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May 2, 2022

BY ELECTRONIC FILING

Mr. Adam Teitzman, Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 20220010-EI: Storm Protection Plan Cost Recovery Clause

Dear Mr. Teitzman:

Attached for electronic filing on behalf of Florida Public Utilities Company, please find Florida Public Utilities Company's Motion for Extension of Time to File Projection Testimony and Exhibits in the above-referenced docket.

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

Sincerely,

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

MEK cc:(Certificate of Service)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery Clause

DOCKET NO. 20220010-EI

DATED: May 2, 2022

FLORIDA PUBLIC UTILITIES COMPANY'S MOTION FOR EXTENSION OF TIME TO FILE PROJECTION TESTIMONY AND EXHIBITS

Florida Public Utilities Company (FPUC or Company), by and through its undersigned counsel, hereby asks that the Prehearing Officer grant FPUC an extension of time, from May 2 to May 4, 2022, to file its Projection Testimony and Exhibits in the referenced Docket. In support thereof, FPUC states:

- 1. In accordance with Order No. PSC-2022-0044-PCO-EI, issued January 28, 2022, ("Order Establishing Procedure" or "OEP"), the controlling date for utilities to file their Projection Testimony and Exhibits was established as May 2, 2022. The First Order Revising Order Establishing Procedure, Order No. PSC-2022-0111-PCO-EI, issued March 14, 2022, changed certain dates in the schedule for this proceeding, but retained May 2 as the date for filing Projection Testimony and Exhibits.
- 2. FPUC has diligently endeavored to finalize its Projection filing in a timely manner; however, certain cost information that is necessary to complete the Company's projections is not yet available to the Company. The Company anticipates that the information will be available in time to complete the filing on or before May 4, 2022. In addition to the referenced cost data, the Company is also confirming information pertinent to allocations, which will also factor into the Projection filing.
- 3. This unanticipated delay in obtaining information has evolved in spite of the Company's best efforts, and the Company does not anticipate further delay to its filing beyond

Docket No. 20220010-EI

May 4. The Company was, unfortunately, unable to request this extension earlier, as it only

became fully aware of the missing information over the weekend.

4. FPUC respectfully suggests that granting the requested extension will not unduly

prejudice any party to this proceeding, nor will it impair Commission staff's ability to process

this case and prepare a complete record for Commission consideration.

5. Undersigned counsel has contacted the parties of record via email regarding this

request for extension of time. As of the time of this filing, counsels for Duke, Tampa Electric,

PCS Phosphate and the Office of Public Counsel have indicated that they either have no

objection to this request or take no position. Counsel for the other remaining parties have not yet

responded.

WHEREFORE, FPUC respectfully requests that the Prehearing Officer allow FPUC an

extension of time to file its Projection Testimony and Exhibit on or before May 4, 2022.

Respectfully submitted this 2nd day of May, 2022.

Beth Keating

Gunster, Yoakley & Stewart, P.A.

215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

Attorneys for Florida Public Utilities Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 2nd day of May, 2022.

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