

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of City of Bartow, Florida,  
Regarding a Territorial Dispute with Tampa  
Electric Company, Polk County, Florida.

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DOCKET No. 011333-EU  
Filed: 011333-EU

**BARTOW'S REQUEST FOR ORAL  
ARGUMENT BEFORE THE FULL COMMISSION**

The City of Bartow, Florida ("Bartow"), by and through its undersigned attorneys, hereby requests an opportunity to present oral argument to the full Commission in opposition to Tampa Electric Company's ("TECO") Motion to Dismiss the petition to Bartow filed in this proceeding, and as grounds therefor says as follows:

1. Tampa Electric is this date filing a Response of Bartow to TECO's Motion to Dismiss.
2. Allowing oral argument on the response and the motion to dismiss will enable the parties and the Commission to focus on and have a better understanding of the legal standards governing petitions to modify territorial agreements.
3. Oral argument will also afford the Commission an opportunity to ask questions of the parties and address any issues necessary to a proper disposition of the motion to dismiss. Oral argument will serve as an aid to the Commission.

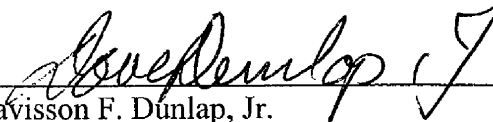
WHEREFORE, the City of Bartow respectfully requests that the Commission schedule oral argument on Tampa Electric Company's Motion to Dismiss and the City of Bartow's

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response thereto. The City of Bartow further requests that the motion to dismiss and the response thereto be considered by the full Commission.

  
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Attorneys for Petitioner, City of Bartow

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Response of Bartow to TECO's Motion to Dismiss has been furnished by United States mail on this 8/11 day of October, 2001, to:

Mr. Harry W. Long, Jr.  
Assistant General Counsel  
Tampa Electric Company  
Post Office Box 111  
Tampa, FL 33601

Mr. Lee L. Willis  
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Attorneys for Tampa Electric Company

  
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