# FILED 8/14/2018 DOCUMENT NO. 05279-2018 FPSC - COMMISSION CLERK

# AUSLEY MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

August 14, 2018

## **VIA: ELECTRONIC FILING**

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

Re: Petition for recovery of costs associated with named tropical systems during the 2015, 2016 and 2017 hurricane seasons and replenishment of storm reserve

subject to final true-up, by Tampa Electric Company

FPSC Docket No. 20170271-EI

Dear Ms. Stauffer:

Attached for filing in the above docket is Tampa Electric Company's Motion for Continuance.

Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley

JDB/pp Attachment

cc: All parties of record (w/attachment)

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for recovery of cost associated	)
with named tropical systems during the	)
2015, 2016 and 2017 hurricane seasons and	)
replenishment of storm reserve subject to	)
final true-up, by Tampa Electric Company.	)
	)

DOCKET NO. 20170271-EI

FILED: August 14, 2018

# TAMPA ELECTRIC COMPANY'S MOTION FOR CONTINUANCE

Tampa Electric Company ("Tampa Electric"), pursuant to Rule 28-106.303, Florida Administrative Code, hereby moves the Commission for a continuance of proceedings herein to allow for a hearing to be held no earlier than May 2019 and, as grounds therefor, says:

- 1. Tampa Electric is in need of additional time to process, review, and organize the voluminous amount of cost data and associated information pertaining to restoration costs in order to promote the orderly and inexpensive resolution of this docket.
- 2. A postponement of the hearing date in this docket until May 2019 will enable Tampa Electric to accomplish the foregoing without prejudicing the interests of any affected person.
- 3. Tampa Electric has conferred with all parties to this proceeding and is authorized to represent that FIPUG takes no position and OPC and FRF do not oppose this motion.

WHEREFORE, to promote the just, orderly, and inexpensive determination of all aspects of this case, Tampa Electric Company respectfully moves the Commission for a continuance of these proceedings to provide for the hearing to be conducted no sooner than May 2019, with testimony and discovery dates extended correspondingly.

# DATED this 14th day of August 2019.

Respectfully submitted,

JAMES D. BEASLEY

jbeasley@ausley.com

J. JEFFRY WAHLEN

jwahlen@ausley.com

Ausley McMullen

Post Office Box 391

Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 14th day of August 2018 to the following:

Ms. Suzanne Brownless
Mr. Kurt Schrader
Senior Attorney
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
kschrade@psc.state.fl.us

Office of Public Counsel
J. R. Kelly
Public Counsel
Patricia A. Christensen
Associate Public Counsel
Virginia Ponder
Associate Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Kelly.jr@leg.state.fl.us
Christensen.patty@leg.state.fl.us
Ponder.virginia@leg.state.fl.us

The Florida Industrial Power Users Group Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Florida Retail Federation
Mr. Robert Scheffel Wright
Mr. John T. LaVia, III
Gardner, Bist, Bowden, Bush, Dee,
LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
Schef@gbwlegal.com
Jlavia@gbwlegal.com

ATTORNEY