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October 10, 1997

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VIA HAND DELIVERY

Ms. Blanca Bayó
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

In re: Docket No. 971313-EP

Dear Ms. Bayó:

Enclosed are the original and 15 copies of IMC-Agrico's Request To Address the Commission in the above docket.

I have enclosed an extra copy of the Request To Address the Commission for you to stamp and return to me. Please contact me if you have any questions. Thank you for your assistance.

Yours truly,

Joe McGlothlin
Joseph A. McGlothlin

ACK _____
AFA _____
APP _____
CAP JAM/rls _____
CUB Enclosures _____
CTR _____
EAS 2 _____
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[Signature]
FPSC - BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10767 OCT 20 97

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of IMC-Agrico Company) Docket No. 971313-EI
for a Declaratory Statement Confirming)
Non-Jurisdictional Nature of Planned)
Self-Generation.) Filed: October 20, 1997
_____)

REQUEST TO ADDRESS THE COMMISSION

IMC-Agrico Corporation ("IMCA"), by its undersigned counsel, requests permission to orally address the Commission at the time it takes up IMCA's Petition for Declaratory Statement for decision, and in support states:

1. This docket was initiated by a Petition for Declaratory Statement in which IMCA asks the Commission to confirm that, under the facts presented in the Petition, the proposed transaction would not fall within the Commission's regulatory jurisdiction and no participant would be deemed to be a "public utility" within the meaning of Section 366.02, Florida Statutes.

2. IMCA believes the Commission's consideration of the rather complex ownership arrangements and business structure proposed by IMCA would be facilitated if IMCA were allowed to orally describe its proposal, explain why IMCA believes it is entitled to the requested declaration, and answer any questions at the time the matter is presented to the Commission for decision.


3. The Commission has discretion to grant this request under Rule 25-22.022 (3), Florida Administrative Code.


DOCUMENT NUMBER-DATE

10767 OCT 20 97

FPSC-RECORDS/REPORTING

WHEREFORE, IMCA respectfully requests permission to orally address the Commission regarding its Petition.


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