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November 29, 1999

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Docket No. 960545-WS

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Intervenor's Motion for More Time to Respond to Aloha's Motion to Supplement Direct Testimony.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Harold McLean  
Associate Public Counsel

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- GMU \_\_\_\_\_
- CTR **HM:bsr**
- EAG **Enclosures**
- LEG 2
- MAS 2
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- SEC 1
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

*In Re* Investigation of Utility )  
rates of Aloha Utilities, Inc. )  
In Pasco County, Florida. )  
\_\_\_\_\_ /

DOCKET NO. 960545-WS

FILED: November 29, 1999

**INTERVENORS' MOTION FOR MORE TIME  
TO RESPOND TO ALOHA'S MOTION  
TO SUPPLEMENT DIRECT TESTIMONY**

The Intervenor in this docket, the Citizens of the State of Florida, and Mike Fasano, customer intervenor move the Florida Public Service Commission for more time to respond to Aloha Utility Inc.'s (Aloha) motion to Supplement Direct Testimony and as grounds therefore say:

- 1) The referenced motion was filed and faxed to Intervenor on Monday, December 22, 1999 at 5:17 p.m.;
- 2) Applicable Rules of the Florida Administrative Code would cause the Intervenor's response to be filed on or before November 29, 1999;
- 3) Whereas the rules afford responsive pleadings to be filed within seven days following the pleading to which they respond, the scheduling of Thanksgiving holidays lessen the time between initial pleading and response in this instance to three days, i.e., Tuesday, Wednesday, and the following Monday;
- 4) The issues raised in Aloha's motion are complex and important to the respective rights of the parties, and require considerable research. Undersigned counsel urges that three working days are inadequate for the task;

- 5) Intervenor in this docket thus move the Commission for an extension for the filing of a response to the referenced motion until 5:00 pm, Thursday, December 2, 1999;
- 6) Undersigned Counsel has contacted Counsel for Aloha who advises that Aloha OPPOSES this motion.

WHEREFORE, Intervenor in this docket move the Commission for an extension for the filing of a response to the referenced motion until 5:00 pm, Thursday, December 2, 1999.

Respectfully submitted,



Harold McLean  
Associate Public Counsel

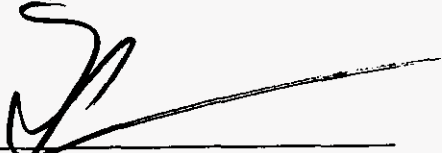
Office of Public Counsel  
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Tallahassee, FL 32399-1400

(850) 488-9330

Attorney for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE  
DOCKET NO. 960545-WS**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 29th day of November, 1999.



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Harold McLean

Ralph Jaegar  
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Fla. Public Service Commission  
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Representative Mike Fasano  
8217 Massachusetts Avenue  
New Port Richey, FL 34653