

GATLIN, SCHEFFELBEIN & COWDERY, P.A.

Attorneys at Law

The Mahan Station
1709-D Mahan Drive
Tallahassee, Florida 32308

FILE COPY

B. KENNETH GATLIN
WAYNE L. SCHEFFELBEIN
KATHRYN G.W. COWDERY

TELEPHONE (904) 877-5629
TELECOPIER (904) 877-9631
E-MAIL bkcatlin@netally.com

March 3, 1997

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 961276-WS
Request for Variance from Order No. PSC 96-1190-FOF-WS in
Flagler County by Palm Coast Utility Corporation

Dear Ms. Bayo:

Enclosed for filing on behalf of Palm Coast Utility
Corporation in the above docket are an original and 15 copies of:

- 1) Motion for Reconsideration or, Alternatively, - 02276-97 3/3/97
Clarification;
- 2) Request for Oral Argument; and - 02277-97
- 3) Notice of Filing Transcripts of Agenda Conferences. - 02278-97

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.

Sincerely,

B. Kenneth Gatlin
B. Kenneth Gatlin

ACK _____
 AFA _____
 APP _____
 CAF _____
 CMU _____
 CTR _____
 EAG _____
 LEG _____
 LIN _____

BKG/pav
Enclosures

cc: w/encl. Donna Cyrus-Williams, Esq.

only the only

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Variance from Order)
No. PSC-96-1190-FOF-WS in Flagler County)
by Palm Coast Utility Corporation.)

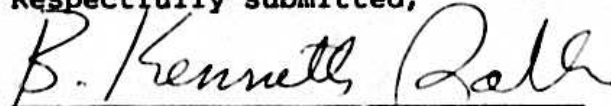
Docket No. 961276-WS

Filed: March 3^d, 1997**REQUEST FOR ORAL ARGUMENT**

Palm Coast Utility Corporation hereby requests that it be allowed to address the Commission on Palm Coast Utility Corporation's Motion for Reconsideration or, Alternatively, Clarification in the above docket, which is filed concurrently with this Request. The Motion raises important legal arguments stemming from a series of Commission actions in at least four different dockets. Oral argument would assist the Commission to evaluate the inter-relationship of those dockets and the substantive issue regarding grossup on prepaid CIAC, with counsel available to answer any questions the Commission may have.

DATED this 3^d day of March, 1997.

Respectfully submitted,



B. Kenneth Gatlin
Gatlin, Schiefelbein & Cowdery, P.A.
1709-D Mahan Drive
Tallahassee, Florida 32308
(904) 877-5609

Attorneys for
PALM COAST UTILITY CORPORATION

DOCUMENT NUMBER-DATE

02277 MAR-36

FPSC-RECORDS/REPORTING