

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

DOCKET NO. 110001-EI

11 AUG 19 PM 3: 38

DATED: AUGUST 19, 2011

COMMISSION
CLERK

MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY AND EXHIBITS

The Staff of the Florida Public Service Commission (Staff), by and through its undersigned counsel, moves the Presiding Officer for an extension of time, from September 29, 2011, until and including October 6, 2011, to file Staff testimony and exhibits regarding Staff's audit of each investor-owned utility's hedging reports for Florida Power & Light Company (FPL), Progress Energy Florida, Inc. (PEF), Tampa Electric Company (TECO) and Gulf Power Company (Gulf), and states:

1. Order No. PSC-11-0132-PCO-EI, issued February 23, 2011, establishing procedure (OEP) sets forth that Staff's testimony and exhibits shall be filed by September 29, 2011, that rebuttal testimony be filed by October 6, 2011 and that the prehearing statements be filed by October 10, 2011.

2. Pursuant to Order No. PSC-08-0316-PAA-EI, issued May 14, 2008, in Docket No. 080001-EI, the Commission makes a prudence determination on a utility's hedging activities. As such, Staff will file staff audit testimony related to utility-specific hedging information reports for FPL, PEF, TECO, and Gulf.

3. Staff's audit on the utilities' hedging activities is scheduled to be finalized on September 30th. Staff needs additional time to draft, prepare and review its testimony regarding the utility-specific hedging information reports for FPL, PEF, TECO, and Gulf as well as the exhibits, if any, necessary to support Staff's testimony.

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FPSC-COMMISSION CLERK

4. Staff also requests that, if the extension is granted, the utilities' rebuttal testimony related to Staff hedging audit testimony presently due on October 6, 2011, be extended to October 13, 2011 and that the prehearing statements due October 10, 2011 be extended to October 16, 2011.

5. Staff Counsel has contacted the aforementioned utilities, and no utilities object to allowing Staff an extension of time to file its hedging testimony as well as the extension of time to file rebuttal testimony related to Staff hedging audit testimony and the extension of time to file prehearing statements.

6. Staff Counsel has also contacted the other intervenors in this case. The Office of Public Counsel, Florida Industrial Power Users Group (FIPUG), Florida Retail Federation, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate (PCS Phosphate), and Federal Executive Agencies all state they have no objection to the extensions of time.

WHEREFORE, Staff respectfully requests that the deadline for filing Staff testimony be extended to October 6, 2011, for filing rebuttal testimony to October 13, 2011 and for filing prehearing statements to October 16, 2011.

Respectfully submitted this 19th day of August, 2011.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of STAFF'S MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY AND EXHIBITS has been filed with the Office of Commission Clerk and that a true and correct copy has been furnished to the following by electronic and U. S. mail this 19th day of August, 2011:

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