

17  
4

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

In re: 1989 Hearings on Load Forecasts, )  
Generation Expansion Plans and )  
Cogeneration Prices for Peninsular )  
Florida )

Docket No. 90000 )  
Submitted for Filing:  
January 19, 1990

OPPOSITION TO REQUEST FOR ORAL ARGUMENT  
AND MOTION FOR RECONSIDERATION

Jacksonville Electric Authority (JEA) by and through its undersigned attorneys, files its objection to FICA's Request for Oral Argument and Motion for Reconsideration pursuant to Rule 25-22.058 and 25.22080.

As grounds in support of its opposition, JEA states:

ACK ✓  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG ✓  
LEG ✓  
LIN ✓  
DPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC ✓  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

1. JEA has been an interested party and participated in the hearing and consideration of the matter captioned above.
2. That FICA's Motion for Reconsideration of the Commission's Order No. 22341 simply restates factual material and legal arguments which were previously raised in the prehearing briefing, hearing, and posthearing briefs.
3. FICA's Motion for Reconsideration does not advance any factual materials not previously advanced or considered by the Commission prior to the entry of Order No. 22341.
4. The FCG has filed memoranda in opposition to FICA's Motion for Reconsideration and Request for Oral Argument.
5. JEA would adopt by reference the arguments set forth in the Memoranda filed by Hopping, Boyd, Green and Sams and would further urge the Commission to deny FICA's Request for Oral Argument and Motion for Reconsideration.

DOCUMENT NUMBER-DATE  
00649 JAN 22 1990  
FPSC-RECORDS/REPORTING

Respectfully submitted,

Edward C. Tannen  
James L. Harrison, General Counsel  
Edward C. Tannen, Assistant Counsel  
1300 City Hall  
220 East Bay Street  
Jacksonville, FL 32202  
(904) 630-1700  
Attorneys for the Jacksonville Electric  
Authority

**CERTIFICATE OF SERVICE**

I Hereby Certify that a copy of the foregoing has been furnished to the following persons by U. S. Mail this 19th day of January, 1990.

James A. McGee, Esquire  
Florida Power Corporation  
3201 24th Street South  
P. O. Box 14042  
St. Petersburg, FL 33733

Suzanne Brownless  
Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

Richard D. Melson, Esquire  
Hopping, Boyd, Green & Sams  
Suite 420  
First Florida Bank Building  
P. O. Box 6526  
Tallahassee, FL 32301

Lee Rampey, Esquire  
General Counsel  
Department of Energy  
Southeastern Power Adm.  
Elberton, GA 30635

James D. Beasley, Esquire  
Lee L. Willis, Esquire  
Ausley, McMullen, McGehee,  
Carothers & Proctor  
227 S. Calhoun Street  
P. O. Box 391  
Tallahassee, FL 32302

Susan Delegal, Esquire  
Broward County General Counsel  
115 South Andrews Avenue  
Suite 406  
Ft. Lauderdale, FL 33301

Matthew M. Childs, Esquire  
Charles Guyton, Esquire  
Steel, hector & Davis  
310 West College Avenue  
Tallahassee, FL 32301

Roy Young, Esquire  
Young, Van Assenderp, Varnadoe  
and Benton, P.A.  
225 South Adams Street  
Post Office Box 1833  
Tallahassee, FL 32302-1833

Joseph A. McGlothlin, Esquire  
Lawson, McWhirter, Grandoff  
& Reeves  
522 East Park Avenue  
Suite 200  
Tallahassee, FL 32301

Barney L. Capehart  
1601 N.W. 35th Way  
Gainesville, FL 32605

G. Edison Holland, Esquire  
Beggs and Lane  
P. O. Box 12950  
Pensacola, FL 32576

Yvonne Gsteiger  
Florida Rural Electric  
3915 Appalachee Parkway  
P. O. Box 590  
Tallahassee, FL 32302

Frederick M. Bryant, Esquire  
William J. Peebles, Esquire  
306 East College Avenue  
P. O. Box 1169  
Tallahassee, FL 32301

Jack Shreve  
Office of Public Counsel  
624 Fuller Warren Building  
202 Blount Street  
Tallahassee, FL 32301

Seminole Electric Cooperative  
P. O. Box 272000  
Tampa, FL 33688-2000

E. M. Grant  
Florida Keys Electric Coop.  
P. O. Box 377  
Tavernier, FL 33070

City of Chattahoochee  
Attn: Superintendent  
115 Lincoln Drive  
Chattahoochee, FL 32324

Gail Fels  
Assistant County Attorney  
Metro-Dade Center  
111 NW 1st Street, Suite 2810  
Miami, FL 33128-1993

John Blackburn  
P. O. Box 405  
Maitland, FL 32751

Ray Maxwell  
Reedy Creek Utilities Co.  
P. O. Box 40  
Lake Buena Vista, FL 32830

Quincy Municipal Electric  
Light Department  
P. O. Box 941  
Quincy, FL 32351

Alabama Electric Cooperative  
p. O. Box 550  
Andalusia, AL 37320

Terry O. Brackett  
Associate General Counsel  
Sunshine natural Gas System  
1899 L Street, N.W.  
Suite 500  
Washington, DC 20036

Guyte P. McCord, III, Esquire  
Macfarlane, Ferguson, Allison & Kelly  
215 South Monroe Street  
Post Office Box 82  
Tallahassee, FL 32302

C. M. Naeve, Esquire  
Shaheda Sultan, Esquire  
Skadden, Arps, Slate, Meagher & Flom  
1440 New York Avenue, NW

Mike Peacock  
Florida Public Utilities Co.  
P. O. Box 610  
Marianna, FL 32302

Ann Carlin, Esquire  
Gainesville Regional Utilities  
200 E. University Avenue  
Gainesville, FL 32602

Edward C. Tannen  
Edward C. Tannen