

Dorothy Menasco

From: DAVIS.PHYLLIS [DAVIS.PHYLLIS@leg.state.fl.us]
Sent: Monday, June 25, 2007 4:59 PM
To: Filings@psc.state.fl.us
Cc: CHRISTENSEN.PATTY; Jim Beasley; Lee Willis; Martha Brown; Myron Rollins; Paula K. Brown
Attachments: 050958 Oral Argument Request.doc; 050958 Motion for reconsideration.doc1.doc

ORIGINAL

Patricia A. Christensen, Associate Public Counsel
Office of Public Counsel
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1. This filing is to be made in Docket Number: 050958-EI, In re: Petition for approval of new environmental program for cost recovery through Environmental Cost Recovery Clause by Tampa Electric Company
2. Attached for filing on behalf of Office of Public Counsel is Office of Public Counsel's Motion for Reconsideration of Order No. PSC-07-0499-FOF-EI and Citizens' Request for Oral Argument.
3. There are a total of twenty (20) pages for filing

Phyllis W. Philip-Guide
Assistant to Patricia A. Christensen

b.

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FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for approval of new
environmental program for cost
recovery through Environmental Cost
Recovery Clause by Tampa Electric
Company

Docket No.: 050958-EI
Filed: June 25, 2007

CITIZENS' REQUEST FOR ORAL ARGUMENT

Pursuant to Rule 25-22.058, Florida Administrative Code, the Citizens of State of Florida, by and through undersigned counsel, request the opportunity to present oral argument on Citizens' Motion for Reconsideration of Order No. PSC-07-0499-FOF-EI (Order) which accompanies this request.

Oral argument will aid the Commission in comprehending and evaluating facts and policies which were overlooked or misstated in the Order. Specifically, oral argument will assist the Commission in understanding the following the mistakes of fact and law and the facts overlooked in rendering the Order: (a) the Order creates an environmental requirement were none exist; (b) the Order misconstrues representations made by TECO to the EPA; (c) the Order misinterprets the partial stipulation; and (d) the Order improperly ignores the function of the electric isolation project. Further, oral argument will assist the Commission with regard to proper application of the statutory standard set forth in Section 366.8255, Florida Statutes.

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Wherefore, Citizen request that this Request for Oral Argument be granted.

Respectfully Submitted,

s/Patricia A. Christensen
Associate Public Counsel

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Attorney for the Citizens of the State of
Florida

CERTIFICATE OF SERVICE

I, HEREBY CERTIFY that a true and correct copy of the foregoing Request for Oral Argument has been furnished by electronic mail and U.S. Mail on this 25th day of June, 2007, to the following:

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s/Patricia A. Christensen
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