

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and petition by Lee County )  
Electric Cooperative, Inc. for an investigation )  
of the rate structure of Seminole Electric )  
Cooperative, Inc. )  
\_\_\_\_\_ )

Docket No. 981827-EC

Filed: January 4, 1999

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SEMINOLE ELECTRIC COOPERATIVE, INC.'S  
REQUEST FOR ORAL ARGUMENT

Seminole Electric Cooperative, Inc. (Seminole), pursuant to Rule 25-22.058, Florida Administrative Code, hereby requests oral argument on its Motion to Dismiss filed simultaneously herewith. Seminole suggests that such oral argument be scheduled as part of the Commission's consideration of Seminole's motion at a regularly scheduled agenda conference.

As grounds for this request, Seminole states that LCEC's complaint and petition seeks to have the Commission abandon its long-standing application of Section 366.04(2)(b) and, for the first time in over twenty-four years since the statute was enacted, claim jurisdiction over Wholesale Power Contracts between Seminole and its Members. As discussed in the Motion to Dismiss, such a result would have far-reaching implications not only for Seminole, but for the regulation of all wholesale power transactions by cooperative and municipal utilities as well. Seminole believes that oral argument would assist the Commission in resolving this important matter.

RESPECTFULLY SUBMITTED this 4th day of January, 1999.

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ATTORNEYS FOR SEMINOLE  
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### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on the following by U.S. Mail this 4th day of January, 1999.

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