

Matilda Sanders

From: Dana Greene [DanaG@hgslaw.com]
 Sent: Monday, October 16, 2006 10:47 AM
 To: Filings@psc.state.fl.us
 Cc: Jennifer Brubaker; Katherine Fleming
 Subject: Docket 060635-EU

ORIGINAL

Attachments: Docket 060635 - Participants Request for Oral Argument on Motion to Strike.pdf

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Docket
 060635 - Participant
 Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 060635-EU

In re: Petition To Determine Need For an Electrical Power Plant in Taylor County

c. Document being filed on behalf of Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and City of Tallahassee

d. There are a total of 3 pages.

e. The document attached for electronic filing is the Request for Oral Argument on Motion to Strike for the parties listed above.

Thank you for your cooperation.

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DOCUMENT NUMBER-

09541 00

FPSC-COMMISSION

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Determine Need for
an Electrical Power Plant in Taylor
County by Florida Municipal Power
Agency, JEA, Reedy Creek
Improvement District and City of
Tallahassee

Docket No. 060635-EU

Dated: October 16, 2006

**REQUEST FOR ORAL ARGUMENT
ON MOTION TO STRIKE**

Florida Municipal Power Agency, JEA, Reedy Creek Improvement District, and City of Tallahassee ("Participants"), by and through their undersigned attorneys, pursuant to Rule 25-22.058, Florida Administrative Code ("F.A.C."), hereby request the opportunity to present oral argument to the full Commission on its motion for an order striking several of the issues raised in the Petition to Intervene by Rebecca J. Armstrong (the "Armstrong Petition"). In support, the Participants state:

1. By motion filed on this same date, the Participants moved the Commission for an order striking several of the issues raised in the Armstrong Petition. As explained in the Motion, several of the issues raised in the Armstrong Petition are outside the jurisdiction of this Commission. Furthermore, interjection of the new and unprecedented issues raised in the Armstrong Petition into an already technical and complex proceeding would have limited, if any, probative value in resolving the critical issues in this proceeding and would generate unnecessary discovery disputes and confusion over the issues in this proceeding.

2. The Participants believe that oral argument on the important matters raised in their Motion will assist the Commission in its deliberations by providing a more complete

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FPSC-COMMISSION CLERK

presentation of the matters at issue. Oral argument will also provide the Commission with the opportunity to request clarification of the arguments presented, as necessary.

WHEREFORE, the Participants respectfully request that the Commission schedule oral argument before the full Commission on their motion to strike certain of the issues raised in the Armstrong Petition in this proceeding.

Respectfully submitted this 16th day of October, 2006.

HOPPING GREEN & SAMS, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Request for Oral Argument on Motion to Strike in Docket No. 060635-EU was served upon the following by electronic mail(*) or U.S. Mail on this 16th day of October, 2006:

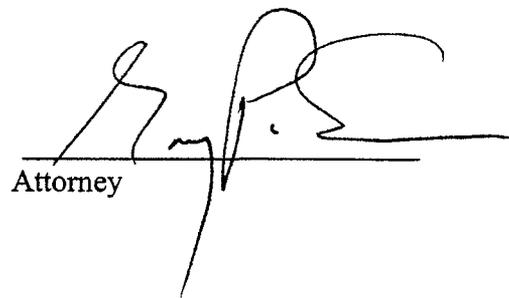
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