

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for rate increase by Gulf Power Company)	DOCKET NO. 160186-EI
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)	
In Re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization, by Gulf Power Company.)	DOCKET NO. 160170-EI
)	December 5, 2016
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CITIZENS' REQUEST FOR ORAL ARGUMENT ON THEIR MOTION TO COMPEL

The Citizens of the State of Florida (Citizens), pursuant to Rule 25-22.0022, Florida Administrative Code, hereby file Citizens' Request for Oral Argument on their Motion to Compel Production of Documents. Citizens seek oral argument and as grounds state the following:

1. 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 concurrently with the Motion to Compel.
2. Oral argument will assist the Commission in understanding the errors of law and fact promulgated by Gulf in its objections to the Citizens' Request for Production of Documents. The subject matter is complex and sufficiently important to the Citizens' case to merit Oral Argument. Specifically, Oral Argument will help the Commission understand the manner in which Gulf's finances and business functions are dependent on, and intertwined with, those

of its parent and subsidiary companies. The sophisticated web of interrelation regarding Gulf's corporate functions and finances is very complex. As such, Oral Argument is necessary for the Citizens to fully outline the inextricable interrelationship of Gulf to its parent and numerous subsidiaries. This explanation in turn, is necessary to show why the Citizens need the documents requested in order to thoroughly investigate the claims raised by Gulf in its petition and testimony regarding its financial integrity, as relates to the requested rate increase. Oral Argument is necessary for Citizens to fulfill its duties in representing the ratepayers of Florida in this proceeding.

3. Citizens believe that 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 to Compel Production of Documents.

Respectfully Submitted

J.R. KELLY
PUBLIC COUNSEL



Stephanie A. Morse
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330

Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Citizens' Request for Oral Argument on Their Motion to Compel has been furnished by electronic mail to the following parties on this 5th day of December, 2016:

Bianca Lherisson
blheriss@psc.state.fl.us
Kelley Corbari
kcorbari@psc.state.fl.us
Stephanie Cuello
scuello@psc.state.fl.us
Theresa Tan
ltan@psc.state.fl.us
Florida Public Service Commission
2540 Shumard Oak Blvd., Room 110
Tallahassee, FL 32399-0850

Thomas A. Jernigan
Thomas.Jernigan.3@us.af.mil
Federal Executive Agencies
AFCEC/JA-LFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403

Jeffrey A. Stone, Esquire
jas@beggslane.com
Russell A. Badders, Esquire
rab@beggslane.com
Steven R. Griffin, Esquire
srg@beggslane.com
Beggs & Lane
P. O. Box 12950
Pensacola, FL 32576-2950

Mr. Robert L. McGee, Jr.
rlmcgee@southernco.com
Gulf Power Company
One Energy Place
Pensacola FL32520-0780



Stephanie A. Morse
Associate Public Counsel
Florida Bar No. 0068713