



Writer's Direct Dial:
(561) 691-7101

R. Wade Litchfield
Senior Attorney
Florida Authorized House Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 691-7103 (Facsimile)

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RECORDS AND
REPORTING

June 28, 1998

VIA HAND DELIVERY

Ms. Blanca S. Bayò
Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

**Re: Florida Power & Light Company's Request for
Representation by a Qualified Representative;
Docket No. 990692-EI**

Dear Ms. Bayò:

I enclose and hand you herewith for filing, the original and fifteen (15) copies of Florida Power & Light Company's Request for Representation by a Qualified Representative in the above-referenced matter.

Please do not hesitate to contact me should you or your Staff have any questions regarding this filing.

Thanking you for your attention to this matter, I remain

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely,

R. Wade Litchfield

RWL/mm
Enclosures

- VFA
- APP
- CAF
- CMU
- CTR
- ENG
- LEG
- MAS
- OPC
- RRR
- SEC
- WAW
- OTH

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

3. This Petition is filed pursuant to Rule 28-106.106 of the Florida Administrative Code. Rule 28-106.106(2)(a) requires that the Company submit a written request with the presiding officer in the event that the Company elects to be represented before the Commission by a qualified representative. The Company hereby submits such request.

4. The Company seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of the Company for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 990689-EI.

R. Wade Litchfield
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
(561) 691-7101

5. Consistent with Rule 25-106.106(2)(b), the Company hereby affirms that it is aware of the services Mr. Litchfield can provide and, further, that the Company can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1). Indeed, the Company has elected or may elect to be represented in this matter by other attorneys in addition to Mr. Litchfield.

6. The Company submits that Mr. Litchfield possesses the necessary qualifications to responsibly represent the Company’s interests in this matter. In this regard, Mr. Litchfield’s qualifications are set forth in the attached affidavit.


7. As reflected in Mr. Litchfield's affidavit, he: (i) is an attorney admitted to practice in the States of New York and Louisiana; (ii) has practiced extensively before other utility regulatory agencies or authorities; (iii) has reviewed portions of the Florida Statutes relative to the Commission's jurisdiction; (iv) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (v) has reviewed portions of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding.

8. As further reflected in Mr. Litchfield's affidavit, he has been certified by the Supreme Court of Florida as "Authorized House Counsel" pursuant to Chapter 17 of the Rules Regulating the Florida Bar. As such, Mr. Litchfield is subject to the Rules Regulating the Florida Bar and to the jurisdiction of the Supreme Court of Florida for disciplinary purposes. Rule 17-1.2(4) of the Rules Regulating the Florida Bar. Mr. Litchfield has reviewed Rule 28-106.107 of the Florida Administrative Code (Standards of Conduct for Qualified Representatives), which standards of conduct are comprehended in the Rules Regulating the Florida Bar, and agrees to abide by same.

9. Consistent with the standard set forth in Rule 28-106.107, Mr. Litchfield has acquired or will acquire knowledge of the factual and legal issues involved insofar as his representation of the Company is concerned in the above-referenced proceedings.

WHEREFORE, for the above and foregoing reasons, Florida Power & Light Company respectfully requests that its Request for Representation by a Qualified Representative be granted.

Respectfully submitted



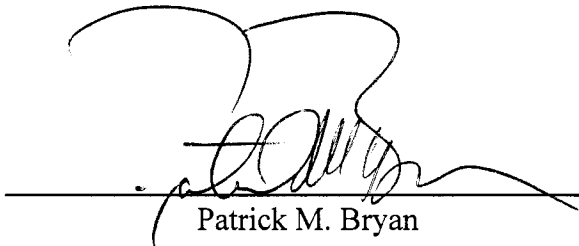
Patrick M. Bryan
Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
(561) 691-7083

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED COUNSEL, HEREBY CERTIFY that a copy of Florida Power & Light Company's Request for Representation by a Qualified Representative and accompanying Affidavit have been served via first class mail, postage prepaid to the parties listed below, this 28th day of June, 1999:

Florida Industrial Power Users Group
C/o John McWhirter, Jr.
McWhirter Reeves
P.O. Box 3350
Tampa, FL 33601-3350

McWhirter Law Firm
Joseph McGlothlin/Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301



Patrick M. Bryan

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: In the Matter of Florida Power & Light)
Company's Request for Confidential)
Classification of Certain Information in its)
FERC Form 1 filing for 1998.)
DOCKET NO. 990692-EI
Filed: June 28, 1999

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)
AFFIDAVIT OF R. WADE LITCHFIELD

BEFORE ME, the undersigned authority, personally appeared R. Wade Litchfield who, being first duly sworn, did depose and say:

1. My name is R. Wade Litchfield. I am currently employed by Florida Power & Light Company ("FPL") as Senior Attorney. My business address and telephone number are as follows:

700 Universe Boulevard
Juno Beach, Florida 33408-0420
(561) 691-7101

2. I have personal knowledge of the matters stated in this affidavit.

3. I am an attorney, admitted to the practice of law in the State of New York and in the State of Louisiana. I have practiced extensively before the Louisiana Public Service Commission, and the Council for the City of New Orleans, in matters relating to the regulation of utilities. Representing both gas and electric utilities, I have made appearances and participated in numerous regulatory proceedings. Such proceedings include general rate

cases and earnings reviews, as well as proceedings involving, among other subjects, rate design, rate application, depreciation rates, affiliate transactions, nuclear decommissioning, integrated resource planning, conservation programs, incentive rate plans, franchise or service territory rights, and pole attachments. I also have made appearances or participated in rulemaking and other proceedings before the Louisiana Commissioner of Conservation, the Public Utility Commission of Texas, the Arkansas Public Service Commission, the Federal Energy Regulatory Commission, and the Federal Communications Commission.

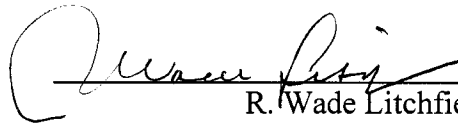
4. I have reviewed portions of the Florida Statutes relating to jurisdiction of the Florida Public Service Commission, and the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding. I also have reviewed portions of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding. The foregoing rules and statutory provisions generally are consistent with those with which I have experience and am familiar.

5. I have been certified by the Supreme Court of Florida as “Authorized House Counsel” pursuant to Chapter 17 of the Rules Regulating the Florida Bar. Accordingly, I am subject to the Rules Regulating the Florida Bar and to the jurisdiction of the Supreme Court of Florida for disciplinary purposes.

6. I have reviewed Rule 28-106.107 of the Florida Administrative Code and agree to abide by its standards.

7. Consistent with the standard set forth in Rule 28-106.107, I have acquired or will acquire knowledge of the factual and legal issues involved insofar as my representation of Florida Power & Light Company is concerned in the above-referenced proceeding.

8. Affiant says nothing further.



R. Wade Litchfield

SUBSCRIBED AND SWORN TO before me this 25th day of June 1999, by R. Wade Litchfield, who is personally known to me, and who did take an oath.



Notary Public, State of Florida

My Commission Expires: 12-13-02

