

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

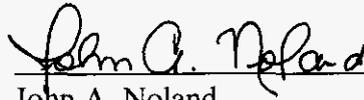
In re: Complaint and petition by Lee County)	
Electric Cooperative, Inc. for an investigation)	Docket No. 981827-EC
of the rate structure of Seminole Electric)	
Cooperative, Inc.)	Filed: January 19, 1999
_____)		

**RESPONSE OF LEE COUNTY ELECTRIC COOPERATIVE, INC.
OPPOSING REQUEST FOR ORAL ARGUMENT**

Pursuant to Rule 28-106.204(1), Florida Administrative Code, Lee County Electric Cooperative, Inc. ("LCEC") hereby responds in opposition to the Request for Oral Argument ("Request") filed by Seminole Electric Cooperative, Inc. ("Seminole"). LCEC submits that the application of the Commission's rate structure jurisdiction to Seminole's wholesale rates is not an issue of such complexity or consequence as to require oral argument to assist the Commission in its deliberations.

With its Request, Seminole seeks to inflate the issue of application of the Commission's rate structure jurisdiction beyond its true proportions. LCEC simply requests that the Commission exercise the clear and unambiguous statutory authority granted to it under Section 366.04(2)(b) to review Seminole's rate structure. There is no need for oral argument to clarify this authority. Moreover, as discussed in LCEC's Response to Seminole's Motion to Dismiss, granting LCEC's request need not have the "far-reaching" implications that Seminole suggests. In addition, granting Seminole's Request for oral argument will result in the unnecessary expenditure of Commission resources and wasteful delays in the review of LCEC's complaint and petition. The Commission should not succumb to Seminole's ploy to distract the Commission from the application of the plain language of Section 366.04(2)(b). For all of the foregoing reasons, LCEC respectfully requests that the Commission deny Seminole's Request.

RESPECTFULLY SUBMITTED this 18th day of January, 1999.



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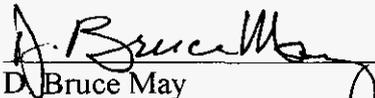
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CERTIFICATE OF SERVICE

I certify that a copy hereof has been furnished to Richard D. Melson, Esquire, P.O. Box 6526, Tallahassee, FL 32314; Robert A. Mora, Esquire, P.O. Box 2111, Tampa, FL 33601; and Timothy S. Woodbury, V.P., Corporate Planning, Seminole Electric Cooperative, Inc., P.O. Box 272000, Tampa, FL 33688-2000, by regular U.S. Mail this 19th day of January, 1999.



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