

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of Special Gas
Transportation Service Agreement with
Florida City Gas by Miami-Dade County
through Miami-Dade Water and Sewer
Department.

DOCKET NO. 090539-GU

DATED: March 16, 2011

**MIAMI-DADE COUNTY'S
REQUEST FOR ORAL ARGUMENT**

MIAMI-DADE COUNTY ("Miami-Dade") has concurrently filed a Motion To Strike Rebuttal Testimony of David A. Heintz, and pursuant to Rule 25-22.022, Florida Administrative Code, hereby requests the opportunity to present oral argument to the full Commission in support of Miami-Dade's Motion To Strike Rebuttal Testimony, and as grounds therefore, says:

1. On March 16, 2011, Miami-Dade moved to strike the rebuttal testimony of Florida City Gas Company witness David A. Heintz, and for such other relief as requested in that Motion, in the above-named docket.

2. Miami-Dade believes that oral argument on the matters raised in the above-named pleading will assist the Commission in its deliberations by providing a more complete presentation of the relevant facts and authorities as they bear on the matters at issue. Oral argument would also provide the Commission with the opportunity to request clarification, as necessary.

WHEREFORE, Miami-Dade respectfully requests that the Commission schedule oral argument before the full Commission on Miami-Dade's Motion to Strike Rebuttal Testimony.

Respectfully submitted,

R. A. CUEVAS, JR.
MIAMI-DADE COUNTY ATTORNEY

By: s/ Henry N. Gillman

Henry N. Gillman
Assistant County Attorney
Florida Bar No. 793647
Miami-Dade County
Stephen P. Clark Center
111 N.W. 1st Street, Suite 2810
Miami, Florida 33128
Telephone: 305-375-5151
Fax: 305-375-5611
Email: hgill@miamidade.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been furnished by electronic mail this 16th day of March, 2011 to the following:

Anna Williams, Esq.
Martha Brown, Esq.
Office of General Counsel
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Anwillia@PSC.State.FL.US
MBrown@PSC.State.FL.US
(Florida Public Service Commission)

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, FL 32308
Fself@lawfla.com
(Florida FCG)

Mr. Melvin Williams
933 East 25th Street
Hialeah, FL 33013
Mwilliam@aglresources.com
(Florida FCG)

Shannon O. Pierce, Esq.
Ten Peachtree Place, 15th floor
Atlanta, GA 30309
Spierce@aglresources.com
(AGL Resources, Inc.)

s/Henry N. Gillman
Henry N. Gillman

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of Special Gas Transportation Service Agreement with Florida City Gas by Miami-Dade County through Miami-Dade Water and Sewer Department.

DOCKET NO. 090539-GU

DATED: March 16, 2011

**MIAMI-DADE COUNTY'S
REQUEST FOR ORAL ARGUMENT**

MIAMI-DADE COUNTY ("Miami-Dade") has concurrently filed a Motion To Strike Rebuttal Testimony of David A. Heintz, and pursuant to Rule 25-22.022, Florida Administrative Code, hereby requests the opportunity to present oral argument to the full Commission in support of Miami-Dade's Motion To Strike Rebuttal Testimony, and as grounds therefore, says:

1. On March 16, 2011, Miami-Dade moved to strike the rebuttal testimony of Florida City Gas Company witness David A. Heintz, and for such other relief as requested in that Motion, in the above-named docket.

2. Miami-Dade believes that oral argument on the matters raised in the above-named pleading will assist the Commission in its deliberations by providing a more complete presentation of the relevant facts and authorities as they bear on the matters at issue. Oral argument would also provide the Commission with the opportunity to request clarification, as necessary.

WHEREFORE, Miami-Dade respectfully requests that the Commission schedule oral argument before the full Commission on Miami-Dade's Motion to Strike Rebuttal Testimony.

Respectfully submitted,

R. A. CUEVAS, JR.
MIAMI-DADE COUNTY ATTORNEY

By: s/ Henry N. Gillman

Henry N. Gillman
Assistant County Attorney
Florida Bar No. 793647
Miami-Dade County
Stephen P. Clark Center
111 N.W. 1st Street, Suite 2810
Miami, Florida 33128
Telephone: 305-375-5151
Fax: 305-375-5611
Email: hgill@miamidade.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been furnished by electronic mail this 16th day of March, 2011 to the following:

Anna Williams, Esq.
Martha Brown, Esq.
Office of General Counsel
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Anwillia@PSC.State.FL.US
MBrown@PSC.State.FL.US
(Florida Public Service Commission)

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, FL 32308
Fself@lawfla.com
(Florida FCG)

Mr. Melvin Williams
933 East 25th Street
Hialeah, FL 33013
Mwilliam@aglresources.com
(Florida FCG)

Shannon O. Pierce, Esq.
Ten Peachtree Place, 15th floor
Atlanta, GA 30309
Spierce@aglresources.com
(AGL Resources, Inc.)

s/Henry N. Gillman
Henry N. Gillman