

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for issuance of an order to the)
City of Leesburg and South Sumter Gas)
Company, LLC, to show cause why they)
should not be regulated by the Commission)
as a public utility as defined in Section)
366.02(1), Florida Statutes, etc.)
_____)

Docket No. 20180085-GU

CITY OF LEESBURG’S REQUEST FOR ORAL ARGUMENT

The City of Leesburg (“The City”), pursuant to Rule 25-22.0022, Florida Administrative Code (F.A.C.), hereby requests that the Commission grant oral argument concerning the City’s Motion to Dismiss filed simultaneously in the above-styled docket. In support thereof, the City states:

1. The City has filed with the Commission today a Motion to Dismiss the Petition filed by People Gas System (“PGS”). The City’s Motion makes a number of legal points and arguments as to why the PGS petition should be dismissed, why an order to show cause should not be issued, and why the issuance of a declaratory statement should not be issued.

2. The Petition filed by PGS is atypical in the nature of the relief sought and the request that the Commission consider alternative relief. Oral argument will aid the Commission in understanding and evaluating the basis and arguments supporting the City’s Motion to Dismiss and the positions of the City and the other parties.

3. Rule 25-22.0022(7)(a) and (b), F.A.C., contemplate that oral argument may be permitted on dispositive motions, such as a motion to dismiss.

3. The City requests that each party be granted ten (10) minutes for oral argument.

WHEREFORE, the City requests that the Commission grant its Request for Oral Argument.

Respectfully submitted this 26th day of April, 2018.

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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 Mail, on this 26th day of April, 2018:

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