



(850)521-1713
gmunson@gunster.com

February 7, 2018

E-PORTAL FILING

Ms. Carlotta Stauffer, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: DOCKET NO. 20170179-GU - Petition for rate increase and approval of depreciation study by Florida City Gas.

Dear Ms. Stauffer:

Attached, please find Florida City Gas' Motion for Extension of Time to File Rebuttal Testimony.

As always, please don't hesitate to let me know if you have any questions. Thank you for your assistance with this filing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Munson'.

Gregory M. Munson
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

cc:/ (Service List)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for rate increase and approval of
depreciation study by Florida City Gas

DOCKET NO. 20170179-GU

FILED: February 7, 2018

MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

Pursuant to Rule 28-106.204, Florida Administrative Code, Florida City Gas (hereinafter, "FCG"), hereby file their Motion for Extension of Time to File Rebuttal Testimony established by Order No. PSC-2017-0461-PCO-GU ("Revised Order Establishing Procedure"), issued December 5th, 2017, and as grounds state the following:

1. On October 23, 2017, Florida City Gas filed for approval base rate increase with the Florida Public Service Commission ("Commission"). This is the first base rate case that Florida City Gas has filed since August 15, 2003.

2. Following issuance of the initial Order Establishing Procedure on November 7, 2017, Office of Public Counsel ("OPC") and FCG filed a joint motion to modify key activity dates and discovery procedures. This motion was granted in part and resulted in the Revised Order Establishing Procedure.

3. The parties have diligently engaged in discovery in accordance with the Revised Order Establishing Procedure. OPC timely filed testimony of three witnesses on February 1, 2018, and the Federal Executive Agencies filed testimony of two witnesses on the same date. Staff testimony is due February 7, 2018. Under the Revised Order Establishing Procedure, Rebuttal testimony and exhibits are due on February 16, 2018.

4. Included in OPC's testimony was direct testimony of David E. Dismukes. According to OPC, he is not available for deposition until February 12th, 2018. After completion

of the deposition, FCG would have only three full days to prepare rebuttal testimony related to Dr. Dismukes direct testimony.

5. Dr. Dismukes testimony opposed the request by FCG for construction of an Liquefied Natural Gas (“LNG”) facility and FCG’s related explanation of its need for additional system capacity. These issues are expected to be heavily contested at hearing and are technically, practically, and legally complicated. FCG has significant questions about the meaning of Dr. Dismukes testimony that will be important in preparing rebuttal testimony.

6. Consequently, FCG seeks an extension of the due date for testimony in rebuttal to Dr. Dismukes’ direct testimony from February 16, 2018 to February 21, 2018. All rebuttal testimony not responsive to the issues raised in Dr. Dismukes direct testimony would be filed on February 16, 2018, in accordance with the Revised Order Establishing Procedure. Thus, FCG witnesses providing rebuttal testimony solely responsive to that of the Federal Executive Agencies’ witnesses, or only to OPC witnesses Willis and Garrett, would be filed on February 16, 2018. Only those witnesses whose rebuttal testimony is composed in whole, or in part, of testimony addressing matters raised in Dr. Dismukes’ testimony would be delayed until February 21, 2018.

7. This request should not unduly prejudice or burden any Party, nor Commission staff, in that FCG rebuttal testimony, other than the testimony of those witnesses responding to Dr. Dismukes, will be filed in accordance with the schedule established by the Revised Order Establishing Procedure. For the limited testimonies filed in accordance with this requested extension of time, the Parties and Commission staff will still have adequate opportunity to conduct discovery prior to the March 9, 2018, discovery cut-off given the expedited discovery

response requirement applicable to discovery pertaining to the Company's Rebuttal Testimony as set forth in the Revised Order Establishing Procedure.

8. FCG has conferred with the Parties in this matter. FCG counsel is authorized to represent that the OPC does not oppose this motion, nor do the Federal Executive Agencies.

WHEREFORE, the FCG respectfully requests that the Prehearing Officer grant the Company's request for this limited Motion for Extension of Time to File Rebuttal responsive to the direct testimony of Dr. David Dismukes.

Respectfully submitted,



Gregory Munson
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Attorneys for Florida City Gas

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing filing has been served by Hand Delivery and/or Electronic Mail this 7th day of February, 2018, upon the following:

Virginia Ponder
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison St., Rm 812
Tallahassee, FL 32399-1400

Walter Trierweiler
Danijela Janjic
Florida Public Service Commission
General Counsel's Office
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

A.J. Unsicker/L.L. Ziemann/N.A. Cepak/R.K. Moore
c/o AFLOA/JACE-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB FL 32403
andrew.unsicker@us.af.mil
ULFSC.Tyndall@US.AF.MIL
lanny.ziemann.1@us.af.mil
natalie.cepak.2@us.af.mil
ryan.moore.5@us.af.mil
Andrew.Jernigan.3@us.af.mil
ebony.payton.ctr@us.af.mil

By: _____



Beth Keating
Lila A. Jaber
Greg Munson
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706