

Ruth Nettles

From: Ann Bassett [abassett@lawfla.com]
Sent: Thursday, November 01, 2007 1:36 PM
To: Filings@psc.state.fl.us
Subject: Docket 070304-EI
Attachments: 2007-11-01, 070304, Motion for Extensions of Time.pdf

The person responsible for this electronic filing is:

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
P.O. Box 15579
Tallahassee, FL 32317
(850) 222-0720
nhorton@lawfla.com

The Docket No. is 07304-EI Petition of Florida Public Utilities Company for a Rate Increase

This is being filed on behalf of Florida Public Utilities Company

Total Number of Pages is 4

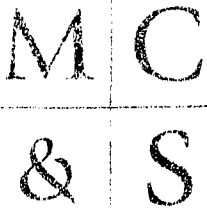
Florida Public Utilities Company's Motion for Extensions of Time

Ann Bassett
Messer, Caparello & Self, P.A.
2618 Centennial Place (32308)
P.O. Box 15579
Tallahassee, FL 32317
Direct Phone: 850-201-5225
Fax No. 850-224-4359
Email Address: <abassett@lawfla.com>
Web Address: <www.lawfla.com>

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK



MESSER CAPARELLO & SELF, P.A.

Attorneys At Law

www.lawfla.com

November 1, 2007

VIA ELECTRONIC FILING

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 070304-EI

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Public Utilities Company is an electronic version of Florida Public Utilities Company's Motion for Extensions of Time in the above referenced docket.

Thank you for your assistance with this filing.

Sincerely yours,

Norman H. Horton, Jr.

NHIII/amb

Enclosure

cc: Ms. Cheryl M. Martin
Parties of Record

DOCUMENT NUMBER-DATE

Regional Center Office Park / 2618 Centennial Place / Tallahassee, Florida 32308

Mailing Address: P.O. Box 15579 / Tallahassee, Florida 32317

Main Telephone: (850) 222-0720 / Fax: (850) 224-4359

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Florida)
Public Utilities Company)
_____)

Docket No. 070304-EI
Date Filed: November 1, 2007

MOTION FOR EXTENSIONS OF TIME

COMES NOW Florida Public Utilities Company (“the Company” or “FPUC”), and requests an extension of time to file responses to the Citizens’ First Set of Interrogatories and specific objections to Citizens’ Second Set of Interrogatories and Third Request for Production of Documents. As basis states:

1. On October 9, 2007, the Citizens served 129 interrogatories (not including sub-parts) and 81 requests for documents on FPUC. Responses to these interrogatories and requests are due thirty (30) days from date of service or November 8, 2007. In addition to this discovery, the Citizens’ and Staff have served other sets of discovery which the Company is also reviewing and developing responses. Because of the volume of requests and the resources available to respond to the request, FPUC would request additional time to and including November 14, 2007, to respond to the Citizens’ First Set of Interrogatories.

2. The Company also requests additional time to file initial specific objections to the Citizens Second Set of Interrogatories and Third Request for Production of Documents served October 17, 2007. Order No. PSC-07-0804-PCO-EI, the Order Establishing Procedure for this docket, requires that specific objections to a discovery request be made within 15 days of service of the discovery request. The effect of this requirement is that objections are due before responses rather than with responses as permitted by the Rules of Civil Procedure.

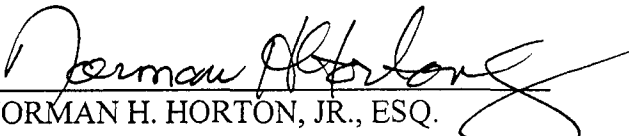
3. The Company has reviewed the referenced discovery but with the pending filing date for other discovery from Citizens, an analysis of the requests sufficient to identify specific objections has not been completed. Accordingly, FPUC would request an extension of time to and including November 8, 2007 in which to file objections.

4. Counsel has advised counsel for Citizens of this Motion and is authorized to represent that Citizens have no objection to either request. The Citizens are the only party that has intervened in the rate case.

Wherefore, Florida Public Utilities Company requests the Commission to grant the requested extensions.

Respectfully submitted,

MESSER, CAPARELLO & SELF, P. A.
Post Office Box 15579
Tallahassee, FL 32317-5579
(850) 222-0720


NORMAN H. HORTON, JR., ESQ.

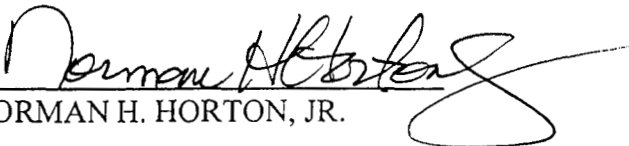
Attorneys for Florida Public Utilities Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been served by Electronic Mail this 1st day of November, 2007 upon the following:

Katherine Fleming, Esq.
Martha Brown, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
keflemin@psc.state.fl.us

Patricia A. Christensen, Esq.
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
CHRISTENSEN.PATTY@leg.state.fl.us



NORMAN H. HORTON, JR.