

ORIGINAL

Matilda Sanders

From: Costello, Jeanne [JCostello@CarltonFields.com]
Sent: Wednesday, November 22, 2006 3:28 PM
To: Filings@psc.state.fl.us
Cc: Harold Mclean; John McWhirter, Jr.; Robert Scheffel Wright; Michael Twomey; lbennet@psc.state.fl.us
Subject: Emailing: PEF Consented Motion for Extension.pdf

Attachments: PEF Consented Motion for Extension.pdf



PEF

ed Motion for

<<PEF Consented Motion for Extension.pdf>> On behalf of Progress Energy Florida, Inc. attached for filing and service is Progress Energy Florida, Inc.'s Consented Motion for Two Week Extension of Time to Respond to Joint Motion to Sever and Abate the Portion of the Proceeding on PEF's Petition for Determination of Need for Expansion of Crystal River 3 Nuclear Plant Relating to the Manner of Future Cost Recovery.

Jeanne Costello
Legal Administrative Assistant
James Michael Walls / Dianne M. Triplett Carlton Fields
4221 W. Boy Scout Blvd., Ste. 1000
Tampa, FL 33607
Email: jcostello@carltonfields.com
Direct Dial: (813) 229-4917
Fax: (813) 229-4133
www.carltonfields.com

CMP
COM 5
CTR
ECR
GCL
OPC
RCA
SCR
SGA
SEC 1
OTH KUMP

DOCUMENT NUMBER-DATE

10769 NOV 22 06

FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: PEF's Petition for Determination)
of Need for Expansion of an Electrical)
Power Plant, for Exemption from Rule)
25-22.082, F.A.C., and for Cost Recovery)
through the Fuel Clause)
_____)

Docket No.: 060642

Submitted for Filing: November 22, 2006

**PROGRESS ENERGY FLORIDA, INC.'S CONSENTED MOTION FOR TWO-WEEK
EXTENSION OF TIME TO RESPOND TO JOINT MOTION TO SEVER AND ABATE
THE PORTION OF THE PROCEEDING ON PEF'S PETITION FOR
DETERMINATION OF NEED FOR EXPANSION OF CRYSTAL RIVER 3 NUCLEAR
PLANT RELATING TO THE MANNER OF FUTURE COST RECOVERY**

Progress Energy Florida, Inc. ("PEF") files this Consented Motion for A Two-Week Extension of Time to Respond to the Joint Motion to Sever and Abate the Portion of the Proceeding on PEF's Petition for Determination of Need for Expansion of Crystal River 3 Nuclear Plant Relating to the Manner of Future Cost Recovery ("Joint Motion"), pursuant to Rule 28-106.204, F.A.C., and as grounds states the following:

1. PEF was served with the Joint Motion, which was filed by the Office of Public Counsel ("OPC"), the Florida Retail Federation ("FRF"), and AARP, late in the afternoon on November 20, 2006. PEF's response in opposition to the Joint Motion is due November 27, 2006.


2. The Thanksgiving Day holiday is Thursday, November 22, 2006. PEF's response is therefore due the day following a four-day weekend. Given the holiday, and the fact that many employees are on vacation during this time of year, good cause exists for a two-week extension, to December 11, for PEF to respond to the Joint Motion. This extension has not been made for purposes of delaying these proceedings.

3. The undersigned counsel spoke with counsel for OPC, FRF, and AARP, and each party has consented to the two-week extension.

WHEREFORE, PEF respectfully requests that the Commission extend its time to file a response in opposition to the Joint Motion, to December 11, 2006

Respectfully submitted this 22d day of November, 2006.

R. Alexander Glenn
Deputy General Counsel
PROGRESS ENERGY SERVICE
COMPANY, LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (727) 820-5587
Facsimile: (727) 820-5519


James Michael Walls
Florida Bar No. 0706242
Dianne M. Triplett
Florida Bar No. 0872431
CARLTON FIELDS, P.A.
Post Office Box 3239
Tampa, FL 33601-3239
Telephone: (813) 223-7000
Facsimile: (813) 229-4133

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to all counsel of record and interested parties as listed below via electronic mail where indicated by

* and U.S. Mail this 21st day of November, 2006.


Attorney

<p>Lisa Bennett, Esq.* William Keating, Esq. Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Telephone: (850) 413-6230 Fax: (850) 413-6184 E-mail: lbennett@psc.state.fl.us</p>	<p>Harold McLean, Esq.* Office of the Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Phone: (850) 488-9330 Fax: (850) 488-4491 E-mail: mclean.harold@leg.state.fl.us</p>
<p>Valerie Hubbard, Director Division of Community Planning 2555 Shumard Oak Blvd. Tallahassee, FL 32399-2100 Phone: (850) 488-2356 Fax: (850) 488-3309</p>	<p>Buck Oven Michael P. Halpin Department of Environmental Regulation Siting Coordination Office 2600 Blairstone Road, MS 48 Tallahassee, FL 32301 Phone: (850) 245-8002 Fax: (850) 245-8003</p>
<p>John W. McWhirter, Jr. * McWhirter, Reeves & Davidson, P.A. 400 North Tampa Street, Ste. 2450 Tampa, FL 33602 Phone: (813) 224-0866 Fax: (813) 221-1854 Email: jmcwhirter@mac-law.com Counsel for Florida Industrial Power Users Group</p>	<p>Robert Scheffel Wright* John T. LaVia * Young van Assenderp, P.A. 225 South Adams Street, Ste. 200 Tallahassee, FL 32301 Phone: (850) 222-7206 Fax: (850) 561-6834 Email: swright@vvlaw.net Counsel for The Florida Retail Federation</p>
<p>Michael B. Twomey* P.O. Box 5256 Tallahassee, FL 32314-5256 Phone: (850) 421-9530 Fax: (850) 421-9530 Email: miketwomey@talstar.com</p>	