

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Determination of)
Need for Citrus County Combined Cycle) DOCKET NO. 140110-EI
Power Plant)
_____)

In Re: Petition for Determination of)
Cost Effective Generation Alternative) DOCKET NO. 140111-EI
To Meet Need Prior to 2018 by)
Duke Energy Florida, Inc.) FILED: JUNE 24, 2014
_____)

**SECOND UNOPPOSED MOTION FOR ALTERNATE TESTIMONY FILING DATES BY
CALPINE CONSTRUCTION FINANCE COMPANY, L.P.**

Calpine Construction Finance Company, L.P. ("Calpine" or "CCFC"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby submits this second unopposed motion by which it respectfully asks the Commission to issue an order (or orders) establishing testimony filing dates that are extended by one week from those set forth in Order No. PSC-14-0307-PCO-EI in Docket No. 140110-EI and by Order No. PSC-14-0308-PCO-EI in Docket No. 140111-EI, both of which were issued on June 12, 2014, and both of which amended the initial Orders Establishing Procedure by extending the testimony filing dates by one week from the originally scheduled dates.

In summary, Calpine requests, with the agreement of Duke Energy Florida, with the support of PSC Phosphates and NRG Florida LP, and with no opposition by any party, that the Commission extend the dates for filing intervenor testimony,

Staff testimony, and Duke's rebuttal testimony by one week each. No prejudice to any party will result and the requested extensions will provide for better and more complete evidence, and accordingly, the Commission should grant Calpine's motion.

PROCEDURAL BACKGROUND

These companion dockets were initiated by Duke's filing the respective petitions on Tuesday, May 27, 2014. The Commission issued its Orders Establishing Procedure ("OEPs"), Order No. 14-0274-PCO-EI and Order No. PSC-14-0275-PCO-EI, on Thursday, May 29, 2014. Calpine petitioned to intervene in both dockets on May 30, 2014, and its petitions were granted on June 12, 2014. Since receiving the Company's filings on May 27, Calpine has diligently pursued discovery, having propounded four sets of interrogatories and document production requests, and the preparation of its case. Even with Duke's cooperation in providing responses to Calpine's first discovery requests on Monday, June 16, 2014, Calpine and its experts require additional time to evaluate Duke's discovery responses and to prepare Calpine's testimony and exhibits in support of its positions in these dockets.

The testimony filing dates set forth in the OEPs, as amended, are as follows:

Intervenor Testimony	July 7, 2014
Staff Testimony	July 22, 2014
Rebuttal Testimony	July 29, 2014

DISCUSSION

As before filing its first Unopposed Motion for Extension, Calpine's counsel consulted with Duke's counsel regarding this Motion. The result of this second conversation was a further agreement between Duke and Calpine that Duke would be agreeable to allowing intervenors to have until Monday, July 14, 2014, to file their testimony, provided that Duke would then have a corresponding extension to file any rebuttal testimony, and further provided that this extension would not later be used to support any request to delay the scheduled hearings in the dockets. Of course, Calpine does not object to these reasonable proposals.

Accordingly, Calpine respectfully, with Duke's agreement and without opposition by any party, moves the Commission to amend the OEPs to provide for the following testimony filing dates.

Intervenor Testimony	July 14, 2014
Staff Testimony	July 29, 2014
Rebuttal Testimony	August 5, 2014

Granting the requested extensions will not prejudice any party and will provide all parties the opportunity to prepare more complete testimony and exhibits. The requested extensions are also consistent with the discovery cutoff date (August 12, 2014) set forth in the OEPs. Accordingly, the Commission should grant this motion.

The undersigned has communicated (either by telephone or by electronic mail) with other parties and potential parties to these dockets, and is authorized to represent their positions with respect to this motion as follows. Duke Energy Florida agrees with the relief requested, provided that the requested extensions are not later used to support any request to delay the scheduled hearings in the dockets. PCS Phosphates and NRG Florida LP support the motion. The Office of Public Counsel and the Florida Industrial Power Users Group do not oppose the motion. The Commission Staff takes no position on the motion.

CONCLUSION AND RELIEF REQUESTED

The additional one-week extensions for testimony filing requested in this unopposed motion will not prejudice any party and will provide all parties the opportunity to prepare more complete testimony and exhibits. No party objects to this motion, and the extended filing dates will promote the efficient processing of these dockets.

WHEREFORE, Calpine Construction Finance Company, L.P., respectfully moves the Commission to enter its order granting this motion and modifying the testimony filing dates in these important cases as prayed herein.

Respectfully submitted this 24th day of June 2014.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following by electronic mail on this 24th day of June 2014.

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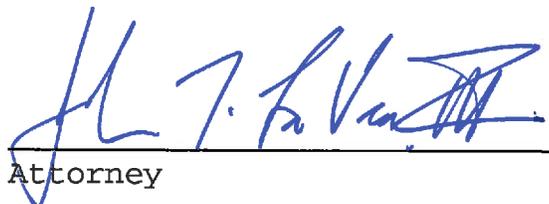
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