

ORIGINAL

CARLTON FIELDS  
ATTORNEYS AT LAW

ONE PROGRESS PLAZA  
200 CENTRAL AVENUE, SUITE 2300  
ST. PETERSBURG, FLORIDA 33701-4352

MAILING ADDRESS:  
P.O. BOX 2861, ST. PETERSBURG, FL 33731-2861  
TEL (727) 821-7000 FAX (727) 822-3768

October 2, 2000

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

VIA FEDERAL EXPRESS

In re: Petition for Determination of Need of Hines Unit 2 Power Plant  
Docket No: 00164-EI

Dear Ms. Bayo:

Florida Power Corporation ("FPC" or the "Company") is filing herewith an original and fifteen (15) copies of Florida Power Corporation's Motion to Strike Staff's Preliminary Issue Number 6 and The Direct Testimony of Billy R. Dickens and Florida Power Corporation's Request for Oral Argument.

We request you acknowledge receipt and filing of the above by stamping the additional copy of this letter and returning it to me in the self-addressed, stamped envelope provided.

If you or your Staff have any questions regarding this filing, please contact me at (727) 821-7000.

Very truly yours,

*Gary L. Sasso*  
Gary L. Sasso  
*js*

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP 1  
COM 5  
CTR \_\_\_\_\_  
EGR 3  
LRS 2  
LRO \_\_\_\_\_  
PAZ \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC \_\_\_\_\_  
SER 1  
OTH \_\_\_\_\_

Enclosure

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~12500~~ OCT-38

DOCUMENT NUMBER-DATE

~~12510~~ OCT-38

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination )  
of Need of Hines Unit 2 Power Plant. )  
 )  
\_\_\_\_\_ )

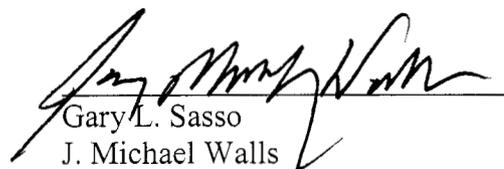
Docket No.: 001064-EI

Submitted for Filing: October 3, 2000

**FLORIDA POWER CORPORATION'S  
REQUEST FOR ORAL ARGUMENT**

Florida Power Corporation ("FPC" or the "Company"), through its undersigned attorneys and pursuant to Florida Rule of Civil Procedure 1.140(f) and Rules 28-106.204 and 25-22.058, F.A.C., requests oral argument on FPC's Motion to Strike Staff's Preliminary Issue Number 6 and the Direct Testimony of Billy R. Dickens before the Prehearing Officer at the Prehearing Conference in this proceeding on October 11, 2000 or, if need be, before the full panel of Commissioners at some later, mutually agreeable date and time. FPC believes that oral argument on its motion will assist the Prehearing Officer or Commissioners in understanding the nature of the policy and jurisdictional issues raised by Staff's proposed preliminary issue number 6 and the resulting grounds for FPC's objection to it in this need determination proceeding.

Respectfully submitted this 3<sup>RD</sup> of October, 2000.



Gary L. Sasso  
J. Michael Walls  
Jill H. Bowman  
**Carlton Fields**  
P. O. Box 2861  
St. Petersburg, Florida 33731-2861  
Telephone: (727) 821-7000  
Facsimile: (727) 822-3768

and

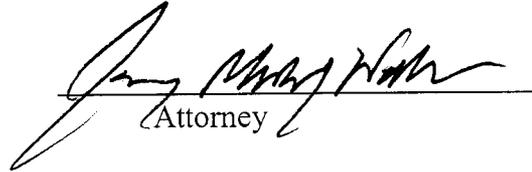
DOCUMENT NUMBER-DATE

~~12500~~ OCT-38

Robert A. Glenn  
Director, Regulatory Counsel Group  
**Florida Power Corporation**  
P.O. Box 2861  
St. Petersburg, FL 33731  
Telephone: (727) 820-5184  
Facsimile: (727) 820-5519

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT a true and correct copy of the foregoing has been furnished by facsimile and U.S. Mail to Deborah Hart, Esq., as counsel for the Public Service Commission, and by U.S. Mail to all other interested parties of record as listed below on this 2nd day of October, 2000.

  
Attorney

**PARTIES OF RECORD:**

Deborah Hart, Esq.  
Division of Legal Services  
Florida Public Service Commission  
Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Buck Oven  
Siting Coordination Office  
Department of Environmental Protection  
2600 Blairstone Road  
Tallahassee, FL 32301

Myron Rollins  
Black & Veatch  
P.O. Box 8405  
Kansas City, MO 64114

Paul Darst  
Strategic Planning  
Department of Community Affairs  
2740 Centerview Drive  
Tallahassee, FL 32399-2100