

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for Qualified ) DOCKET NO. 20250008-OT  
Representative Status )  
\_\_\_\_\_ ) Dated: July 2, 2025

**REQUEST TO NAME BIANCA BLANSHINE AS QUALIFIED REPRESENTATIVE**

Pursuant to Rules 28-106.106, Florida Administrative Code, Florida Rising, Inc. (“Florida Rising”), LULAC Florida, Inc., better known as the League of United Latin American Citizens of Florida (“LULAC”), and Environmental Confederation of Southwest Florida, Inc. (ECOSWF) (collectively “FEL”) request that Bianca Blanshine be named as FEL’s qualified representative for Docket No. 20250011-EI currently before the Florida Public Service Commission (“Commission”). FEL is aware that it can be represented solely by counsel as defined in Rule 28-106.106(1), Florida Administrative Code, and has chosen to be represented by Bianca Blanshine because of the additional services that she can provide in addition to Florida-barred attorneys Bradley Marshall, Jordan Luebkekmann, and Danielle McManamon.

Enclosed with this request is a sworn affidavit setting forth Ms. Blanshine’s qualifications. As reflected in Ms. Blanshine’s affidavit, Ms. Blanshine is a law student that has completed two years of law school, has reviewed those portions of the Florida Statutes related to the Commission’s jurisdiction and requirements as it relates to rate cases, has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding, has reviewed the rules of evidence, including the concept of hearsay in an administrative proceeding, has reviewed the rules contained in Title 25 of the Florida Administrative Code as it relates to the Florida Public Service Commission and rate cases, has reviewed the rules contained in Title 28 of the Florida Administrative Code as it relates to the procedures employed in Docket No.

20250011-EI, has reviewed and will maintain compliance with Florida Administrative Code Rule 18-106.107, and has acquired knowledge of the factual and legal issues involved in Docket No. 20250011-EI in which she will represent the interests of FEL. Her business address is 4500 Biscayne Blvd., Suite 201, Miami FL 33137. Ms. Blanshine's email address is [bblanshine@earthjustice.org](mailto:bblanshine@earthjustice.org), and her phone number is 503-688-3004.

WHEREFORE, FEL respectfully requests that the Florida Public Service Commission grant this request and name Bianca Blanshine as a qualified representative for FEL in Docket No. 20250011-EI.

RESPECTFULLY SUBMITTED this 2nd day of July, 2025.

/s/ Bradley Marshall  
Florida Bar No. 98008  
Email: [bmarshall@earthjustice.org](mailto:bmarshall@earthjustice.org)  
Jordan Luebke  
Florida Bar No. 1015603  
Email: [jluebke@earthjustice.org](mailto:jluebke@earthjustice.org)  
Earthjustice  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, Florida 32301  
T: (850) 681-0031  
Fax: (850) 681-0020

Danielle McManamon  
Florida Bar No. 1059818  
[dmcmanamon@earthjustice.org](mailto:dmcmanamon@earthjustice.org)  
Earthjustice  
4500 Biscayne Blvd., Ste. 201  
Miami, FL 33137  
T: 305.440.5432  
F: 850.681.0020

***Counsel for and authorized on behalf of  
League of United Latin American Citizens  
of Florida, Florida Rising, and  
Environmental Confederation of Southwest  
Florida***

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for Qualified ) DOCKET NO. 20250008-OT  
Representative Status )  
\_\_\_\_\_ ) Dated: July 2, 2025

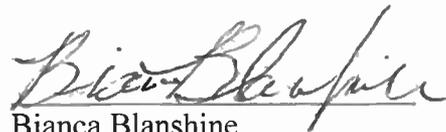
**AFFIDAVIT OF BIANCA BLANSHINE**

I, Bianca Blanshine, being first duly sworn, do hereby depose and state as follows:

1. I am a law student and Law Clerk for Earthjustice supervised by Bradley Marshall (FL Bar No. 98008) and Jordan Luebkekmann (FL Bar No. 1015603). I possess the necessary qualifications to responsibly represent FEL in Docket No. 20250011-EI. I have completed two years of law school at Stanford University.

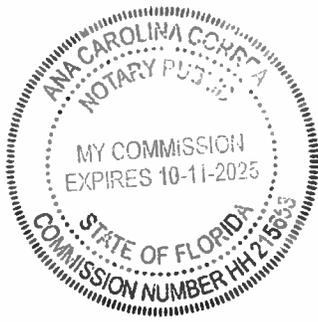
2. I have knowledge of the Florida Statutes relating to the Commission's jurisdiction, knowledge regarding the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding, and knowledge regarding the rules of evidence, including the concept of hearsay, in an administrative proceeding. I have acquired knowledge of the factual and legal issues in these matters and have knowledge of and will comply with the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107, Florida Administrative Code. I reviewed the rules contained in Title 25 of the Florida Administrative Code as it relates to the Florida Public Service Commission and rate cases and have reviewed the rules contained in Title 28 of the Florida Administrative Code as it relates to the procedures employed in Docket No. 20250011-EI

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



Bianca Blanshine  
Law Clerk  
Earthjustice  
4500 Biscayne Blvd., Suite 201  
Miami, FL 33137  
(503) 688-3004  
bblanshine@earthjustice.org

Affirmed and subscribed before me this 2nd day of July, 2025, by Bianca Blanshine, who ( )  
is personally known to me; or ( ) who has presented proper identification.



Ana C. Correa

Notary Public

My Commission expires: 10/11/2025

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 2nd day of July, 2025, via electronic mail on:

Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

DATED this 2nd day of July, 2025.

/s/ Bradley Marshall  
Attorney