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January 6, 1995

Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32399-0850

RE: Docket No. 940620-GU Application for a rate increase by FLORIDA PUBLIC UTILITIES COMPANY.

Dear Ms. Bayo:

Enclosed for filing in the above docket are an original and 15 copies of Florida Public Utilities Company's Motion for Extension of Time.

Please acknowledge receipt of the foregoing by stamping the enclosed extra copy of this letter and returning same to my attention. Thank you for your assistance.

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Sincerely,

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HAND DELIVERY

Wayne L. Schiefelbein

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate ) Docket No. 940620-GU increase by FLORIDA PUBLIC UTILITIES ) Filed: January 6, 1995 COMPANY

## MOTION FOR EXTENSION OF TIME

Florida Public Utilities Company (FPUC), by and through undersigned counsel, requests an extension of time, until January 17, 1995, within which to furnish its answers to certain interrogatories and responses to certain document requests, and in support states as follows.

1. Staff's First Set of Interrogatories (Nos. 1-43) and First Request for Production of Documents (1-14) were served on FPUC by U.S. Mail on December 2, 1994. Answers and responses thereto are therefore due by January 6, 1995.

2. FPUC has to the best of its ability worked on the preparation of answers and responses. On January 6, 1995, FPUC hand-delivered to Staff Counsel Answers to Interrogatories Nos. 1 through 14, 16, 18 through 27, 36, 38 through 40, and 43, and responses to Requests for Production Nos. 1, 2, 5 through 8, 10, 11, 12 (partially), and 14 (partially).

3. FPUC needs an eleven-day extension of time, until Tuesday, January 17, 1995, to provide answers to Interrogatories Nos. 15, 17, 28 through 35, 37, 41 and 42, and responses to Requests for Production Nos. 3, 4, 9, 13, and the remainder of 12 and 14.

4. The undersigned counsel has contacted Staff Counsel and advised her of the need for this extension. As counsel discussed, FPUC will devote its best efforts to providing the balance of the

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, answers and responses as soon as each such answer and response is available, rather than waiting until the end of the requested extension period for their provision to Staff.

Wherefore, Florida Public Utilities Company requests an extension of time, until January 17, 1995, to provide answers to Interrogatories Nos. 15, 17, 28 through 35, 37, 41, and 42, and responses to Requests for Production Nos. 3, 4, 9, 13, and the remainder of 12 and 14.

Respectfully submitted,

WAYNE L. SCHIEFELBEIN Gatlin, Woods, Carlson & Cowdery 1709-D Mahan Drive Tallahassee, Florida 32308 (904) 877-7191

Attorneys for Florida Public Utilities Company

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on this 6th day of January, 1995 by handdelivery to VICKI D. JOHNSON, ESQ., Division of Legal Services, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32399-0863.

WAYNE L. SCHIEFELSEIN Gatlin, Woods, Carlson & Cowdery 1709-D Mahan Drive Tallahassee, Florida 32308 (904) 877-7191

Attorneys for Florida Public Utilities Company