

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for evaluation of Hurricane Dorian storm costs, by Florida Power & Light Company.

DOCKET NO.: 20200172-EI

FILED: October 23, 2020

**MOTION TO EXTEND THE DUE DATES FOR TESTIMONY AND EXHIBITS
ESTABLISHED BY ORDER NO. PSC 2020-0311-PCO-EI**

The Citizens of the State of Florida (“Citizens”), by and through the Office of Public Counsel (“OPC”), pursuant to Rule 28-106.204, Florida Administrative Code (F.A.C.), hereby files this Motion to Extend the Due Dates for Testimony and Exhibits Established by Order No. PSC-2020-0311-PCO-EI, issued September 14, 2020, in the above dockets. The OPC requests that this motion be granted and in support thereof state, as follows:

1. On June 29, 2020, Florida Power & Light Company (“FPL”) filed its Petition for evaluation of Hurricane Dorian storm costs, along with supporting testimony.
2. On June 30, 2020, OPC filed its Notice of Intervention.
3. On September 14 2020, the Commission issued an Order Establishing Procedure, Order No. PSC 2020-0311-PCO-EI. The key activities date for the Docket were established as follows:

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| a) Utility’s testimony and exhibits | June 29, 2020 |
| b) Intervenors’ testimony and exhibits | November 30, 2020 |
| c) Staff’s testimony and exhibits, if any | December 11, 2020 |
| d) Rebuttal testimony and exhibits | January 5, 2021 |
| e) Prehearing Statements | January 15, 2021 |
| f) Prehearing Conference | February 1, 2021 |
| g) Discovery deadline | February 12, 2021 |

- h) Cross examination exhibits February 16, 2021
- i) Hearing February 23 and 24, 2021
- j) Briefs March 15, 2021

6. Pursuant to Rule 28-106.204(4), F.A.C., “Motions for extension of time shall be filed prior to the expiration of the deadline sought to be extended and shall state good cause for the request.”

7. OPC requests additional time to prepare its testimony. Discovery is ongoing and OPC only recently received the responses to its first set of discovery. OPC needs sufficient time to thoroughly analyze and assess all responses to its discovery in addition to the Company’s testimony and exhibits to ensure customers’ positions are well represented. FPL needs adequate time to conduct further necessary discovery and prepare responsive testimony.

8. The modification of the testimony deadlines will allow the parties to best utilize their limited time and resources, and fully analyze the information to present clear evidence to the Staff and Commission.

9. With collaborative effort, the OPC and FPL have reached consensus that the following deadlines appear to be workable and further believe them to be in the best interest of everyone and constitute good cause shown herein:

- a. Intervenors’ Testimony and exhibits December 8, 2020
- b. Staff Testimony and exhibits. December 22, 2020
- c. Rebuttal Testimony and exhibits January 12, 2021

10. Pursuant to Rule 28-106.204(3), F.A.C., Citizens has discussed this motion with counsel for FPL and may represent that FPL supports and consents to the granting of this motion.

WHEREFORE, the OPC hereby requests that the Prehearing Officer grant this Motion to Extend the Due Dates for Testimony and Exhibits Established by Order No. PSC-2020-0311-PCO-EI, to the dates outlined in the body of this motion, above.

Respectfully submitted,

/s/Thomas A. (Tad) David

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the forgoing has been furnished by electronic mail on this 23rd day of October 2020, to the following:

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