

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Territorial Dispute Between)
Okefenokee Rural Electric Membership)
Corporation and the Jacksonville)
Electric Authority of the City of)
Jacksonville, in Duval County.)

DOCKET NO. 911141-EU
Filed: May 15, 1992

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JEA'S REQUEST FOR ORAL ARGUMENT

The JACKSONVILLE ELECTRIC AUTHORITY ("JEA"), by and through its undersigned counsel, and pursuant to Rule 25-22.058, Florida Administrative Code, hereby requests the opportunity to present oral argument on its Motion to Dismiss, or in the Alternative, Motion to Strike Portion of OREMC's Petition to Resolve Territorial Dispute in Duval County. In support of its request for oral argument, JEA states as follows:

1. On May 15, 1992, JEA filed its Motion to Dismiss, or in the Alternative, Motion to Strike Portion of Okefenokee Rural Electric Membership Corporation's ("OREMC's") Petition to Resolve Territorial Dispute in Duval County. OREMC's Petition requests the Commission to enter an order requiring the parties to enter into a territorial agreement and/or determining and defining the territorial boundaries of the two utilities in Duval County, Florida. Pursuant to its Motion, JEA maintains that the Commission lacks the statutory authority to order the two utilities to enter into a territorial agreement and that territorial boundaries may not be determined since, apart from service to the Holiday Inn-Jacksonville Airport, there is no territorial dispute. The final hearing in this docket is presently scheduled for June 17, 1992.

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2. JEA's Motion raises important issues regarding the scope and extent of the Commission's jurisdiction to grant the relief requested by OREMC in its Petition. Oral argument will aid the Commission in its comprehension and evaluation of the issues raised by JEA's Motion. Further, oral argument will assist the Commission in gaining an understanding of the policy implications and precedents which may be established if the Commission determines that its final order in this matter will encompass and address the previously mentioned requests for relief by OREMC.

3. Accordingly, JEA respectfully request that the Commission grant its request for oral argument to be held at a regularly scheduled Agenda Conference or at some other time determined by the Commission prior to the final hearing.

Respectfully submitted,



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and

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing JEA's Request for Oral Argument was furnished by hand delivery this 15th day of May, 1992 to the following:

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