

ORIGINAL

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 041414-EI

IN RE: PROGRESS ENERGY FLORIDA, INC.'S PETITION FOR APPROVAL OF LONG-TERM CONTRACTS FOR HINES UNIT 4 AND ADDITIONAL SYSTEM SUPPLY AND TRANSPORTATION

REQUEST OF BG LNG SERVICES, LLC
FOR REPRESENTATION BY QUALIFIED REPRESENTATIVE

Pursuant to Rules 28-106.106 and 28-106.107 of the Florida Administrative Code, BG LNG Services, LLC ("BG"), requests approval by the Prehearing Officer of its request to be represented by a Qualified Representative in this proceeding. BG is filing a Petition to Intervene concurrent with this Request for Representation by Qualified Representative and desires to participate in this proceeding with the assistance of a Qualified Representative.

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1.

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BG respectfully requests that the Prehearing Officer recognize David Lyles Cruthirds,

CL _____

Attorney at Law, as its Qualified Representative pursuant to Rule 28-106.106 of the Florida

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MS _____

Administrative Code. BG's request is supported by the Affidavit of David Lyles Cruthirds

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which is appended to this filing. As stated in the Affidavit, Mr. Cruthirds is licensed by the State

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EC 1

Bar Association of Texas to practice law in the State of Texas and to appear before the highest

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courts in that state. Mr. Cruthirds is a member in good standing with the State Bar Association of

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

Texas. Mr. Cruthirds' state bar license number is 05195450. Mr. Cruthirds' address and contact information is:

David Lyles Cruthirds
Attorney at Law
4302 Cheena Drive
Houston, TX 77096
Office 713-726-0442
Fax 713-726-0432
e-mail david@thecruthirdsreport.com
Texas State Bar Number 05195450

2.

As explained in Rule 29-106.106, FAC, BG is aware that it has the right to be represented by counsel licensed in the State of Florida at its own expense and chooses to be represented by Mr. Cruthirds instead. The undersigned, Mr. David Keane, Vice President Policy and Corporate Affairs with BG North America, LLC is familiar with Mr. Cruthirds, his work and his capabilities, having been associated with Mr. Cruthirds in a variety of capacities since 1996. Mr. Cruthirds is qualified to appear in this administrative proceeding and is capable of representing BG's rights and interests. Mr. Cruthirds is familiar with and agrees to comply with the Standards of Conduct for Qualified Representatives as set forth in Rule 28-106.107 FAC.

Mr. Cruthirds is very familiar with the issues that are being addressed in this proceeding. Mr. Cruthirds is generally familiar with procedures in use by the Florida Commission and other state commissions in the southeast and agrees to abide by and follow the Florida Commission's procedural rules as well as any rulings, directives or other instructions issued by the Prehearing Officer or the Florida Commission.

3.

BG, being fully aware of its rights to counsel under Rule 28-106.106 of the Florida Administrative Code, respectfully requests permission to participate in the proceeding through the assistance of David Lyles Cruthirds as its duly recognized Qualified Representative. BG respectfully requests that the Prehearing Officer issue an appropriate order recognizing Mr. Cruthirds as BG's Qualified Representative.

Respectfully submitted:

s/David N. Keane

David N. Keane

Vice President, Policy and Corporate Affairs

BG North America, LLC

5444 Westheimer, Suite 1200

Houston, TX 77056

CERTIFICATE OF SERVICE

I hereby certify that I have, this 30th day of March 2005, served copies of the foregoing pleading upon the parties listed below, by depositing same, postage prepaid, with the United States Mail, through their counsel of record at their addresses reflected in the record.

Adrienne E. Vining, Esquire
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Patricia A. Christensen, Esquire
Office of the Public Counsel
c/o The Florida Legislature
11 West Madison St., Room 812
Tallahassee, FL 32399-1400

R. Alexander Glenn
Deputy General Counsel – Florida
Progress Energy Service Company, LLC
100 Central Avenue, Suite 1D
St. Petersburg, FL 33701

Carlton Fields Law Firm
Gary Sasso, James Walls, John Burnett
PO Box 3239
Tampa, FL 33601-3239

s/David Lyles Cruthirds

David Lyles Cruthirds