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Sent: Friday, April 15, 2011 4:44 PM
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Subject: e-filing (Dkt. No. 110009-EI)
Attachments: 110009.OPC's response.oral argument.sversion.doc

Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 110009-EI

In re: Nuclear Cost Recovery Clause.

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 3 pages.

e. The document attached for electronic filing is OPC's Response to Rajiv Kandulkar's Request for Oral Argument on Pending Motion to Quash Deposition Subpoena.
(See attached file: 110009.OPC's response.oral argument.sversion.doc)

Thank you for your attention and cooperation to this request.

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DOCUMENT NUMBER-DATE
02610 APR 15 =
FPSC-COMMISSION CLERK

4/15/2011

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery
Clause.

DOCKET NOS: 110009-EI
FILED: April 15, 2011

**OPC'S RESPONSE TO RAJIV KANDULKAR'S REQUEST FOR
ORAL ARGUMENT ON PENDING MOTION TO QUASH DEPOSITION SUBPOENA**

The Citizens of the State of Florida, through the Office of Public Counsel ("OPC"), hereby respond to the Request for Oral Argument that Counsel for Rajiv Kandulkar submitted with the Motion to Quash on April 12, 2011.

OPC's position is that the issue presented by the Motion to Quash and OPC's response thereto is straightforward, the legal standard governing the scope of discovery depositions is well established, and the pleadings fully present the parties' respective positions and arguments. Accordingly, OPC disagrees that oral argument is needed to elucidate the points presented for ruling. However, if the Prehearing Officer believes oral argument would be helpful, OPC is prepared to participate.

J. R. Kelly
Public Counsel

s/ Joseph A. McGlothlin
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Attorneys for the Citizens
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DOCUMENT NUMBER DATE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and foregoing **OPC'S RESPONSE TO RAJIV KANDULKAR'S REQUEST FOR ORAL ARGUMENT ON PENDING MOTION TO QUASH DEPOSITION SUBPOENA** has been furnished by electronic mail and/or U.S. Mail on this 15th day of April, 2011, to the following:

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