Eric Fryson

From: Kim Hancock [khancock@kagmlaw.com]

Sent: Thursday, March 01, 2012 12:09 PM

To: Filings@psc.state.fl.us

Cc: Charles Murphy; john.butler@fpl.com; Vicki Gordon Kaufman; Jon Moyle

Subject: Docket No. 110309-EI

Attachments: FIPUG Unopposed Motion for Extension of Time 03.01.12.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

a. The name, address, telephone number and email for the person responsible for the filing is:

> Jon C. Moyle, Jr. Keefe Anchors Gordon & Moyle 118 North Gadsden Street Tallahassee, FL 32301 (850) 681-3828

vkaufman@kagmlaw.com

- b. This filing is made in Docket No. 110309-El.
- The document is filed on behalf of Florida Industrial Power Users Group. Ċ.
- d. The total pages in the document are 3 pages.
- The attached document is The Florida Industrial Power Users Group's Unopposed Motion for Extension of e. Time to File Brief.

Kim Hancock khancock@kagmlaw.com



Keefe, Anchors, Gordon and Moyle, P.A. The Perkins House 118 North Gadsden Street Tallahassee, Florida 32301 (850) 681-3828 (Voice) (850) 681-8788 (Fax) www.kagmlaw.com

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DOCUMENT NUMBER - DATE

01197 MAR-12

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for Modernization of Port Everglades Plant, by

Florida Power & Light Company.

DOCKET NO. 110309-EI

FILED: March 1, 2012

THE FLORIDA INDUSTRIAL POWER USERS GROUP'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE BRIEF

The Florida Industrial Power Users Group (FIPUG), pursuant to rule 28-106.204, Florida

Administrative Code, files this unopposed motion for a short extension of time, until noon on

March 5th, to file its post-hearing brief in this matter. As grounds therefor, FIPUG states:

1. The Order on Procedure in this case, Order No. PSC-11-0565-PCO-EI, directs the

parties to file post-hearing briefs on March 2, 2012.

2. The Florida legislative session comes to a close next week. Activity at the

Legislature has intensified as the end of the session nears. Counsel for FIPUG is very involved

in representing clients before the Florida Legislature. Thus, due to other pressing commitments

related to legislative activity, FIPUG requests a very brief extension of time to file its brief.

3. FIPUG requests that it be permitted to file its brief no later than noon on Monday,

March 5th. This short extension will not prejudice any of the parties and will not affect the other

events scheduled in this matter.

4. Pursuant to rule 28-106.303(3), Florida Administrative Code, counsel for FIPUG

has consulted counsel for FPL and counsel for Staff and is authorized to represent that neither

FPL nor Staff object to this motion.

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DOCUMENT NUMBER - DATE

01197 MAR-12

FPSC-COMMISSION CLERK

WHEREFORE, FIPUG's request that the Commission grant it an extension of time to noon on Monday, March 5th to file its post-hearing brief.

s/ Jon C. Moyle, Jr.

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Attorneys for Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing The Florida Industrial Power Users Group's Unopposed Motion for Extension of Time to File Brief has been furnished by electronic mail and U.S. Mail this 1st day of March, 2012, to the following:

Charles Murphy Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

John T. Butler Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420

s/ Jon C. Moyle, Jr.	
Jon C. Moyle, Jr.	