



JAMES A. MCGEE ASSOCIATE GENERAL COUNSEL

April 29, 2002

Ms. Blanca S. Bayó, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket Nos. 020262-EI and 020263-EL

Dear Ms. Bayó:

Enclosed for filing in the subject dockets are an original and fifteen copies each of Progress Ventures, Inc.'s Motion for Protective Order and its Request for Oral Argument.

Please acknowledge your receipt of the above filing on the enclosed copy of this letter and return to the undersigned. Also enclosed is a 3.5 inch diskette containing the above-referenced documents in WordPerfect format. Thank you for your assistance in this matter.

Very truly yours,

James A. McGee

JAM/scc Enclosure

cc: Parties of record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Determine Need for an Electrical Power Plant in Martin County by Florida Power & Light Co.

Docket No. 020262-EI

In re: Petition to Determine Need for an Electrical Power Plant in Manatee County by Florida Power & Light Co.

Docket No. 020263-EI Submitted for filing: April 29, 2002

PROGRESS VENTURES, INC.'S REQUEST FOR ORAL ARGUMENT

Progress Ventures, Inc. ("PVI"), pursuant to Rule 25-22.058, F.A.C., hereby requests oral argument on its contemporaneously filed Motion for Protective Order, and respectfully submits that oral argument on its motion would be helpful to a full and complete understanding of the issues involved. PVI thus reqests the opportunity to be heard.

Respectfully submitted,

James A. McGee

Associate General Counsel

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Attorney for Progress Ventures, Inc.

DOCUMENT NUMBER-DATE

04680 APR 298

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished this ____ day of April, 2002, via U.S. Mail to the following:

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