

Writer's Direct Dial Number: (850) 521-1706  
Writer's E-Mail Address: bkeating@gunster.com

March 28, 2025

**VIA E-PORTAL**

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

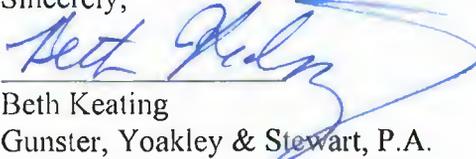
**Re: Docket No. 20250010-EI –Storm Protection Plan Cost Recovery Clause.**

Dear Mr. Teitzman:

Attached for filing, please find Florida Public Utilities Company's Motion for Extension of Time to make its 2024 True Up filing.

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. 20250010-EI

DATED: March 28, 2025

MOTION OF FLORIDA PUBLIC UTILITIES COMPANY FOR EXTENSION OF TIME TO  
FILE TRUE UP TESTIMONY AND EXHIBITS

Florida Public Utilities Company (herein “FPUC” or “Company”) hereby files this motion requesting an extension of time for the Company to file its 2024 true up testimony and exhibits for this proceeding on or before April 4, 2025. In support of this Motion, the Companies state:

1. By Order No. PSC-2025-0048-PCO-GU, issued February 10, 2025, the schedule for this proceeding was set. Pursuant to that Order, the utilities’ 2024 true up filing schedules and testimony are due April 1, 2025.

2. Due to an unforeseen confluence of events and schedules, certain key personnel involved in the completion of the schedules for this filing have been inundated with schedules and reports due for other FPUC dockets in Florida, as well as other similar filings for Chesapeake companies in other states. Consequently, completing the required filing for this proceeding on April 1 would likely result in rushed preparation without the appropriate attention to detail and oversight, which could result in errors necessitating a revised filing. Therefore, to allow sufficient time to carefully prepare the necessary forms and have them reviewed internally, FPUC respectfully requests a 3-day extension to allow it to file on April 4, 2025.

3. Undersigned counsel has conferred with counsel for the other parties to this proceeding regarding their position on FPUC’s Motion and is authorized to represent that Duke and FPL have indicated no objection, while the Office of Public Counsel, TECO, FIPUG, Nucor, and PCS Phosphate have indicated that they take no position on the Motion.

WHEREFORE, Florida Public Utilities Company respectfully requests that its Motion for Extension of Time be granted and that the Company be allowed to make its 2024 Final True Up filing, including associated testimony and exhibits, on or before April 4, 2025.

Respectfully submitted this 28<sup>th</sup> day of March, 2025, by:



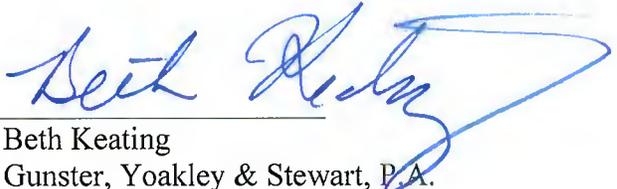
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601, Tallahassee, FL 32301  
*Attorneys for Florida Public Utilities Company*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 28th day of March, 2025:

Daniel Dose Shaw Stiller Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <a href="mailto:Ddose@psc.state.fl.us">Ddose@psc.state.fl.us</a> <a href="mailto:sstiller@psc.state.fl.us">sstiller@psc.state.fl.us</a>	J. Jeffry Wahlen/Malcolm Means/Virginia Ponder Ausley Law Firm Post Office Box 391 Tallahassee, FL 32302 <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a> <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a> <a href="mailto:vponder@ausley.com">vponder@ausley.com</a>
Walt Trierweiler/P. Christensen / Charles Rehwinkel/Mary Wessling/Octavio Ponce/Austin Watrous Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 <a href="mailto:Wessling.Mary@leg.state.fl.us">Wessling.Mary@leg.state.fl.us</a> <a href="mailto:Rehwinkel.Charles@leg.state.fl.us">Rehwinkel.Charles@leg.state.fl.us</a> <a href="mailto:Christensen.patty@leg.state.fl.us">Christensen.patty@leg.state.fl.us</a> <a href="mailto:Ponce.Octavio@leg.state.fl.us">Ponce.Octavio@leg.state.fl.us</a> <a href="mailto:Watrous.Austin@leg.state.fl.us">Watrous.Austin@leg.state.fl.us</a> <a href="mailto:Trierweiler.Walt@psc.state.fl.us">Trierweiler.Walt@psc.state.fl.us</a>	James W. Brew/Laura Baker Stone Matheis Xenopoulos & Brew, PC Eighth Floor, West Tower 1025 Thomas Jefferson Street, NW Washington, DC 20007 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a>
Christopher T. Wright Joel Baker Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 <a href="mailto:Christopher.Wright@fpl.com">Christopher.Wright@fpl.com</a> <a href="mailto:Joel.Baker@fpl.com">Joel.Baker@fpl.com</a>	Kenneth Hoffman Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301 <a href="mailto:Ken.Hoffman@fpl.com">Ken.Hoffman@fpl.com</a>
Ms. Paula K. Brown Tampa Electric Company Regulatory Affairs P.O. Box 111 Tampa, FL 33601-0111 <a href="mailto:Regdept@tecoenergy.com">Regdept@tecoenergy.com</a>	Florida Industrial Users Power Group Jon C. Moyle, Jr. Moyle Law Firm 118 North Gadsden Street Tallahassee, FL 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a>

<p>Florida Public Utilities Company Michelle Napier Jowi Baugh Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, FL 33411 <a href="mailto:Michelle_napier@chpk.com">Michelle_napier@chpk.com</a> <a href="mailto:jbaugh@chpk.com">jbaugh@chpk.com</a></p>	<p>Matthew Bernier Robert Pickels Stephanie Cuello Duke Energy 106 East College Avenue, Suite 800 Tallahassee, FL 32301 <a href="mailto:Matthew.Bernier@duke-energy.com">Matthew.Bernier@duke-energy.com</a> <a href="mailto:Robert.Pickels@duke-energy.com">Robert.Pickels@duke-energy.com</a> <a href="mailto:Stephanie.Cuello@duke-energy.com">Stephanie.Cuello@duke-energy.com</a></p>
<p>P. Mattheis/M. Lavanga/J. Briscar 1025 Thomas Jefferson St., NW Eighth Floor, West Tower Washington DC 20007 <a href="mailto:jrb@smxblaw.com">jrb@smxblaw.com</a> <a href="mailto:mkl@smxblaw.com">mkl@smxblaw.com</a> <a href="mailto:pjm@smxblaw.com">pjm@smxblaw.com</a></p>	<p>Dianne M. Triplett Duke Energy 299 First Avenue North St. Petersburg, FL 33701 <a href="mailto:Dianne.Triplett@duke-energy.com">Dianne.Triplett@duke-energy.com</a></p>

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