



NATURAL RESOURCES DEFENSE COUNCIL

November 2, 2006

Blanca Bayo  
Director, Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, Florida 32399-0850

*060635*  
**RE: Docket No. 060635-EU, Petition for determination of need for Electrical power plant in Taylor County by Florida Municipal Power Agency, JEA, Reedy Creek Improvement District, and City of Tallahassee.**

Dear Ms. Bayo:

Enclosed for filing in the above captioned docket are an original and fifteen copies of the Natural Resources Defense Council's (NRDC) **Expedited Request for Naming of a Qualified Representative**. Copies of this request have been served on the parties to this proceeding.

Thank you very much for your assistance.

Sincerely,

Patrice L. Simms

**BEFORE THE PUBLIC SERVICE COMMISSION**

In re: Petition for determination of need for )  
Electrical power plant in Taylor County by )  
Florida Municipal Power Agency, JEA, Reedy ) Docket No. 060635EU  
Creek Improvement District, and City of )  
Tallahassee. )

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**Expedited Request for Naming of a Qualified Representative**

Pursuant to Rule 28-106.106 and 28-106.107, Florida Administrative Code, The Natural Resources Defense Council (NRDC) requests that Patrice L. Simms, a Senior Project Attorney with NRDC, be named a qualified representative of NRDC in connection with the above captioned proceeding. NRDC is aware that it can be represented by counsel as defined in rule 28-106.106, Florida Administrative Code and may also elect such representation. Attached hereto is a sworn affidavit setting forth Mr. Simms' qualifications. Mr. Simms' address is 1200 New York Ave., NW, Washington, D.C., 20005, and his telephone number is (202) 289-2437.

NRDC asks the Commission to grant this request in connection with NRDC's Petition to Intervene in the above captioned docket proceeding, which is being filed today, Thursday, November 02, 2006.

**WHEREFORE**, for the above and foregoing reasons, NRDC respectfully requests that this Request for Naming of Qualified Representative be granted.

Respectfully submitted,

*/s/ John D. Walke*

John D. Walke  
Director, Clean Air Project  
Natural Resources Defense Council  
1200 New York Ave., NW  
Suite 400  
Washington, D.C. 20005  
(202) 289-6868

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for determination of need for )  
Electrical power plant in Taylor County by )  
Florida Municipal Power Agency, JEA, Reedy ) Docket No. 060635EU  
Creek Improvement District, and City of )  
Tallahassee. )

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**AFFIDAVIT OF PATRICE L. SIMMS**

**WASHINGTON, DISTRICT OF COLUMBIA**

1. My name is Patrice L. Simms. I am an attorney with the Natural Resources Defense Council (NRDC), a national non-profit environmental organization, and I represent NRDC in various setting on issues related to the permitting, constructions, and operation of electric generating units (including coal-fired power plants).

2. I am a member of good standing of the Bar of the District of Columbia and the Bar of the Commonwealth of Massachusetts. I have also practiced in the U.S. Federal Court of Appeals for the District of Columbia.

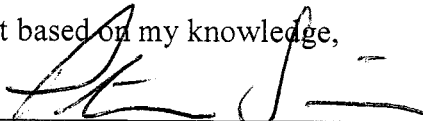
3. I am seeking to be designated as a qualified representative in the above-captioned docket proceeding in accordance with Rule 28-106.106, Florida Administrative Code, and expect that all work I perform in the Commission will be in conjunction with a member of the Florida Bar.

4. I have been a Senior Attorney with NRDC for more than year. Prior to joining NRDC I worked for nearly two years as a Counsel to Board with the U.S. EPA's Environmental Appeals Board, and before that for more than five years as a staff attorney with the U.S. EPA's Office of General Counsel, in the Air and Radiation Law Office.


5. I have never been disciplined, reprimanded, or otherwise sanction by any bar.

6. I am familiar with the relevant portions of the Florida Statutes, the Florida Rules of Civil Procedure, the Florida Administrative Code, the Florida Rules of Evidence, and Rule 28-106.107, Florida Administrative Code. Further, I expect that

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

  
Patrice L. Simms

Sworn and subscribed before me this 2nd day of November, 2006, by Patrice L. Simms, who is personally known to me.

  
NOTARY PUBLIC, Washington, D.C.

Gerard Janco  
Notary Public, District of Columbia  
My Commission Expires 7-31-2007