### **Eric Fryson**

From:

Al Taylor [Al.Taylor@bbrslaw.com]

Sent:

Friday, January 04, 2013 4:22 PM

To:

Filings@psc.state.fl.us

Subject:

Docket 130008-OT - PCS Phosphate Request for Qualified Representative (Taylor)

Attachments: 2013\_QualRep\_ATaylor.pdf

a. Person responsible for filing

F. Alvin Taylor

Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson Street, N.W.

Eighth Floor West Tower Washington, D.C. 20007 Tel: (202) 342-0800

Fax: (202) 342-0807 ataylor@bbrslaw.com

- b. Docket No. 130008-OT, In Re: Applications for qualified representative status
- c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate White Springs
- d. Total Pages = 5
- e. Request for Naming of Qualified Representative (Taylor)

F. Alvin Taylor
BRICKFIELD BURCHETTE RITTS & STONE, PC
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CMS Updated by D. Menasco on

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Applications for qualified representative status	) ) )	Docket No. 130008-OT Filed: January 4, 2013
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# REQUEST FOR NAMING OF QUALIFIED REPRESENTATIVE

Pursuant to Rules 28-106.106 and 28-106.107, Florida Administrative Code, White Springs Agricultural Chemicals Inc. d/b/a PCS Phosphate – White Springs ("White Springs") requests that F. Alvin Taylor, an attorney with the law firm Brickfield, Burchette, Ritts & Stone P.C., be named a qualified representative for White Springs in Docket No. 130001-EI, In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive, Docket No. 130002-EI, In Re: Energy Conservation Cost Recovery Clause, Docket No. 130007-EI, In re: Environmental Cost Recovery Clause, Docket No. 130009-EI, In re: Nuclear Cost Recovery Clause, Docket No. 100437-EI, Examination of the Outage and Replacement Fuel/Power Costs Associated with the CR3 Steam Generator Replacement Project, by Progress Energy Florida, Inc., and in all other docketed and non-docketed matters before the Commission.

1. Mr. Taylor's business address is as follows:

F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone P.C.
1025 Thomas Jefferson St., NW, Eighth Floor, West Tower
Washington, D.C. 20007
(202) 342-0800
(202) 342-0807
ataylor@bbrslaw.com

2. Consistent with Rule 28-106.106(2)(b), White Springs is aware that it can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1) of the Florida

Administrative Code.

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3. White Springs submits that Mr. Taylor possesses the necessary qualifications to continue to responsibly represent White Springs' interests in these matters. In this regard, Mr. Taylor's qualifications are set forth in the attached affidavit.

4. As reflected in Mr. Taylor's affidavit, he: (i) is an attorney admitted to practice in the State of Maryland and the District of Columbia, (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding, and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding.

5. Consistent with the standard set forth in Rule 28-106.107, Mr. Taylor has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of White Springs is concerned in the above-referenced matters.

WHEREFORE, for the above and foregoing reasons, White Springs respectfully requests that this Request for Naming of Qualified Representative be granted.

Respectfully submitted,

Karin S. Totain

Legal Counsel

PCS Administration (USA), Inc.

Suite 400

1101 Skokie Boulevard

Northbrook, IL 60062

KSTorain@potashcorp.com

(847) 849-4291

January 2013

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request for Naming of Qualified Representative has been furnished electronically and/or by U.S. Mail to the following on this 4th day of January, 2013:

S. Curtis Kiser General Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

F. Alvin Taylor

Brickfield, Burchette Ritts & Stone P.C.

1025 Thomas Jefferson St., NW

Eighth Floor, West Tower Washington, D.C. 20007

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Applications for qualified	)	Docket No. 130008-OT
representative status	)	Filed: January 4, 2013

#### **AFFIDAVIT**

### F. ALVIN TAYLOR, being first duly sworn, states that:

- 1. I am an attorney with the law firm Brickfield, Burchette, Ritts & Stone P.C.
- 2. I represent White Springs Agricultural Chemicals Inc. d/b/a PCS Phosphate White Springs ("White Springs") in connection with certain regulatory matters relating to energy services.
- 3. 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 have previously requested and received qualified representative status for White Springs concerning matters before the Commission.
- 4. I possess the necessary qualifications to responsibly represent White Springs in all docketed and non-docketed matters before the Commission.
- 5. I am a member in good standing of the bars of Maryland and the District of Columbia; and have practiced before utility regulatory agencies and authorities, including the Commission, the Federal Energy Regulatory Commission, the Nuclear Regulatory Commission, the Maryland Public Service Commission, the Public Utility Commission of Texas and the Louisiana Public Service Commission.

6. I have knowledge of the Florida Statutes relevant to the Commission's jurisdiction; knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings; knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in administrative proceedings. I 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.

I declare that the foregoing is true and correct based on my knowledge, information, and

belief.

F. Alvin Taylor

Name and address:

F. Alvin Taylor

Brickfield, Burchette, Ritts & Stone, P.C.

1025 Thomas Jefferson Street, NW

Washington, DC 20007

SWORN TO AND SUBSCRIBED before me this 4th day of January, 2013.

District of Columbia

SS.

)

Notary Public

My Commission expires:

PAMELA G. GROSS
NOTARY PUBLIC DISTRICT OF COLUMBIA
May Commission Expires April 14, 2017