

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

DOCKET NO. 080001-EI

DATED: OCTOBER 13, 2008

COMMISSION
CLERK

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STAFF'S SECOND MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY

The Staff of FLORIDA PUBLIC SERVICE COMMISSION (Staff), by and through its undersigned counsel, moves the Prehearing Officer, Commissioner Katrina J. McMurrin, for an extension of time to file Staff testimony regarding its proposed Issue 16D, from October 13, 2008, until and including October 14, 2008, within which to submit the testimony in the above docket, and in support states:

1. Staff's proposed issue 16D involves extensive research into prior dockets and also involves mathematical calculations supporting its position. Staff needs an additional day to complete its research and prepare its testimony.
2. Staff counsel has contacted counsel for Tampa Electric Company (TECO). TECO affirms that it has no objection to allowing Staff an extension of time of one day to file its testimony, provided that TECO is granted a commensurate extension of time for filing its rebuttal testimony and for discovery to be completed. If the extensions were granted, TECO's rebuttal testimony would be due on October 27, 2008, and the discovery deadline regarding issue 16D would be extended to October 31, 2008.

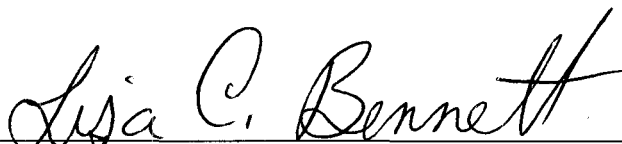
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3. Staff counsel has also contacted the other intervenors in this case. The Office of Public Counsel, AARP, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs and Florida Retail Federation all state they have no objection to the extension of times for filing Staff testimony regarding Staff's proposed issue 16D. Staff

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counsel left messages with attorneys for Florida Industrial Power User's Group and Attorney General's Office but, as of this filing, has not yet heard from these parties.

Wherefore, Staff for the Public Service Commission respectfully requests that the deadline for filing Staff testimony regarding proposed Issue 16D be extended to October 14, 2008. To afford equal time to TECO, the rebuttal testimony for Issue 16D should also be extended to October 27, 2008 and the discovery deadline for Issue 16D should be extended to October 31, 2008.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S SECOND MOTION
FOR EXTENSION OF TIME TO FILE TESTIMONY has been served by electronic and U. S.
mail to the following by U. S. mail this 13th day of October, 2008:

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