

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Analysis of Utilities, Inc.'s financial / Docket No: 120161-WS
accounting and customer service computer system. /
_____/ Filed: March 4, 2014

**REQUEST FOR ORAL ARGUMENT ON OFFICE OF PUBLIC COUNSEL'S
MOTION TO COMPEL DISCOVERY RESPONSES**

The Citizens of the State of Florida, through the Office of Public Counsel (Citizens or OPC), pursuant to Rule 25-22.0022, Florida Administrative Code, requests the Pre-Hearing Commissioner or Commission to allow oral arguments on OPC's First Motion to Compel Discovery Responses, and in support of this request, states:

1. On March 4, 2014, OPC filed its Motion to Compel Discovery Responses related to OPC's Project Phoenix issues. Each discovery request relates to subissues encompassed within the remaining broadly drafted issue to be resolved: "Should any adjustment be made to the Utility's Project Phoenix Financial/Customer Care Billing System (Phoenix Project)?" OPC believes it would benefit the Pre-Hearing Officer or the Commission to have the ability to question the parties about the merits of its Motion and evaluate the subissues related to Project Phoenix to be decided in this case, and if the Commission grants OPC's Motion, what possible effect that would have on the current hearing schedule.
2. OPC believes that five (5) minutes per party should be sufficient for oral argument.

WHEREFORE, the Office of Public Counsel, on behalf of the Citizens, respectfully requests this Commission to allow oral argument on its Motion to Compel Discovery Responses.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Office of Public Counsel **Request for Oral Argument on OPC's Motion to Compel Discovery Responses** has been furnished by electronic mail and/or U.S. Mail to the following parties on this 4th day of March, 2014, to the following:

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