BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In Re: Applications for qualified representative status |) | Docket No. 20200008-0T Filed: January 7, 2020 |
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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 James W. Brew, an attorney with the law firm Stone Mattheis Xenopoulos & Brew, PC, be named a qualified representative for White Springs in Docket No. 20200001-EI, In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive, Docket No. 20200002-EI, In Re: Energy Conservation Cost Recovery Clause, Docket No. 20200007-EI, In re: Environmental Cost Recovery Clause, and in all other docketed and non-docketed matters before the Commission.

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

James W. Brew
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., NW
Suite 800 West
Washington, D.C. 20007
(202) 342-0800
(202) 342-0807 (fax)
jbrew@smxblaw.com

2. Consistent with Rule 25-106.106(2)(a), 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.

3. White Springs submits that Mr. Brew possesses the necessary qualifications to continue to

responsibly represent White Springs' interests in these matters. In this regard. Mr. Brew's

qualifications are set forth in the attached affidavit.

4. As reflected in Mr. Brew's affidavit, he: (i) is an attorney admitted to practice in the State

of New York State 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. Brew 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,

Jessica E. DeMonte

Senior Counsel

PCS Administration (USA), Inc.

Suite 400

1101 Skokie Boulevard

Northbrook, IL 60062

jessica.demonte@potashcorp.com

(847) 849-4291

Dated: January 1, 2020

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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 7th day of January, 2020:

Ms. Carlotta S. Stauffer Commission Clerk Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Kenneth M. Rubin Florida Power & Light Company 700 Universe Boulevard Juno Beach FL 33408 ken.rubin@fpl.com

Marsha E. Rule Rutledge Law Firm Post Office Box 551 Tallahassee FL 32301 marsha@reuphlaw.com R. Wade Litchfield Florida City Gas & Florida Power & Light Company 700 Universe Boulevard Juno Beach FL 33408 Wade.litchfield@fpl.com

Jason A. Higginbotham
Florida Power & Light Company
100 Universe Boulevard
Juno Beach FL 33408
Jason.higginbotham@fpl.com

Katie Chiles Ottenweller Vote Solar 151 Estoria Street SE Atlanta GA 30316 katie@votesolar.org

/s/ Laura Wynn Baker Laura Wynn Baker

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AFFIDAVIT

JAMES W. BREW, being first duly sworn, states that:

- 1. I am an attorney with the law firm Stone Mattheis Xenopoulos & Brew, PC.
- 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 New York State and the District of Columbia; and have practiced extensively before utility regulatory agencies and authorities, including the Commission, the Public Service Commissions of New York, Kentucky, Mississippi, Missouri, Pennsylvania, Rhode Island and Indiana, and the Federal Energy Regulatory 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.

James W. Brew

Name and address:

James W. Brew

Stone Mattheis Xenopoulos & Brew, PC

1025 Thomas Jefferson Street, NW

Suite 800 West

Washington, DC 20007

SWORN TO AND SUBSCRIBED before me this ___day of January, 2020.

District of Columbia

SS.

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O EXP O 4-14-22

PAMELA G. GROSS NOTARY PUBLIC DISTRICT OF COLUMBIA My Commission Expires April 14, 2022

My Commission expires: