

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate increase in)
Flagler County by PALM COAST)
UTILITY CORPORATION)

Docket No. 951056-WS

ORIGINAL
FILED

**REQUEST FOR ORAL ARGUMENT ON
OBJECTIONS TO PUBLIC COUNSEL'S FIRST SET OF
INTERROGATORIES AND FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS AND MOTION FOR
TEMPORARY PROTECTIVE ORDER AND FOR PROTECTIVE ORDER**

Palm Coast Utility Corporation, hereby requests Oral Argument on Objections to Public Counsel's First Set of Interrogatories and First Set of Requests for Production of Documents and Motion for Temporary Protective Order and For Protective Order filed herewith. Oral argument may aid the Commission in comprehending the issues by having counsel present to answer the Commission's questions.

DATED this 1st day of May, 1996.

Respectfully submitted,

B. Kenneth Gatlin

B. Kenneth Gatlin
Fla. Bar #0027966
Gatlin, Woods & Carlson
1709-D Mahan Drive
Tallahassee, Florida 32308
(904) 877-7191

Attorneys for
Palm Coast Utility Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery to Mr. Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, 111 W. Madison Street, Room 812, Claude Pepper Building, Tallahassee, Florida 32399-1400, and to Mr. Ralph Jaeger, Esquire, Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, on this 1st day of May, 1996.

B. Kenneth Gatlin

B. Kenneth Gatlin

DOCUMENT NUMBER-DATE

04917 MAY-1996

FPSC-RECORDS/REPORTING

120

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100