

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

In re: Territorial Dispute Between )  
Okefenoke Rural Electric Membership )  
Corporation, and the Jacksonville )  
Electric Authority of the City of )  
Jacksonville, in Duval County. )  
\_\_\_\_\_ )

DOCKET NO. 911141-EU  
Filed: January 13, 1992

REQUEST FOR ORAL ARGUMENT

The OKEFENOKE RURAL ELECTRIC MEMBERSHIP CORPORATION ("OREMC" or "Okefenoke"), by and through its undersigned counsel and in accordance with Section 25-22.058, Florida Administrative Code, files this Request for Oral Argument, and says:

1. On December 31, 1991, the Jacksonville Electric Authority ("JEA") filed a Motion to Dismiss this proceeding on ground that the Commission allegedly does not have jurisdiction over this territorial dispute. On January 13, 1992 OREMC filed its Memorandum of Law in Opposition to JEA's Motion to Dismiss explaining why the Commission does have jurisdiction to decide this dispute.

2. JEA's Motion to Dismiss raises potentially important issues regarding the Commission's jurisdiction to decide territorial disputes involving municipal electric utilities. Oral argument will aid the Commission in its comprehension and evaluation of the issues raised by JEA's motion by providing a forum for the discussion of the facts in this case and the related policy implications.

3. Accordingly, OREMC respectfully requests that the Commission grant its Request for Oral Argument to be held at a

DOCUMENT NUMBER-DATE

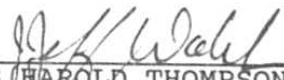
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FPSC-RECORDS/REPORTING

regularly scheduled Agenda Conference or at some other time determined by the Commission.

DATED this 13<sup>th</sup> day of January, 1992.

Respectfully submitted,

  
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ATTORNEYS FOR OREMC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Oral Argument has been furnished by U.S. Mail\* this 13<sup>th</sup> day of January, 1992, to the following:

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