



STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

RECEIVED

OCT 30 1997

FPSC Records/Reporting

October 30, 1997

Ms. Blanca S. Bayó, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0870

> RE: Docket No. 970171-EU

Dear Ms Bayo:

Enclosed are an original and fifteen copies each of a Joint Motion for Reconsideration and Request for Oral Argument for filing in the above referenced docket

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

ACK	
AFA	3
APP	
CAF	
CMU	. 110 E - 120 - 140
CIR	→ SCB/dsb
EAG	SCB/dsb Enclosures
LFG	_1
LIN	5_
$C \cap \mathbb{C}$	
RCH,	REGERVED & FILED
Sil	AEGENES & FILES
WAS	0
OTH	FOR THERE'S OF RECORDS

Sincerely,

Stephen C. Burgess Deputy Public Counsel

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of appropriate)	Docket No. 970171-EU Filed October 30, 1997
cost allocation and regulatory)	
treatment of total revenues associated		
with wholesale sales to Florida)	
Municipal Power Agency and City of)	
Lakeland by Tampa Electric Company.)	
100 E)	

REQUEST FOR ORAL ARGUMENT

The Citizens of the State of Florida, through the Office of Public Counsel, and Florida Industrial Power Users Group ("FIPUG"), through its undersigned counsel, pursuant to Rules 25-22.058 and 25-22.060(1)(f). Florida Administrative Code, request the opportunity to present oral argument on their motion for reconsideration filed this same date. Order No PSC-97-1273-FOF-EU, the subject of the motion for reconsideration, allows stipulations affecting base rates to be the basis for allowing Tampa Electric Company to report wholesale fuel cost at less than system average in the fuel cost recovery docket and to use certain wholesale fuel cost shortfalls to lessen the potential for retail base rate refunds. These complicated interactions between the base rate stipulations and the fuel cost recovery proceeding could best be clarified through oral presentations.

Respectfully submitted,

JACK SHREVE Public Counsel

Stephen C. Burgess
Deputy Public Counsel

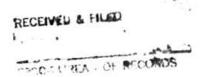
Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

(850) 488-9330

DOCUMENT NUMBER - DATE

11204 OCT 30 5

FPSC-RECORDS/REPORTING



Attorneys for the Citizens of the State of Florida

AND

John W. McWhirter, Esquire Vicki Gordon Kaufman, Esquire McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A 117 South Gadsden Street Tallahassee, Florida 32301

Attorneys for the Florida Industrial Power Users Group

CERTIFICATE OF SERVICE DOCKET NO. 970171-EU

I HEREBY CERTIFY that a true and correct copy of Citizens' Request for Oral Argument

has been sent by *Hand-delivery or U.S. Mail this 30th day of October, 1997 to the following

Gary Lawrence, Esquire 501 East Lemon Street Lakeland, Florida 33801-5079

Robert Williams, Esquire 7201 Lake Ellionor Drive Orlando, Florida 32809

James A. McGee, Esquire Florida Power Corporation Post Office Box 14042 St. Petersburg, Florida 33733-4042

Lee L. Willis, Esquire James D. Beasley, Esquire Ausley & McMullen 227 South Calhoun Street Post Office Box 391 Tallahassee, Florida 32302 *Leslie Paugh, Esquire Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Angela Llewellyn, Esquire Regulatory and Business Strategy Post Office Box 111 Tampa, Florida 33601-0111

G. Edison Holland, Esquire Jeffrey A. Stone, Esquire Beggs & Lane Post Office Box 12950 Pensacola, Florida 32576

Stephen C. Burgess Deputy Public Counsel