

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition for Review and )  
Determination on the Project Construction )  
and Gas Transportation Agreement By and ) Docket No.: 160175-GU  
Between NUI Utilities, Inc. d/b/a City Gas )  
Company of Florida and Florida Crystals ) Filed: September 1, 2016  
Corporation dated April 24, 2001 and )  
Approval of an Interim Service Arrangement )  
\_\_\_\_\_ )

**AGREED MOTION FOR  
EXTENSIONS OF TIME TO RESPOND TO MOTIONS**

Florida City Gas (“FCG”) and Florida Crystals Corporation (“Florida Crystals”), pursuant to Rule 28-106.204, Florida Administrative Code, hereby file with the Florida Public Service Commission (“PSC” or “Commission”) this Agreed Motion for Approval of Extension of Time to Respond to Motions (the “Agreed Motion”). In support of this Motion, FCG and Florida Crystals state as follows:

1. On July 22, 2016, FCG filed its Petition for Review and Determination on the Project Construction and Gas Transportation Agreement By and Between NUI Utilities, Inc. d/b/a City Gas Company of Florida and Florida Crystals Corporation dated April 24, 2001 and Approval of an Interim Service Arrangement (the “Petition”).

2. On August 5, 2016, Florida Crystals filed its Unopposed Motion to be Designated a Party, or in the Alternative, Motion to Intervene. The Commission has yet to rule on this motion, but FCG has not opposed this request.

3. On August 29, 2016, Florida Crystals filed its Motion to Dismiss the Petition. Under the rules, any response by FCG to this motion would be due on or before September 6, 2016.

4. On August 31, 2016, FCG filed its Motion for Approval of a Temporary Interim

Service Arrangement. Under the rules, any response by Florida Crystals to this motion would be due on or before September 7, 2016.

5. In view of potential weather related issues associated with Tropical Storm Hermine along with the other commitments of counsel for both parties, pursuant to Rule 28-106.204(3), Florida Administrative Code, counsel for FCG and Florida Crystals have mutually conferred and agreed to extend their respective response dates to the respective motions identified in paragraphs 3 and 4 above to on or before 5 PM on September 12, 2016. By this Agreed Motion, FCG and Florida Crystals seek the Commission's approval of the response due dates set forth herein.

6. Because counsel for Florida Crystals is presently engaged in a hearing before the Commission on an unrelated docket, undersigned counsel Mr. Self is authorized by Mr. Wright to execute and submit this Agreed Motion on behalf of Florida Crystals.

**WHEREFORE**, Florida City Gas and Florida Crystals Corporate respectfully request that the Florida Public Service Commission grant this Agreed Motion and extend the response dates to the Florida Crystals Motion to Dismiss and the FCG Motion for Approval of a Temporary Interim Service Arrangement to 5 PM on September 12, 2016.

Respectfully submitted,

s/ Robert Scheffel Wright  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished by E-

Mail on this first day of September 2016, to the following:

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