

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to resolve territorial dispute in)
Sumter County and/or Lake County with)
City of Leesburg and/or South Sumter Gas)
Company, LLC, by Peoples Gas System.)
_____)

Docket No. 20180055-GU

Submitted for filing:
4-9-2018

**PEOPLES GAS SYSTEM'S RESPONSE TO
SOUTH SUMTER GAS COMPANY, LLC'S REQUEST FOR ORAL ARGUMENT**

Peoples Gas System ("Peoples"), by its undersigned counsel, and hereby responds to South Sumter Gas Company, LLC's ("SSGC") Request for Oral Argument and states:

1. *Rule 25-22.0022, F.A.C.* provides, among other things that a request for oral argument shall state with particularity why oral argument would aid the Commissioners or the pre-hearing officer in an understanding and evaluating the issues to be decided. The issue in this case is whether Peoples' Petition sufficiently states a cause of action to withstand the motion to dismiss that has been filed by SSGC.


2. SSGC's Request for Oral Argument does not state with particularity or otherwise why oral argument would aid the Commissioners in understanding its Motion to Dismiss.

3. Peoples submits that the issues raised in SSGC's Motion to Dismiss have been adequately argued in the Motion and in Peoples' Response to the Motion and that oral argument, particularly on the topics suggested in SSGC's Request, would not further aid the Commission in ruling on the Motion.

4. Should the Commission decide that it wants to hear oral arguments, Peoples would ask that it be given an amount of time equal to whatever amount of time is granted to both opposing parties in this matter. In other words, if SSGC and the City of Leesburg are each given 10 minutes for argument, Peoples would request 20 minutes in order to adequately respond to all of the arguments made.

WHEREFORE, Peoples asks that the Commission deny the request for oral argument or in the alternative, grant Peoples an amount of time equal to the combined total of time granted to Leesburg and SSGC.

Respectfully submitted,

A handwritten signature in blue ink, reading "Andrew M. Brown", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Reply has been furnished (except as otherwise noted below) by electronic mail to the following, this 9th day of April, 2018:

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