

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm restoration costs for Florida
Power & Light Company related to Hurricane Irma

Docket No. 20180049-EI

Filed: October 29, 2018

**JOINT MOTION OF FLORIDA POWER & LIGHT COMPANY
AND OFFICE OF PUBLIC COUNSEL FOR EXTENSION OF DATES
ESTABLISHED BY ORDER NO. PSC-2018-0290-PCO-EI**

Pursuant to Section 366.076(1), Florida Statutes (2016) and Rule 28-106.204(1), Florida Administrative Code, Florida Power & Light Company (“FPL” or the “Company”) and the Office of Public Counsel (“OPC”) hereby jointly file this Motion for Extension of Dates Established by Order No. PSC-2018-0290-PCO-EI (“Joint Motion”) and respectfully request the Commission to grant the extension of dates established by Order No. PSC-2018-0290-PCO-EI (“OEP”) issued June 7, 2018 as more fully described herein. In support thereof, FPL and OPC jointly state as follows:

1. The Commission opened this docket on February 22, 2018, to evaluate FPL’s storm restoration costs related to Hurricane Irma. On June 7, 2018, the Commission issued the OEP, which set forth the procedural requirements for all parties to this docket, including the dates from which relief is sought in this Joint Motion.

2. On October 22, 2018, OPC filed its Motion for Extension of Testimony Filing Dates Established by Order No. PSC-2018-0290-PCO-EI (“OPC’s October 22, 2018 Motion for Extension”) requesting that the due date for the filing of Intervenors’ Testimony be extended from November 9, 2018 to January 11, 2019. In support of its request, OPC argued that it provided FPL a two month extension to produce documents pursuant to its First Request for Production, which was served May 18, 2018. As a result of the additional time granted to FPL to produce the documents, OPC in turn requires additional time to review the documents. OPC further advised that its consultant on this pending docket has also been retained to assist OPC in

its evaluation of the storm costs for Tampa Electric Company in Docket No. 20170271-EI, Duke Energy Florida, LLC. in Docket No. 20170272-EI, and Florida Public Utility Company in Docket No. 20180061-EI. OPC's Motion for Extension argues that because of the significant obligations of its consultant, together with the fact that FPL has produced large volumes of documents, its consultant requires additional time to review FPL's discovery responses and prepare his testimony.

3. FPL and OPC jointly agree that if OPC's request is to be granted, further extensions in the remainder of the procedural schedule are required to provide FPL adequate time to review and respond to OPC and other intervenors through its rebuttal testimony and to provide for a fair, orderly, and efficient hearing. This Joint Motion is designed to provide all parties with the time necessary to complete discovery and fully prepare their respective cases. Further, it is the intent of the parties to provide the Commission with the information and evidence necessary to fully evaluate and address FPL's Hurricane Irma storm restoration costs.

4. FPL and OPC have conferred and respectfully request modification of the OEP to reflect the following revised dates:

Intervenor Testimony and Exhibits	January 11, 2019
Staff Testimony and Exhibits	January 18, 2019
Rebuttal Testimony	March 15, 2019
Last Day to Conduct Discovery	May 20, 2019
Hearing	On or after July 15, 2019

5. FPL and OPC further agree that upon the filing of this Joint Motion, OPC will withdraw OPC's October 22, 2018 Motion for Extension.

6. FPL and OPC submit that the requested extension and revision to the dates in the OEP are fair, reasonable, will not prejudice any party to this proceeding, and should provide the

Commission with the information and evidence necessary to fully evaluate and address FPL's Hurricane Irma storm restoration costs.

7. FPL and/or OPC have conferred with the all parties to this matter and are authorized to represent that FIPUG and FRF have no objections, and the Commission Staff takes no position to the relief requested in this Joint Motion.

WHEREFORE, for the above and foregoing reasons, FPL and OPC respectfully request the Commission to grant this Joint Motion and enter an order amending the OEP to include the extended procedural schedule shown herein.

Respectfully submitted,

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