

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates by Gulf  
Power Company.

Docket No. 110138-EI  
Dated: April 18, 2012

---

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Rule 25-22.0022, Florida Administrative Code, Gulf Power Company (“Gulf Power” or the “Company”) hereby requests oral argument on its Motion for Reconsideration which has been filed concurrently with this request. Oral argument will aid in the understanding and evaluation of the issues to be decided as follows:

1. Oral argument will allow counsel for Gulf Power to further discuss the factual grounds, applicable law and legal standards which necessitate reconsideration of the Commission’s decision to exclude all costs associated with Gulf Power’s North Escambia site from inclusion in the Company’s rate base as Property Held for Future Use. As more fully explained in Gulf’s Motion for Reconsideration, the Commission’s decision in this regard represents an unprecedented departure from Commission practice and will have implications far beyond the instant case.

2. Given the unprecedented nature of the Commission’s decision and the fact-intensive nature of the analysis which led to the Company’s decision to procure the North Escambia site, Gulf Power anticipates that the Commission will have questions. Oral argument will also allow counsel for Gulf Power to respond to questions from the Commission concerning the factual basis and legal grounds supporting the Company’s motion.

**WHEREFORE**, Gulf Power requests that oral argument be heard on its Motion for Reconsideration and that Gulf be granted 15 minutes for such oral argument.

DOCUMENT NUMBER DATE

02372 APR 18 2012

FPSC-COMMISSION CLERK

Respectfully submitted this 18th day of April, 2012.



---

**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

**STEVEN R. GRIFFIN**

Florida Bar No. 627569

**Beggs & Lane**

P. O. Box 12950

501 Commendencia Street

Pensacola, FL 32576-2950

(850) 432-2451

**CHARLES A. GUYTON**

Florida Bar No. 398039

**Gunster, Yoakley & Stewart, P.A.**

215 South Monroe Street, Suite 601

Tallahassee, FL 32312

(850) 521-1980

**RICHARD D. MELSON**

Florida Bar No. 201243

705 Piedmont Drive

Tallahassee, FL 32312

(850) 894-1351

**Attorneys for Gulf Power Company**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically and via U.S. Mail this 18th day of April, 2012 to all counsel of record as indicated below:

Caroline Klancke  
Keino Young  
Martha Barrera  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850  
mbarrera@psc.state.fl.us  
cklancke@psc.state.fl.us  
kyoung@psc.state.fl.us

Office of Public Counsel  
J. R. Kelly/Joseph A. McGlothlin/Erik Sayler  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32393-1400  
Kelly.jr@leg.state.fl.us  
mcglothlin.joseph@leg.state.fl.us  
Sayler.erik@leg.state.fl.us  
Merchant.tricia@leg.state.fl.us

Florida Industrial Power  
Users Group  
Vicki G. Kaufman/Jon C. Moyle, Jr.  
c/o Keefe Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301  
vkaufman@kagmlaw.com  
jmoyle@kagmlaw.com

Federal Executive Agencies  
c/o Major Christopher C. Thompson  
Ms. Karen White  
AFLOA/JACL-ULFSC  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base,  
Florida 32403  
chris.thompson.2@tyndall.af.mil  
karen.white@tyndall.af.mil

Robert Scheffel Wright/John T. La Via  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
schef@gbwlegal.com

BY: \_\_\_\_\_

