

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Fuel and purchased power cost recovery  
clause with generating performance incentive  
factor

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Docket No: 150001

Filed: July 7, 2015

**REQUEST FOR ORAL ARGUMENT ON OFFICE OF PUBLIC COUNSEL'S  
MOTION TO INCLUDE DISPUTED ISSUES OF MATERIAL FACT**

The Citizens of the State of Florida, through the Office of Public Counsel (Citizens or OPC), pursuant to Rule 25-22.0022, Florida Administrative Code, requests the Pre-Hearing Officer to allow oral arguments on OPC's Motion to Include Disputed Issues of Material Fact, and in support of this request, state:

1. On July 7, 2015, OPC filed its Motion to include Disputed Issues of Material Fact related to the Fuel Clause docket. Each proposed issue relates directly to the primary question of whether the Commission should continue to allow the Florida Investor Owned Utilities (IOUs) to hedge natural gas. Issues 1A and 1B pertain to the amount of hedging losses incurred from 2002 to 2015, while Issue 1C concerns the volatility of natural gas prices. The Commission's stated purpose for allowing the IOUs to hedge natural gas is to reduce fuel price volatility. OPC believes these issues are in dispute, and deserve Commission consideration as separate issues. Further, it would benefit the Pre-Hearing Officer to have oral argument to better evaluate and understand the disputed issues and hear from the parties regarding the merits of these issues.

2. OPC believes that ten minutes per party should be sufficient for oral argument.

WHEREFORE, the Office of Public Counsel, on behalf of the Citizens, respectfully requests this Commission allow oral argument on its Motion to Include Disputed Issues of Material Fact.

s/Patricia Christensen for  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Citizens' Motion to Include Disputed Issues of Material Fact has been furnished by electronic mail and/or U.S. Mail on this 7<sup>th</sup> day of July, 2015, to the following:

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