STATE OF FLORIDA

OFFICE OF THE GENERAL COUNSEL MICHAEL G. COOKE

GENERAL COUNSEL (850) 413 6199 0 1 7 PM 3: 05

COMMISSION CLERK

Hublic Service Commizzion

November 17, 2006

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

Re: Docket No. 060598-TL - Petition by BellSouth Telecommunications, Inc. pursuant to Florida Statutes 364.015(4), to Recover 2005 Tropical system Related Costs and Expenses.

Dear Ms. Bayó:

COMMISSIONERS:

J. TERRY DEASON

MATTHEW M. CARTER II

ISILIO ARRIAGA

KATRINA J. TEW

LISA POLAK EDGAR, CHAIRMAN

Enclosed for filing on behalf of Commission Staff are the original and seven copies of Staff's Motion for Leave to File Revised Testimony.

Copies are being served on the parties in this docket pursuant to the attached Certificate of Service.

Please acknowledge receipt of this filing by stamping a copy of this letter and returning same to me.

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BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition to recover 2005 tropical system DOCKET NO. 060598-TL related costs and expenses, by BellSouth Telecommunications, Inc.

NOVEMBER 17, 2006

COMMISSION STAFF'S MOTION FOR LEAVE TO FILE REVISED TESTIMONY

Commission Staff (Staff), by and through undersigned counsel, pursuant to Rule 28-106.204, Florida Administrative Code, hereby requests leave to file its testimony and as grounds therefore states:

- This matter has been scheduled for an administrative hearing on December 6, 1. 2006. Pursuant to Order Nos. PSC-06-0783-PCO-Tl, issued September 20, 2006, Commission staff filed its Direct Testimony on October 20, 2006.
- The purpose of Staff witness Winston's testimony was to sponsor the staff audit report of BellSouth Telecommunications, Inc. which addresses the Company's amended petition to recover 2005 tropical system related costs and expenses, Audit Control Number 06-255-1-1.
- Witness Winston's testimony discussed certain information requests to BellSouth which were outstanding, and did not allow Commission staff to verify costs and expenses included in BellSouth's Petition prior to the filing deadline.
- Subsequent to the filing of witness Winston's testimony, BellSouth provided Commission staff with additional materials that allowed it to continue the process of verifying the costs and expenses included in BellSouth's Petition.
- Witness Winston's revised testimony incorporates staff's findings after it 5. conducted its analysis of the additional materials provided by BellSouth.
- Staff counsel has contacted all parties to this docket. As of the filing of this 6. Motion, none have raised an objection to staff's request.

Wherefore, Commission staff moves the Prehearing Officer to accept the attached Revised Direct Testimony.

DOCUMENT NUMBER - DATE

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COMMISSION STAFF'S MOTION FOR LEAVE TO FILE REVISED TESTIMONY DOCKET NO. 060598-TL PAGE 2

Respectfully submitted this 17th day of November, 2006.

ADAM J. TEITZMA

Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION Gerald L. Gunter Building

2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

(850) 413-6199

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth Telecommunications, Inc., pursuant to Florida Statutes §364.051(4), to Recover 2005 Tropical System Related Costs and Expenses

BellSouth | DOCKET NO. 060598-TL

2005 DATED: November 17, 2006

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the one correct copy of COMMISSION STAFF'S MOTION FOR LEAVE TO FILE REVISED TESTIMONY has been furnished to the following by electronic and U. S. Mail this 17th day of November, 2006:

James Meza c/o Ms. Nancy Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, FL 32301

CompSouth Vicki Gordon Kaufman Moyle Law Firm 118 North Gadsden Street Tallahassee, FL 32301 Office of Public Counsel
Mr. Harold McLean, Esquire
Mr. Charles J. Beck, Esquire
c/o The Florida Legislature
111 West Madison Street, Room 812
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NuVox communications, Inc. Susan J. Berlin Two North Main Street Greenville, SC 29601

ADAM J/TEITZMAN

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Staff Counsel

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