BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition to determine need for Turkey Point Nuclear Units 6 and 7 electrical power plant, by Florida Power & Light Company.

Docket No. 070650-EI Filed: January 23, 2008

RECEIVED-FPSC 08 JAN 23 PM 4: 28 COMMISSION

REQUEST FOR ORAL ARGUMENT

JEA, pursuant to Rule 25-22.058, Florida Administrative Code, by and through its undersigned counsel, file this Request for Oral Argument and in support thereof state as follows:

- 1. On January 23, 2008 JEA filed its Motion for Reconsideration before the full Commission requesting that the limitations on its intervention and the striking of Issues 14, 16, 17-20 raised by JEA and other electric utilities be reversed.
- Due to the fact that this proceeding is the first time that the Commission will determine a need for a completely new nuclear power plant under modifications to both §403.519, Fla. Stat. (2007) and Rule 25-22.081, F.A..C., the full Commission would benefit from oral argument on the issues raised in the Motion for Reconsideration. These issues regarding the interpretation of §403.519(4)(a)5, Fla. Stat. (2007), and Rule 25-22.081(2)(d), F.A.C., are complex issues of first impression which will have substantial impacts on future nuclear power plant need determinations. Oral argument will aid the Commission in reaching a just and fair result.

WHEREFORE, JEA requests that this Commission allow oral argument on its Motion for Reconsideration at its earliest convenience.

Respectfully submitted this 23rd day of January, 2008 by:

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

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

Bruce Page, Esq.
Office of General Counsel
Fla. Bar No. 651389
City of Jacksonville
City Hall, St. James Building
117 West Duval Street, Suite 480
Jacksonville, Florida 32203

c: 6080

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided by U.S. Mail and electronic mail(*), this 23rd day of January, 2008 to the following:

Kenneth A. Hoffman, Esq. (*) Rutledge, Ecenia, Purnell & Hoffman, P.A 215 South Monroe Street, Suite 420 Tallahassee, Florida 32302-0551 ken@reuphlaw.com

Bill Feaster (*)
Regulatory Affairs
215 South Monroe Street, Suite 810
Tallahassee, Florida 32301-1859
Bill Feaster@fpl.com

William T. Miller, Esq. (*)
Miller, Balis & O'Neil, P.C.
1140 19th Street, N.W., Ste. 700
Washington, D.C. 20036
wmiller@mbolaw.com

Fredrick M. Bryant, Esq. (*)
Jody Lamar Finklea, Esq.
Daniel B. O'Hagan
Florida Municipal Power Agency
P.O. Box 3209
Tallahassee, Florida 32315-3209
Fred.bryant@fmpa.com
Jody.lamar.finklea@fmpa..com
Dan.ohagan@fmpa.com

Katherine E. Fleming, Esq. (*)
Jennifer Brubaker, Esq. (*)
Senior Attorney
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
keflemin@psc.state.fl.us
jbrubake@psc.state.fl.us

Charles J. Beck, Deputy Public Counsel(*)
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
Beck.charles@leg.state.fl.us

Florida Power & Light Company (*)
Stephen L. Huntoon
801 Pennsylvania Ave., N.W., Ste. 200
Washington, D.C. 20004
Stephen_huntoon@fpl.com

Vicki Gordon Kaufman, Esq. (*) Anchors Smith Grimsley 118 North Gadsden Street Tallahassee, Florida 32301 vkaufman@asglegal.com

Roger Fontes (*)
Florida Municipal Power Agency
8553 Commodity Circle
Orlando, Florida 32819
roger@fmpa.com

Bob and Jane Krasowski (*) 1086 Michigan Avenue Naples, Florida 34103-3857 minimushomines@aol.com

John T. Butler, Esq. (*)
Bryan S. Anderson, Esq.
Natalie Smith, Esq.
Jessica A. Cano, Esq.
Litchfield, Ross, Butler, etc.
700 Universe Blvd.
Juno Beach, Florida 33408
John Butler@fpl.com

Kenneth P.Ksionek, Esq. (*)
Zoila P. Easterling, Esq.
OUC
500 South Orange Ave.
Orlando, Florida 32801
kksionek@ouc.com
zeasterling@ouc.com

P.G. Para (*)
JEA
21 West Church Street
Jacksonville, Florida 32202
parapg@jea.com

Seminole Electric Cooperative, Inc. (*) Timothy S. Woodbury P.O. Box 272000 Tampa, Florida 33688-2000 tnovak@Seminole-Electric.com Roy C. Young, Esq. (*) Young, van Assenderp, P.A. 225 South Adams Street, Suite 200 Tallahassee, Florida 32301 ryoung@yvlaw.net

Bruce Page, Esq. (*)
Office of the General Counsel
City of Jacksonville
City Hall, St. James Building
117 West Duval Street, Suite 480
Jacksonville, Florida 32203
bpage@coj.net

Department of Environmental Protection Michael P. Halpin Siting Coordination Office 2600 Blair Stone Road, MS 48 Tallahassee, Florida 32301 Mike.Halpin@dep.state.fl.us

c: FPLcert

Suzanne Brownless Attorney for JEA