

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Determination of Need for electrical power plant in Taylor County by Florida Municipal Power Agency, JEA, Reedy Creek Improvement District, and the City of Tallahassee.

DOCKET No. 060635-EU FILED: December 27, 2006

REQUEST FOR ORAL ARGUMENT

Pursuant to Rule 25-22.058, Florida Administrative Code, the Natural Resources Defense Council requests that it be granted oral argument on its Response in Opposition to Motion to Strike. Oral argument will aid the Commission in evaluating the arguments presented and in reaching a fair and equitable resolution.

Respectfully submitted this 27th day of December, 2006 by:

/s/ Suzanne Brownless for
Patrice L. Simms, Esq.
Natural Resources Defense Council
1200 New York Avenue, N.W. Suite 400
Washington, DC 20005
Phone: (202) 289-2437
FAX: (202) 289-1060

Suzanne Brownless, Esq. Fla. Bar No. 309591 Suzanne Brownless, P.A. 1975 Buford Blvd. Tallahassee, FL 32308 Phone: (850) 877-5200 FAX: (850) 878-0090

Attorneys for NRDC

c: 5685

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided by electronic mail as listed and U.S. Mail, this 27th day of December, 2006 to the following:

Gary V. Perko, Esq.
Carolyn S. Raepple, Esq.
Hopping Law Firm
P.O. Box 6526
Tallahassee, FL 32314-6526
Gperko@hgslaw.com
Craepple@hgslaw.com

Brian P. Armstrong, Esq. 7025 Lake Basin Road Tallahassee, FL 32312 barmstrong@ngn-tally.com

E. Leon Jacobs, Esq.
Williams & Jacobs
1720 South Gadsden Street, MS 14, Suite 201
Tallahassee, FL 32302
ljacobs50@comcast.net

Jeanne Zokovitch Paben, Sr. Staff Attorney Brett M. Paben, Sr. Staff Attorney WildLaw 1415 Devils Dip Tallahassee, FL 32308-5140 jeanne@wildlaw.org

Valerie Hubbard, Director Department of Community Affairs Division of Community Planning 2555 Shumard Oak Blvd. Tallahassee, FL 32399-2100 Valerie.Hubbard@dca.state.fl.us Buck Oven
Michael P. Halpin
Department of Environmental Regulation
Siting Coordination Office
2600 Blairstone Road MS 48
Tallahassee, FL 32301

Harold A. McLean Office of the Public Counsel 111 West Madison Street, Room 812 Tallahassee, FL 32399 hallmc@earthlink.net Hamilton.Oven@dep.state.fl.us Michael.Halpin@dep.state.fl.us

Patrice L. Simms
Natural Resources Defense Council
1200 New York Ave., YW, Suite 400
Washington, DC 2005
psimms@nrdc.org

Jennifer Brubaker, Esq. Katherine Fleming, Esq. Legal Division Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

/s/Suzanne Brownless
Suzanne Brownless
Fla. Bar No. 309591

c:teccert