

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to resolve territorial dispute in)
Sumter County and/or Lake County with)
City of Leesburg and/or South Sumter Gas)
Company, LLC, by Peoples Gas System)
_____)

Docket No. 20180055-GU
Filed: April 2, 2018

SOUTH SUMTER GAS COMPANY REQUEST FOR ORAL ARGUMENT

South Sumter Gas Company, LLC (“SSGC”), pursuant to Rule 2522.058, Florida Administrative Code (“F.A.C.”), hereby requests that the Commission allow oral argument on the Motion to Dismiss the Peoples Gas System (“PGS”) Petition (“Petition”) in the above stated matter filed by SSGC contemporaneously with this Request. SSGC believes that oral argument will aid the Commission in fully comprehending the legal shortcomings of the Petition, the underlying factual situation involving the various parties, and the very significant policy issues raised by PGS that impact the present and future development and residents of Sumter County and Lake County as well as the City of Leesburg.

PGS is seeking to use this Commission for an unprecedented and outrageous land grab to lock up all of Sumter County and parts of Lake County that are not now presently subject to any natural gas territorial agreement or order of this Commission. Such far reaching requests are neither ripe nor appropriate for action, especially as requested by PGS. Further, PGS is seeking to use this proceeding to tortuously interfere with the business relationship between SSGC, the City of Leesburg, and The Villages Land Company, LLC by delaying and significantly and materially changing the lawfully approved development plan for the Village of Southern Oaks as is set forth in more detail in the Motion to Dismiss. PGS also seeks to obstruct lawful business and governmental

decisions involving SSGC, and to strip away the orderly and timely development of The Villages Communities, the largest single site, master planned community in the United States. The Villages Community could moot this entire issue by simply deciding to build all-electric homes and businesses, but that is not necessarily in the long term best interests of the public. Oral argument, with participation by all the parties, will enable them to represent their various interests and allow the Commission to consider the far ranging and extensive consequences of the illegal, unnecessary, and inappropriate actions sought by PGS in this docket.

WHEREFORE, SSGS respectfully requests that the Commission grant oral argument on its Motion to Dismiss filed contemporaneously herewith. While SSGC and the City of Leesburg are certainly aligned with respect to the underlying service Agreement attached to the Petition, because their ultimate interests in this matter may be different, SSGC respectfully suggests that the Commission allot ten minutes per party for the requested oral argument.

Respectfully submitted this 2nd day of April, 2018.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 2nd day of April, 2018, to the following:

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