

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Rate Increase )  
by Gulf Power Company )  
\_\_\_\_\_ )

Docket No.: 010949-EI  
Date: March 28, 2002

**REQUEST FOR ORAL ARGUMENT**

The Citizens of the State of Florida, through their attorney, the Public Counsel, pursuant to Rule 25-22.058, Florida Administrative Code, hereby request oral argument on the Citizens Response and Objection to Gulf Power Company's (Gulf) Exhibit 25. As grounds, the Citizens submit:

1. During the hearing in this docket, Gulf agreed to submit a late-filed exhibit in which the utility would formulate a plan for revenue or earnings sharing with its customers. In addition to the sharing plan, Gulf was also instructed to cite the specific testimony that the utility believed would support its proposed sharing plan.

2. Gulf submitted exhibit 25, which generally describes a plan to share income with Gulf's customers. Exhibit 25 also cites 26 areas of prefiled testimony which Gulf claims referenced the plan.

3. Until Gulf filed exhibit 25, the Citizens had not seen the proposal, and did not know which testimony would be cited as support. Upon examination of the exhibit, it is clear that the cited testimony does not support the proposal, and therefore the exhibit should be inadmissible.

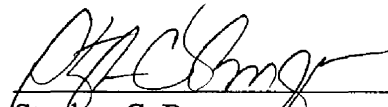
4. Because the cited testimony references are so numerous, however, oral argument would allow the parties a more appropriate opportunity to present their positions to the Commission.

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WHEREFORE, the Citizens respectfully request the Commission allow oral argument on the admissibility of Gulf's exhibit 25.

Respectfully submitted,

PUBLIC COUNSEL  
JACK SHREVE



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Deputy Public Counsel

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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 010949-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Oral Argument has been furnished by hand-delivery(\*) or U.S. Mail to the following parties on this 28th day of March, 2002.

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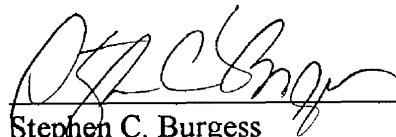
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