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COMMISSION
CLERK

April 22, 2011

Via Hand-Delivery

Ms. Ann Cole
Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 090539-GU
In re: Petition for Approval of Special Gas Transportation Service Agreement
with Florida City Gas by Miami-Dade County through Miami-Dade Water and
Sewer Department

Dear Ms. Cole:

Enclosed please find for filing in the above referenced docket an original and seven
copies of MIAMI-DADE COUNTY'S MOTION IN LIMINE TO EXCLUDE INTRODUCTION
OF REVISED OR SUPPLEMENTAL EVIDENCE OF FLORIDA CITY GAS WITNESSES,
CREATED AFTER THE FILING OF PREFILED TESTIMONY, AND REQUEST FOR
EXPEDITED RELIEF and REQUEST FOR ORAL ARGUMENT.

Thank you for your assistance with this filing. If you have any questions, please do not
hesitate to contact me.

Sincerely,

Henry N. Gillman
Assistant County Attorney

- COM _____
- APA _____
- ECR 10
- GCL _____
- RAD _____
- SSC _____
- ADM _____
- OPC _____
- CLK _____

cc: All Parties of Record

DOCUMENT NUMBER-DATE
02802 APR 22 =
FPSC-COMMISSION CLERK

In re: Petition for Approval of Special Gas Transportation Service Agreement with Florida City Gas by Miami-Dade County through Miami-Dade Water and Sewer Department.

DOCKET NO. 090539-GU COMMISSION CLERK

Date: April 22, 2011

**MIAMI-DADE COUNTY'S
REQUEST FOR ORAL ARGUMENT**

MIAMI-DADE COUNTY ("Miami-Dade") has concurrently filed a Motion in Limine to Exclude Introduction of Revised or Supplemental Evidence of Florida City Gas Witnesses, Created After the Filing of Prefiled Testimony, and Request for Expedited Relief, and pursuant to Rule 25-22.022, Florida Administrative Code, hereby requests the opportunity to present oral argument to the Commission's Prehearing Officer, and as grounds therefore, says:

1. On April 22, 2011, Miami-Dade moved for an order granting the above-referenced relief based upon FCG's unprecedented intent to rely solely upon the results of party discovery efforts to present FCG's case-in-chief. The results of the Miami-Dade and Commission Staff discovery in no way supports or corroborates FCG's assertions in FCG's pre-filed testimony, but rather such discovery establishes that FCG's assertions in its pre-filed testimony are neither valid nor credible.

2. Miami-Dade believes that oral argument on the matters raised in the above-named pleading will assist the Prehearing Officer in its deliberations by providing a more complete presentation of the relevant facts and authorities as they bear on the matters at issue. Oral argument would also provide the Prehearing Officer with the opportunity to request clarification, as necessary.

DOCUMENT NUMBER-DATE

02802 APR 22 =

FPSC-COMMISSION CLERK

WHEREFORE, Miami-Dade respectfully requests that the Commission schedule oral argument before the Prehearing Officer on Miami-Dade's Motion in Limine to Exclude Introduction of Revised or Supplemental Evidence of Florida City Gas Witnesses, Created After the Filing of Prefiled Testimony, and Request for Expedited Relief.

Respectfully submitted,

R. A. CUEVAS, JR.
MIAMI-DADE COUNTY ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand-delivery or U.S. Mail this 22nd day of April, 2011 to the following:

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s/Henry N. Gillman
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