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October 9, 2002

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

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COMMISSION  
CLERK  
HAND DELIVERY

Re: Docket 020233-EI  
Motion for Extension of Time

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and fifteen copies of FMPA's Motion for Extension of Time. Also enclosed is a diskette containing an electronic version of the filing in Word format.

Sincerely yours,

Jody Lamar Finklea

JLF/taf  
Enclosures

cc: as noted on Certificate of Service

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM 5 \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
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FPSC-BUREAU OF RECORDS

DOCUMENT IN PROGRESS  
R-6-100 46601  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Review of GridFlorida** )  
**Regional Transmission** )  
**Organization (RTO) Proposal** )  
\_\_\_\_\_ )

DOCKET NO. 020233-EI  
FILED: October 9, 2002

**MOTION FOR EXTENSION OF TIME**

The Florida Municipal Power Agency (FMPA), by and through undersigned counsel, hereby files this Motion for Extension of Time and states as follows:

1. By a memorandum dated October 7, 2002, Florida Public Service Commission (the Commission) Staff has recommended in Issue "A" that the Commission should abate further proceedings in this docket in light of the automatic stay effected by the Office of Public Counsel's appeal of Order No. PSC-02-1199-PAA-EI. This matter is scheduled to be heard by the Commission at its Agenda Conference on October 15, 2002.

2. Pursuant to Order No. PSC-02-1177-PCO-EI, issued August 29, 2002, there is currently an October 11, 2002, deadline for Intervenors and Staff to file direct testimony and exhibits addressing the proposed market design aspects of the GridFlorida RTO. Pursuant to Order No. PSC-02-1251-PCO-EI, issued September 11, 2002, there is currently an October 14, 2002, deadline for Staff and parties to file responsive testimony and exhibits regarding protested PAA issues.

3. FMPA cannot know whether this proceeding will be abated prior to the October 11th and 14th filing deadlines. In light of the circumstances, the deadline for Intervenors and Staff to file direct testimony and exhibits on the proposed market design aspects of the GridFlorida RTO and the deadline for Staff and parties to file responsive testimony and exhibits regarding protested PAA issues should be extended to at least Wednesday, October 16, 2002.

4. If this proceeding is abated in accordance with Staff's recommendation, all parties' rights to file testimony with respect to market design and PAA issues should be preserved when a new schedule for this proceeding is established.

5. FMPA has attempted to contact all the parties with respect to their positions on this Motion for Extension of Time. FIPUG supports this Motion. However, no other party responded to FMPA.

WHEREFORE, FMPA respectfully requests that this Commission enter an order modifying the dates of testimony and exhibits due on October 11, 2002, and October 14, 2002, to at date not earlier than October 16, 2002.

RESPECTFULLY SUBMITTED this Ninth (9th) day of October, 2002.

FREDERICK M. BRYANT  
General Counsel

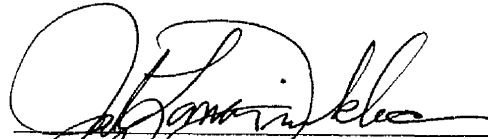


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**CERTIFICATE OF SERVICE**

I CERTIFY that a copy of the foregoing MOTION FOR EXTENSION OF TIME was furnished to the parties on the attached Service List via electronic mail on this Ninth (9th) day of October, 2002.

A handwritten signature in black ink, appearing to read "Jody Lamar Einklea", written over a horizontal line.

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