BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



In Re: Petition to resolve)
territorial dispute with Gulf)
Coast Electrical Cooperative, Inc.)
by Gulf Power Company)

Docket No. 930885-EU

GULF POWER COMPANY'S REQUEST FOR ORAL ARGUMENT

GULF POWER COMPANY ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned counsel, and pursuant to Rule 25-22.058 of the Florida Administrative Code, hereby requests that the Florida Public Service Commission ("Commission") allow the Company to be heard in oral argument on its Response to Gulf Coast Electric Cooperative's Motion to Strike Rebuttal Testimony of Russell L. Klepper, which is filed concurrently herewith. In support of its request, Gulf states:

- 1. Gulf Coast's Motion, and Gulf Power's Response, present significant substantive and procedural issues regarding the scope of Issue No. 1 in this docket, Gulf Power's position on that issue, and the effect and meaning of Commission Order PSC-94-1191-PCO-EU, issued September 29, 1994.
- 2. As stated in Gulf Power's Response, the Commission's determination of these issues will directly impact the Company's ability to adequately argue its position on Issue No. 1 at the hearings in this docket. Allowing the Company to present oral argument in support of its Motion would assist the Commission in evaluating this critical issue. Further, permitting oral argument will allow the Commission to directly question the Company concerning the merits of the Motion, Gulf Power's Response, and the

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effect of the Commission's decision in Order No. PSC-94-1191-PCO-EU.

WHEREFORE, Gulf Power Company respectfully requests that it be heard in oral argument in support of its Response to Gulf Coast Electrical Cooperative's Motion to Strike Rebuttal Testimony of Russell L. Klepper.

Respectfully submitted this the day of October, 1994.

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