BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida City Gas

Docket No. 20220069-GU

Filed: June 30, 2023

FLORIDA CITY GAS RESPONSE TO OFFICE OF PUBLIC COUNSEL REQUEST FOR ORAL ARGUMENT

Florida City Gas ("FCG" or "the Company"), hereby files this response in opposition to the Office of Public Counsel's ("OPC") Request for Oral Argument ("Request") on OPC's Motion for Reconsideration of the Florida Public Service Commission ("Commission") Order No. PSC-2023-0177-FOF-GU issued on June 9, 2023 ("Rate Order"). As explained below, oral argument is entirely unnecessary and would be nothing more than a needless waste of time and resources. In support, FCG states as follows:

1. Granting or denying a request for oral argument is within the sole discretion of the Commission. Rule 25-22.0022(3), F.A.C. However, a "request for oral argument *shall state with particularity why oral argument would aid* the Commissioners ... in understanding and evaluating the issues to be decided. Rule 25-22.0022(1), F.A.C. (emphasis).

2. Other than merely repeating the standard required by the Rule, OPC's Request fails to offer any reason **why** oral argument would aid the Commission in understanding and evaluating the issues in OPC's Motion for Reconsideration.

3. The two contentions raised in OPC's Motion for Reconsideration are straightforward and do not require any further explanation through oral argument. Indeed, OPC has offered nothing specific to support its request for oral argument.

4. FCG submits that OPC's Motion for Consideration and FCG's Response are

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sufficient on their face to evaluate and decide OPC's Motion for Reconsideration without the need for further argument or explanation.

5. Under the specific facts and circumstances present here, FCG submits that oral argument is entirely unnecessary and would not be a prudent use of time and resources of the Commission, Staff, or the parties.

WHEREFORE, for all the foregoing reasons, FCG respectfully requests that the Commission deny OPC's Request for Oral Argument.

Respectfully submitted this 30th day of June 2023,

By: <u>/s/ Christopher T. Wright</u> Christopher T. Wright Fla. Auth. House Counsel No. 1007055 Joel T. Baker Fla. Bar No. 0108202 Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 Email: <u>christopher.wright@fpl.com</u> Email: joel.baker@fpl.com

Beth Keating Fla. Bar No. 0022756 Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601Tallahassee, FL 32301 Email: <u>BKeating@gunster.com</u>

Attorneys for Florida City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 30th day of June 2023:

Adria Harper, Esquire	Office of Public Counsel
Timothy Sparks, Esquire	c/o The Florida Legislature
Florida Public Service Commission	111 West Madison Street, Room 812
2540 Shumard Oak Boulevard	Tallahassee, FL 32399-1400
Tallahassee, FL 32399	Gentry.richard@leg.state.fl.us
AHarper@psc.state.fl.us	rehwinkel.charles@leg.state.fl.us
TSparks@psc.state.fl.us	wessling.mary@leg.state.fl.us
For Commission Staff	For Office of Public Counsel
Jon C. Moyle, Jr.	T. Jernigan/H. Buchanan/E. Payton/R.
Karen A. Putnal	Franjul/M.Duffy
Moyle Law Firm, P.A.	139 Barnes Drive, Suite 1
118 North Gadsden Street	Tyndall AFB FL 32403
Tallahassee, Florida 32301	thomas.jernigan.3@us.af.mil
jmoyle@moylelaw.com	holly.buchanan.1@us.af.mil
kputnal@moylelaw.com	ebony.payton.ctr@us.af.mil
mqualls@moylelaw.com	rafael.franjul@us.af.mil
	ULFSC.Tyndall@us.af.mil
For Florida Industrial Power Users Group	marcus.duffy.3@us.af.mil
	For Federal Fusering Agencies
	For Federal Executive Agencies

<u>/s/ Christopher T. Wright</u> Christopher T. Wright

Christopher T. Wright Fla. Auth. House Counsel No. 1007055 *Attorney for Florida City Gas*