# ORIGINAL

## McWhirter Reeves

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PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

May 30, 2003

#### VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re: Docket No.: 020898-EQ

Dear Ms. Bayo:

On behalf of Cargill Fertilizer, Inc. enclosed for filing and distribution are the original and 15 copies of the following:

- Cargill Fertilizer, Inc.'s Motion to Convene Mediation, Lift the Procedural Abatement, Compel Tampa Electric Company to Respond to Outstanding Discovery, and Establish Procedural Schedule; and,
- Cargill Fertilizer, Inc.'s Request for Oral Argument.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copy to me. Thank you for your assistance.

Sincerely,

Okli Godow Laufman Vicki Gordon Kaufman

AUS CAF CMP CWH CTR VGK/bae ECR — Enclosures GOL OPC MMS SEC

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Cargill Fertilizer, Inc. For permanent approval of self-service Wheeling to, from, and between points Within Tampa Electric's service area.

Docket No. 020898-EO

May 30, 2003 Filed:

### CARGILL FERTILIZER, INC.'S REQUEST FOR ORAL ARGUMENT

Cargill Fertilizer, Inc. (Cargill), pursuant to rule 25-22.058, Florida Administrative Code, requests Oral Argument on its Motion to Compel filed simultaneously herewith. This case concerns the continuation of Cargill's self-service wheeling program and the continued fuel and conservation benefits that flow from it. Critical information used to calculate such benefits is in TECo's sole possession. Oral argument on this Motion will assist the Commission in evaluating and understanding the critical nature of this information to Cargill's due process right to adequately prepare its case.

WHEREFORE, Cargill requests that it be granted Oral Argument on its Motion to Compel.

John W. McWhirter, Jr.

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Attorneys for Cargill Fertilizer, Inc.

DOCUMENT NUMBER - DATE

#### **CERTIFICATE OF SERVICE**

I HERBY CERTIFY that a true and correct copy of the foregoing Cargill Fertilizer, Inc.'s Request for Oral Argument has been furnished by (\*) hand delivery or U.S. Mail this 30th day of May, 2003 to the following:

- (\*) Rosanne Gervasi Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399
- (\*) Michael Haff Florida Public Service Commission 2540 Shumard Oak Blvd Gunter Building ECR, Room 225L Tallahassee, Florida 32399
- (\*) James D. Beasley Ausley & McMullen 227 South Calhoun Street Post Office Box 391 Tallahassee, Florida 32302

Harry W. Long, Jr. Tampa Electric Company Post Office Box 111 Tampa, Florida 33601

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