

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

DOCKET NO. 080001-EI

DATED: OCTOBER 6, 2008

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MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY

The Staff of FLORIDA PUBLIC SERVICE COMMISSION (Staff), by and through its undersigned counsel, moves the Prehearing Officer, Commissioner Katrina J. McMurrian, for an extension of time to file Staff testimony regarding its proposed Issue 16D, from October 6, 2008, until and including October 13, 2008, within which to submit the testimony in the above docket, and in support states:

1. Staff's proposed issue 16D involves extensive research into prior dockets and also involves mathematical calculations supporting its position. Staff needs additional time to complete its research and prepare its testimony.
2. Staff counsel has contacted counsel for Tampa Electric Company (TECO). TECO affirms that it has no objection to allowing Staff an extension of time of one week to file its testimony, provided that TECO is granted a commensurate extension of time for filing its rebuttal testimony and for discovery to be completed. If the extensions were granted, TECO's rebuttal testimony would be due on October 24, 2008, and the discovery deadline regarding issue 16D would be extended to October 30, 2008.

3. Staff counsel has also contacted the other intervenors in this case. The Office of Public Counsel, AARP, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate –

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attorneys for Florida Industrial Power User's Group and Attorney General's Office but, as of this filing, has not yet heard from these parties.

Wherefore, Staff for the Public Service Commission respectfully requests that the deadline for filing Staff testimony regarding proposed Issue 16D be extended to October 13, 2008. To afford equal time to TECO, the rebuttal testimony for Issue 16D should also be extended to October 24, 2008 and the discovery deadline for Issue 16D should be extended to October 30, 2008.

A handwritten signature in black ink, reading "Lisa C. Bennett", written over a horizontal line.

LISA C. BENNETT
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S MOTION FOR
EXTENSION OF TIME TO FILE TESTIMONY has been served by electronic and U. S. mail to
the following by U. S. mail this 6th day of October, 2008:

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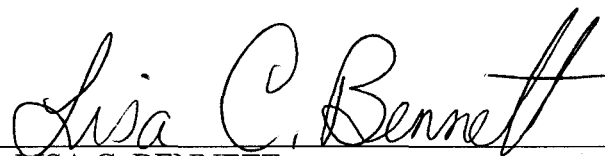
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