

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

IN RE: Petition of Monsanto )  
Company for a declaratory )  
statement concerning the )  
provision of electric power to )  
facilities at its Pensacola )  
Chemical Complex. )

Docket No. 920198-EQ  
Filed: April 14, 1992

REQUEST OF MONSANTO COMPANY FOR ORAL ARGUMENT

Monsanto Company (Monsanto), by and through its undersigned attorneys, requests that it be granted oral argument on its Response in Opposition to Gulf Power Company's Petition for Hearing and Response in Opposition to Gulf Power Company's Petition for Leave to Intervene filed on this date and in support thereof states:

1. Due to the fact that the allowance of intervention by Gulf Power Company in this proceeding will directly and significantly affect the course of Commission action both procedurally and substantively, oral argument will aid the Commission in comprehending and evaluating this issue.

2. Granting oral argument will follow precedent established in Order No. 16581, issued on September 11, 1986, in which oral argument was granted by Prehearing Officer Katie Nichols regarding requests for intervention and evidentiary hearing by Gulf in a similar declaratory statement docket.<sup>1</sup>

<sup>1</sup> Docket No. 860725-EU, In re: Petition of Monsanto Company for a declaratory statement concerning the lease financing of a cogeneration facility.

DOCUMENT NUMBER-DATE  
03703 APR 14 1992  
FPSC-RECORDS/REPORTING

3. Monsanto would suggest that if this request for oral argument is granted that it be conducted at the Commission's May 5, 1992 regular agenda. This is the procedure which was followed in Docket No. 860725-EU referenced above and would appear to be appropriate here.

WHEREFORE, Monsanto Company respectfully requests that it be granted oral argument on its Responses in Opposition to Gulf Power Company's Petition for Leave to Intervene and request for hearing.

Respectfully submitted this 14th day of April, 1992, by:



---

Richard A. Zambo, Esquire  
Richard A. Zambo, P.A.  
598 S.W. Hidden River Avenue  
Palm City, Florida 34990

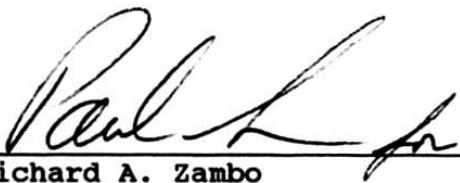
Attorneys for Monsanto Company

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided to the following persons by U.S. Mail or Hand-delivery (\*), this 14th day of April, 1992.

\*Richard Bellak  
Associate General Counsel  
Division of Appeals  
Florida Public Service  
Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0850

G. Edison Holland, Esquire  
Jeffrey A. Stone, Esquire  
Beggs and Lane  
3 West Garden Street  
Post Office Box 12950  
Pensacola, Florida 32576-2950

  
Richard A. Zambo