**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: Petition of Monsanto ) Docket No. 920198-EQ

Company for a declaratory ) Filed: April 14, 1992

statement concerning the )

provision of electric power to)

facilities at its Pensacola )

Chemical Complex. )

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**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.[[1]](#footnote-1)

**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:

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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

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Richard A. Zambo

1. Docket No. 860725-EU, In re: Petition of Monsanto Company for a declaratory statement concerning the lease financing of a cogeneration facility. [↑](#footnote-ref-1)