

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Review of Florida Power Corporation's earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power & Light.

Docket No. 000824-EI

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COMMISSION
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In re: Review of Florida Power & Light Company's proposed merger with Entergy Corporation, the formation of a Florida transmission company ("Florida transco"), and their effect on FPL's retail rates.

Docket No. 001148-EI

In re: Review of Tampa Electric Company and the impact of its participation in GridFlorida, a Florida Transmission Company, on TECO's retail ratepayers.

Docket No. 010577-EI

Filed: January 4, 2002

JOINT REQUEST FOR ORAL ARGUMENT

Reliant Energy Power Generation, Inc., Mirant Americas Development, Inc., Duke Energy North America, and Calpine Corporation, pursuant to Rules 25-22.0376 and 25-22-058, Florida Administrative Code, hereby request oral argument on their contemporaneously filed Motion for Reconsideration of order No. PSC-01-2489-FOF-EI, issued December 20, 2001.

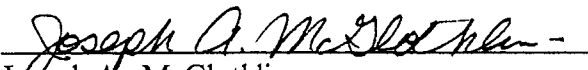
In the Joint Motion, Movants commend the Commission for having adopted a strong policy favoring the creation of an RTO, but ask the Commission to reconsider those aspects of the Order that mandate particular components of market design without first affording parties an opportunity to present evidence on the subjects. Oral argument would aid the Commission in comprehending

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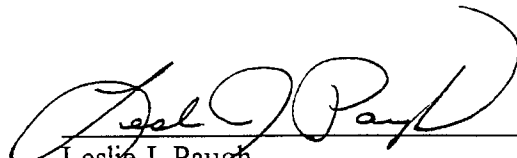
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and evaluating the very significant issues before it. The development of an effective RTO is crucial to the creation of a fully competitive wholesale market. The Joint Motion for Reconsideration necessarily can only illustrate in a limited manner the basis for Movants' contention that the Commission should not preclude testimony on these subjects in the new docket that will be opened to consider the revised RTO proposal. Oral argument will provide an opportunity for elaborating on the need to afford an opportunity to submit testimony on physical transmission rights and balanced schedules.


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CERTIFICATE OF SERVICE
DOCKETS 001148, 000824 AND 010577

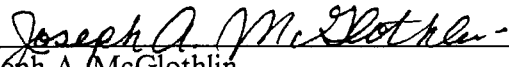
I HERBY CERTIFY that a true and correct copy of the Joint Motion for Oral Argument has been furnished by *Hand-delivery and U.S. Mail to the following parties on this 4th day of January, 2002.

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