AUSLEY & MCMULLEN

ORIGINAL

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET P.O. BOX 391 (ZIP 32302) TALLAHASSEE, FLORIDA 32301 (850) 224-9115 FAX (850) 222-7560

November 12, 1997

HAND DELIVERED

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Re: Determination of appropriate 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; FPSC Docket No. 970171-EU

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of each of the following:

- 1. Tampa Electric Company's Response to Motion for Reconsideration filed on Behalf of Office of Public Counsel and the Florida Industrial Power Users Group.
- Tampa Electric Company's Conditional Request for Oral Argument.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter. ACK -AFA 2 Sincerely, APT: James D. Beasley CAI ----C1.111 -----JDB/pp Enclosures Scc: All Parties of Record (w/encls.) NOLION DOCUMENT NUMBER-DATE NI MRER -DATE PA 11 11607 NOV 125 11608 NOV 125 still. FPSC-RECORDS/REPORTING WAS -----FPSC-RECERTIS/REPORTING NTH ____

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of appropriate 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.

DOCKET NO. 970171-EU FILED: November 12, 1997

TAMPA ELECTRIC COMPANY'S CONDITIONAL REQUEST FOR ORAL ARGUMENT

Office of Public Counsel ("OPC") and the Florida Industrial Power Users Group ("FIPUG") have requested oral argument on their Joint Motion for Reconsideration in this proceeding. As explained in Tampa Electric's response to the Joint Motion, OPC and FIPUG are simply attempting to reargue matters fully considered and decided by the Commission. Consequently, Tampa Electric does not believe oral argument is necessary. Instead, OPC's and FIPUG's Joint Motion should be summarily denied. However, if the Commission elects to schedule oral argument, Tampa Electric requests the opportunity to participate.

DATED this 12 Dday of November, 1997.

Respectfully submitted,

LEE L. WILLIS JAMES D. BEASLEY KENNETH R. HART Ausley & McMullen Post Office Box 391 Tallahassee, Florida 32302 (850) 224-9115

HARRY W. LONG, JR. TECO Energy, Inc. Post Office Box 111 Tampa, Florida 33601-0111

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Conditional Response for Oral Argument, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand deliver (*) on this /2²⁴ day of November, 1997 to the following:

Ms. Leslie Paugh* Staff Counsel Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Mr. Gary Lawrence City of Lakeland 501 East Lemon Street Lakeland, FL 33801-5079

Ms. Vicki Gordon Kaufman WcWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 South Gadsden Street Tallahassee, FL 32301 Mr. John W. McWhirter McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas Post Office Box 3350 Tampa, FL 33601

Mr. Robert Williams FMPA 7201 Lake Ellinor Drive Orlando, FL 32809

Mr. John Roger Howe Office of Public Counsel c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400

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