BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

)

)

In re: Review of the retail rates of Florida Power & Light Company. Docket No. 001148-EI Dated: March 1, 2002

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR ORAL ARGUMENT CONCERNING ITS MOTION FOR RECONSIDERATION OF ORDER NO. PSC-02-0254-PCO-EI, GRANTING MOTION TO COMPEL

Florida Power & Light Company ("FPL"), hereby requests that oral argument be heard on its motion for reconsideration of Order No. PSC-02-0254-PCO-EI, which grants the Motion of South Florida Hospital and Healthcare Association ("SFHHA") to Compel Discovery Responses. FPL believes that oral argument would assist in understanding the precise nature of the SFHHA discovery that is the subject of its Motion to Compel and the extent to which FPL already has responded to the legitimate scope of that discovery, as well as to elucidate the controlling principles of law.

Respectfully submitted,

R. Wade Litchfield, Esq. Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 Telephone: 561-691-7101 Steel Hector & Davis LLP Attorneys for Florida Power & Light Company 200 South Biscayne Boulevard Suite 4000 Miami, Florida 33131-2398 Telephone: 305-577-2939

By:

John T. Butler, P.A. Fla. Bar No. 283479

DOCUMENT NUMBER - DATE

02437 MAR-18

STEEL HECTOR & DAVIS LLP

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by United States Mail this 1st day of March, 2002, to the following:

Robert V. Elias, Esq. Legal Division Florida Public Service Commission 2540 Shumard Oak Boulevard Room 370 Tallahassee, FL 32399-0850

Thomas A. Cloud, Esq. Gray, Harris & Robinson, P.A. 301 East Pine Street, Suite 1400 Orlando, Florida 32801

Michael B. Twomey, Esq. Post Office Box 5256 Tallahassee, FL 32314-5256

Joseph A. McGlothlin, Esq. Vicki Gordon Kaufman, Esq. McWhirter Reeves 117 South Gadsden Tallahassee, Florida 32301

Linda Quick, President South Florida Hospital & Healthcare Assn 6363 Taft Street Hollywood, FL 33024 Florida Industrial Power Users Group c/o John McWhirter, Jr., Esq. McWhirter Reeves 400 North Tampa Street, Suite 2450 Tampa, FL 33601-3350

J. Roger Howe, Esq. Office of Public Counsel c/o Florida Legislature 111 W. Madison Street Room No. 812 Tallahassee, Florida 32399-1400

Andrews & Kurth Law Firm Mark Sundback/Kenneth Wiseman 1701 Pennsylvania Ave., NW, Ste. 300 Washington, DC 20006

David Cruthirds, Esq. Vice President and Regulatory Counsel Dynegy, Inc. 1000 Louisiana Street, Suite 5800 Houston, Texas 77002-5050

John T. Butler, P.A. By:

- 2 -