ORIGINAL

JAR 31 PH 4: 2!

EUENTIA POC

COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Naming of)	Docket No. 050008-OT
Qualified Representative)	
)	Filed: March 31, 2005

REQUEST FOR NAMING OF QUALIFIED REPRESENTATIVE

Pursuant to Rule 28-107.107, Florida Administrative Code, White Springs

Agricultural Chemicals, Inc. d/b/a PCS Phosphate — White Springs ("White Springs")

respectfully requests that Mr. Andrew K. Soto, attorney with Sutherland Asbill &

Brennan LLP, be named a qualified representative of White Springs in all docketed and
non-docketed matters presently open and opened during the next twelve months. White

Springs is aware that it can be represented by counsel as defined in Rule 28-106.106,

Florida Administrative Code, and also may elect such representation.

Attached hereto is a sworn affidavit setting forth Mr. Soto's qualifications. Mr. Soto's business address is Sutherland Asbill & Brennan LLP, 1275 Pennsylvania Avenue, N.W., Washington, DC 20004-2415, and his business telephone number is 202-383-0100.

	RECEIVED & FILED
	EPSC-BURBAU OF RECORDS
WO 278048 2	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	WO 279069 2

CMP

Wherefore, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs respectfully requests that the Commission grant this Request for Naming of Qualified Representative.

Respectfully submitted,

C. Everett Boyd, Jr.

Sutherland Asbill & Brennan LLP 2282 Killearn Center Blvd. Tallahassee, FL 32309-3576 (850) 894-0015 (phone) (850) 894-0030 (fax)

Florida Bar No. 0190960

Counfay of

Attorneys for White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs

March 31, 2005

Affidavit

Andrew K. Soto, being first duly sworn, states that:

I am currently an attorney with the law firm Sutherland Asbill & Brennan LLP.

I represent White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate -White Springs ("White Springs") on regulatory matters before state and federal regulatory agencies.

I have prepared this Affidavit in connection with White Springs' request that I be named a qualified representative of White Springs in all docketed and non-docketed matters before the Florida Public Service Commission ("Commission").

I possess the necessary qualifications to responsibly represent White Springs in all docketed and non-docketed matters before the Commission.

I am an attorney admitted to practice in and a member in good standing of the bar of the District of Columbia; have practiced extensively before utility regulatory agencies and authorities, including the Federal Energy Regulatory Commission, the Bonneville Power Administration, the Oregon Public Utility Commission, and the Washington Utilities and Transportation Commission; have knowledge of the Florida Statutes relative to the Commission's jurisdiction; have knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings; have knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in administrative proceedings; have acquired or will acquire knowledge of the factual and legal issues in these matters; and have knowledge of, am in compliance with and will comply with the Standards of Conduct for qualified representatives contained in Rule 28-106.107, Florida Administrative Code.

Name and address:

Andrew K. Soto

Sutherland Asbill & Brennan LLP 1275 Pennsylvania Avenue, N.W. Washington, DC 20004-2415

My commission expir

SANJUANA ROBLEDO MY COMMISSION EXPIRES November 19, 2005

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Request for Naming of Qualified Representative has been furnished by U.S. Mail this 31st day of March, 2005 to the following:

Beth Keating, Esq. Office of General Counsel Room 370 Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Daniel E. Frank