



Writer's E-Mail Address: bkeating@gunster.com

November 28, 2022

**E-PORTAL**

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

**Re: Docket No. 20220067-GU-- Petition for Rate Increase by Florida Public Utilities Company, Florida Division of Chesapeake Utilities Corporation, Florida Public Utilities Company-Fort Meade, and Florida Public Utilities Company-Indiantown Division**

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida Public Utilities Company's Motion to Extend Page Limit for Post Hearing Statements and Brief.

Thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

A handwritten signature in black ink, appearing to read 'Beth Keating', with a long horizontal flourish extending to the right.

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

MEK  
Enclosure

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Florida ) DOCKET NO. 20220067-GU  
Public Utilities Company, Florida Division of )  
Chesapeake Utilities Corporation, Florida ) FILED: November 28, 2022  
Public Utilities Company - Fort Meade, and )  
Florida Public Utilities Company - Indiantown )  
Division. )

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FLORIDA PUBLIC UTILITIES COMPANY'S MOTION FOR EXTENSION OF PAGE  
LIMIT FOR POST-HEARING STATEMENTS AND BRIEFS

Florida Public Utilities Company ("FPUC" or "the Company"), by and through undersigned counsel pursuant to Rule 28-106.204, Fla. Admin. Code, files this Motion for Extension of Page Limit for Post-Hearing Statements and Briefs. In support, FPUC states the following:

1. By Order No. PSC-2022-0222-PCO-GU, issued June 17, 2022, the schedule and procedures for this case were established. Within that Order, the post-hearing procedures were set forth, which included a limitation of 75 words for post-hearing positions and page limit of 50 for the combined post-hearing statement and brief. Order at p. 10. The 50-page limit was likewise restated in the Prehearing Order, Order No. PSC-2022-0355-PHO-GU. Most relevant to this request, 70 issues were identified for hearing, all of which were contested.
2. This matter proceeding to hearing on October 25-26, 2022. Over the course of the hearing, the parties to this proceeding were able to reach Type 2 stipulations on 10 of those issues, and partial resolution of one additional issue.

3. Over the past few weeks of drafting, it has become clear to FPUC that it is not possible to provide a full and complete airing of the 60 remaining issues within the confines of a 50-page brief. While certain issues can be contained to a page or less, there is sufficient debate on other issues to necessitate more extensive analysis.
4. FPUC fully acknowledges that the Chairman asked the parties at the close of the hearing whether the 50-page limit was sufficient and that FPUC did not identify a concern at that time. Nonetheless, FPUC respectfully asks that the parties be allowed a more extended page limit to address the important issues in this proceeding.
5. Given the number of outstanding issues, as well as the requirement that both the brief and prehearing statement be combined, FPUC respectfully asks that the page limit be extended to 90 pages.
6. Undersigned counsel has conferred with counsel for both FIPUG and OPC in this regard and is authorized to represent that neither opposes this request.

**WHEREFORE**, FPUC respectfully requests that the limitation on post-hearing statements and briefs be extended to 90 pages.

Respectfully submitted this 28<sup>th</sup> day of November, 2022,

By: s/Beth Keating

Beth Keating, Esquire  
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Gunster Law Firm  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301

*Attorneys for Florida Public Utilities Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing filing has been served by Electronic

Mail this 28th day of November, 2022, upon the following:

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