

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for review and determination on )  
the project construction and gas )  
transportation agreement between NUI ) DOCKET NO. 160175-GU  
Utilities, Inc. d/b/a City Gas Company )  
of Florida and Florida Crystals ) FILED: September 19, 2016  
Corporation, and approval of an )  
interim service arrangement. )  
\_\_\_\_\_)

**FLORIDA CRYSTALS CORPORATION'S**  
**REQUEST FOR ORAL ARGUMENT**

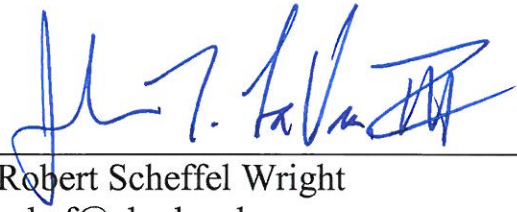
Florida Crystals Corporation (“Florida Crystals”), pursuant to Rule 25-22.058, Florida Administrative Code (“F.A.C.”), and subject to its pending unopposed motion to be designated a party or, in the alternative to intervene, in this proceeding filed herein on August 5, 2016, hereby requests that the Commission allow oral argument on the Response in Opposition to Motion for Approval of a Temporary Interim Service Arrangement filed by Florida Crystals contemporaneously with this Request. Florida Crystals believes that oral argument will aid the Commission in fully comprehending several complex issues raised by Florida Crystals’ Response in Opposition to Florida City Gas’s (“FCG”) Motion for Approval of a Temporary Interim Service Arrangement. Those complex issues involve whether FCG has met its burden of establishing entitlement to interim rate relief; consideration of the cost of service allegations made by FCG, which Florida Crystals contests; the unique procedural history of the agreement between FCG

and Florida Crystals, which the parties have performed for more than fifteen years; and the substantive economic facts which were presented to the Commission in a 2003 general rate case for FCG, upon which the Commission relied in setting FCG's rates at that time. Other issues regarding which oral argument would be helpful to the Commission include the relationship between the Commission's jurisdiction and the Florida courts' jurisdiction with respect to contract disputes, where one party is a regulated utility; the effect of, and proper remedies for, FCG's self-confessed violation of its tariff; and other issues.

WHEREFORE, Florida Crystals Corporation respectfully requests that the Commission grant oral argument on its Response to FCG's Motion for Approval of Temporary Interim Service Arrangement filed contemporaneously herewith.

Because of the number of grounds raised for denial in Florida Crystals' Response and the unique history of FCG's conduct and the Commission's knowledge of and actions regarding the agreement between the parties, Florida Crystals respectfully suggests that the Commission allot fifteen (15) minutes per side for the requested oral argument.

Respectfully submitted this 19th day of September, 2016.



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**CERTIFICATE OF SERVICE**

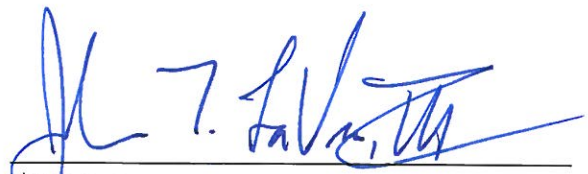
I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following, by electronic delivery, on this 19th day of September, 2016.

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