

Matilda Sanders

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Sent: Monday, February 12, 2007 2:25 PM
To: Filings@psc.state.fl.us
Cc: McGLOTHLIN.JOSEPH
Subject: 060162-EI
Attachments: 060162 extension motion.doc

ORIGINAL

Electronic Filing

a. Person responsible for this electronic filing:

Joseph A. McGlothlin, Associate Public Counsel
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b. Docket No. 060162-EI

In re: Petition of Progress Energy Florida, Inc. to recover modular cooling tower costs through the environmental cost recovery clause

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 3 pages.

e. The document attached for electronic filing is Motion for Extension of Time for File Testimony.

(See attached file: 060162 extension motion.doc)

Thank you for your attention and cooperation to this request.

Asha Maharaj-Lucas
Secretary to Joseph A. McGlothlin, Associate Public Counsel.
Office of Public Counsel
Telephone: (850) 488-9330
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2/12/2007

DOCUMENT NUMBER DATE
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FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Progress Energy Florida,)
Inc., to recover modular cooling tower) DOCKET NO. 060162-EI
costs through the environmental cost)
recovery clause.) February 12, 2007
_____)

CITIZENS' MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY

The Citizens of the State of Florida, by and through the Florida Office of Public Counsel, hereby request an extension of time within which to file testimony until and including March 14, 2007, and in support state:

1. The current schedule calls for Citizens to file their testimony in this docket on March 5, 2007.
2. The undersigned is involved on behalf of Citizens in FPSC Docket No. 060658-EI. If Citizens' current motion regarding the filing of Citizens' rebuttal testimony is granted (Progress Energy Florida Inc. does not object to the motion and the Commission Staff have indicated their support of the motion), Citizens must file rebuttal testimony in that docket on March 6, 2007, and prepare a prehearing statement in the same docket that is due on Monday, March 9, 2007.
3. Because of the confluence of schedules, Citizens need and request an extension of time in this docket to prepare and file their direct testimony. Citizens request an extension until and including March 14, 2007.
4. Citizens have contacted Counsel for Progress Energy Florida, Inc. ("PEF") regarding this motion. Citizens are authorized to represent that PEF does not

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FPSC-COMMISSION CLERK

object to the granting of the requested extension if it may have a similar extension to prepare rebuttal if one is needed. Citizens do not object to PEF receiving a corresponding extension of its deadline for rebuttal testimony.

WHEREFORE, Citizens respectfully move for an order extending the deadline for its direct testimony in the above docket to and including March 14, 2007.

Harold McLean
Public Counsel

s/ Joseph A. McGlothlin
Joseph A. McGlothlin
Associate Public Counsel

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

Attorney for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Citizens' Motion for Extension of Time to file Testimony has been furnished by electronic mail and U.S. Mail on this 12th day of February, 2007 to the following:

Paul Lewis
Progress Energy Florida, Inc.
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s/ Joseph A. McGlothlin
Joseph A. McGlothlin
Associate Public Counsel