

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Matthew by Florida Power & Light Company.

DOCKET NO. 20160251-EI

FILED: April 18, 2018

CITIZENS' UNOPPOSED MOTION TO MODIFY KEY ACTIVITIES DATES AND DISCOVERY TIMEFRAMES

The Citizens of the State of Florida (Citizens), hereby file their Motion to Modify Key Activities Dates and Discovery Timeframes, and as grounds state the following:

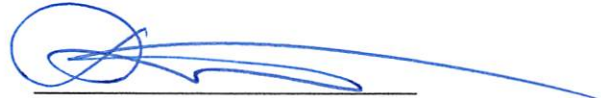
1. On April 16, 2018, OPC was served with extensive discovery. Under the current Order Establishing Procedure, discovery responses related to Intervenor Testimony are due within 5 days, on April 23, 2018. OPC's consultant is the expert witness in multiple pending dockets, two of which are set for hearing in May. As a result, OPC's consultant is subject to multiple discovery requests and other case related matters. Due to the extensive nature of the discovery and our consultant's workload, OPC is seeking an extension of time to file its responses to April 30, 2018.
2. By Order No. PSC-2017-0147-PCO-EI, issued December 15, 2017, Rebuttal Testimony is due April 25, 2018, and the discovery cutoff is May 14, 2018.
3. In the interest of justice and fairness to all parties, OPC is seeking to extend the other applicable key activities dates. Thus, OPC requests that the Rebuttal testimony due date be changed to May 2, 2018 and the discovery cutoff date be changed to May 16, 2018.

4. Citizens' Counsel conferred with the Parties to this matter. FPL has no objection to the Motion. FRF's counsel supports the Motion. FIPUG's counsel has no objection to the Motion. Commission staff counsel takes no position.

WHEREFORE, the Citizens hereby request that the Commission grant their Unopposed Motion to Modify Key Activities Dates and Discovery Timeframes, and amend the Order Establishing Procedure in accordance with the agreed upon dates and discovery timeframes, as outlined in the body of this Motion.

Respectfully Submitted

J.R. KELLY
PUBLIC COUNSEL



Patricia A. Christensen
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330

Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 18th day of April, 2018, to the following:

Suzanne Brownless
Commission Clerk
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Blvd., Room 110
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us
mbarrera@psc.state.fl.us

Ken Hoffman
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1858
ken.hoffman@fpl.com

John T. Butler
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
john.butler@fpl.com
wade.litchfield@fpl.com

Jon C. Moyle, Jr.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

Robert Scheffel Wright/John T. LaVia
Gardner Law Firm
1300 Thomaswood Drive
Tallahassee FL 32308
jlavia@gbwlegal.com
schef@gbwlegal.com



Patricia A. Christensen
Associate Public Counsel