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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

MAR 31 PM 4:23

In re: Request for Naming of  
Qualified Representative )

Docket No. 050008-OT

COMMISSION  
CLERK

Filed: March 31, 2005

REQUEST FOR NAMING OF  
QUALIFIED REPRESENTATIVE

Pursuant to Rule 28-107.107, Florida Administrative Code, White Springs  
Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“White Springs”)  
respectfully requests that Mr. Daniel E. Frank, attorney with Sutherland Asbill &  
Brennan LLP, be named a qualified representative of White Springs in all docketed and  
non-docketed matters presently open and opened during the next twelve months. White  
Springs is aware that it can be represented by counsel as defined in Rule 28-106.106,  
Florida Administrative Code, and also may elect such representation.

Attached hereto is a sworn affidavit setting forth Mr. Frank’s qualifications. Mr.  
Frank’s business address is Sutherland Asbill & Brennan LLP, 1275 Pennsylvania  
Avenue, N.W., Washington, DC 20004-2415, and his business telephone number is 202-  
383-0100.

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
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EPSC-BUREAU OF RECORDS

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EPSC-COMMISSION OF ELECTRICITY

*Done  
04/01/05  
kmp* WO 378934.1

**Wherefore**, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs respectfully requests that the Commission grant this Request for Naming of Qualified Representative.

Respectfully submitted,



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C. Everett Boyd, Jr.  
Sutherland Asbill & Brennan LLP  
2282 Killearn Center Blvd.  
Tallahassee, FL 32309-3576  
(850) 894-0015 (phone)  
(850) 894-0030 (fax)  
Florida Bar No. 0190960

*Attorneys for  
White Springs Agricultural Chemicals, Inc.  
d/b/a PCS Phosphate – White Springs*

March 31, 2005

Affidavit

Daniel E. Frank, being first duly sworn, states that:

I am currently an attorney with the law firm Sutherland Asbill & Brennan LLP.

I represent White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“White Springs”) on regulatory matters before state and federal regulatory agencies.

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 possess the necessary qualifications to responsibly represent White Springs in all docketed and non-docketed matters before the Commission.

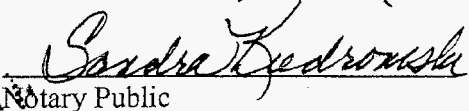
I am an attorney admitted to practice in, and a member in good standing of the bars of, the Commonwealth of Virginia and the District of Columbia; have practiced extensively before utility regulatory agencies and authorities, including the Commission, the Iowa Utilities Board, and the Federal Energy Regulatory Commission; have knowledge of the Florida Statutes relative to the Commission’s jurisdiction; have knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings; have knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in administrative proceedings; 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.



[signature]

Name and address: Daniel E. Frank  
Sutherland Asbill & Brennan LLP  
1275 Pennsylvania Avenue, N.W.  
Washington, DC 20004-2415

SUBSCRIBED AND SWORN to me  
this 3<sup>rd</sup> day of March, 2005.

  
Notary Public

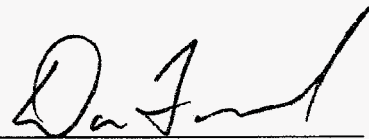
My commission expires: \_\_\_\_\_ My Commission Expires April 14, 2009



**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing Request for Naming of Qualified Representative has been furnished by U.S. Mail this 31st day of March, 2005 to the following:

Beth Keating, Esq.  
Office of General Counsel  
Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

A handwritten signature in black ink, appearing to read "Dan Frank", written over a horizontal line.

Daniel E. Frank