

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Florida Power & Light Company.

DOCKET NO. 160021-EI

In re: Petition for approval of 2016-2018 storm hardening plan, by Florida Power & Light Company.

DOCKET NO. 160061-EI

In re: 2016 depreciation and dismantlement study by Florida Power & Light Company.

DOCKET NO. 160062-EI

In re: Petition for limited proceeding to modify and continue incentive mechanism, by Florida Power & Light Company.

DOCKET NO. 160088-EI  
FILED: May 10, 2016

**CITIZENS' REQUEST FOR ORAL ARGUMENT ON THEIR MOTION FOR RECONSIDERATION OF ORDER NO. PSC16-0182-PCO-EI BEFORE THE FULL COMMISSION**

The Citizens of the State of Florida (Citizens), pursuant to Rules 25-22.0022 and 25-22.0376, Florida Administrative Code, hereby file Citizens' Request for Oral Argument on their Motion for Reconsideration of Order No. PSC 16-0182-PCO-EI (Consolidation Order), issued May 4, 2016, in the above dockets. Citizens seek oral argument and as grounds state the following:

1. On May 6, 2016, Citizens filed their Motion for Reconsideration of the Consolidation Order. Pursuant to Rule 25-22.0376 (5), Florida Administrative Code, Reconsideration of Non-Final Orders, Oral Argument on a Motion for Reconsideration filed pursuant to this Rule may be granted at the discretion of the Commission. Pursuant to Rule 25-22.0022, Oral Argument must be sought by separate written request filed concurrently with the motion on which argument is requested, or no later than 10 days after exceptions to a recommended order are filed. This request is being made concurrent

with the Motion on Reconsideration of Order No. PSC 16-0182-PCO-EI (Consolidation Order) within 10 days of the issuance of that Order.

2. Oral argument will assist the Commission in understanding and evaluating the mistakes of law and fact overlooked in rendering the Consolidation Order. Specifically, Oral Argument will assist the Commission understand why the bifurcation of the testimony filing dates established by the Consolidated Order will significantly adversely impact Intervenors' ability to adequately prepare meaningful testimony. Further, Oral Argument will assist the Commission in understanding the inextricable interrelationship of the Storm Hardening Plan and Incentive Mechanism issues with the other rate case issues and the significant complication of the work to present Intervenors' case and impossible diversion of resources and time in the preparation of the base rate case. Finally, Oral Argument will assist the Commission in understanding that the Parties had agreed to dates for the rate case proceeding and that the parties had come to reasonably rely on that schedule for logistics, discovery and general planning purposes on a unified testimony schedule for the single, consolidated hearing.
3. Citizens' believe that no more than 10 minutes per Party would be necessary to present Oral Argument.

WHEREFORE, the Citizens hereby request that the Commission grant their Request for Oral Argument on the Motion for Reconsideration of Order No. PSC 16-0182-PCO-EI (Consolidation Order).

Respectfully Submitted

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy if the foregoing has been furnished by electronic mail on this 10<sup>th</sup> day of May, 2016, to the following:

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