff\*
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