

Marguerite McLean

110008-OT

From: Al Taylor [Al.Taylor@bbrslaw.com]
Sent: Friday, January 07, 2011 4:10 PM
To: Filings@psc.state.fl.us
Cc: Jay Brew; 'skiser@psc.state.fl.us'
Subject: Docket 110008-OT - PCS Phosphate Request for Qualified Representative (Brew)
Attachments: 2011 PCS Request Qual Rep_Brew.pdf

a. Person responsible for filing

James W. Brew
 Brickfield, Burchette, Ritts & Stone, P.C.
 1025 Thomas Jefferson Street, N.W.
 Eighth Floor West Tower
 Washington, D.C. 20007
 Tel: (202) 342-0800
 Fax: (202) 342-0807
jwb@bbrslaw.com

b. Docket No. 110008-OT, In Re: Applications for qualified representative status

c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs

d. Total Pages = 5

e. Request for Naming of Qualified Representative (Brew)

F. Alvin Taylor
 BRICKFIELD BURCHETTE RITTS & STONE, PC
 1025 Thomas Jefferson St, N.W.
 Eighth Floor, West Tower
 Washington, DC 20007
 202-342-0800
 Fax: 202-342-0807
ataylor@bbrslaw.com

*1-10-11
 Parties
 added
 M. McLean*

DOCUMENT ID: 110008-001

00195 JAN-7 =

FPSC-COMMISSIONER-001

1/10/2011

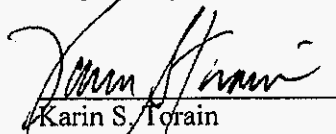
3. White Springs submits that Mr. Brew possesses the necessary qualifications to continue to responsibly represent White Springs' interests in these matters. In this regard, Mr. Brew's qualifications are set forth in the attached affidavit.

4. As reflected in Mr. Brew's affidavit, he: (i) is an attorney admitted to practice in the State of New York State and the District of Columbia, (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding, and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding.

5. Consistent with the standard set forth in Rule 28-106.107, Mr. Brew has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of White Springs is concerned in the above-referenced matters.

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

Respectfully submitted,



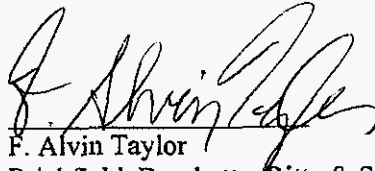
Karin S. Torain
Legal Counsel
PCS Administration (USA), Inc.
Suite 400
1101 Skokie Boulevard
Northbrook, IL 60062
KSTorain@potashcorp.com
(847) 849-4291

January 7, 2011

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request for Naming of Qualified Representative has been furnished electronically and/or by U.S. Mail to the following on this 7th day of January, 2011:

S. Curtis Kiser
General Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

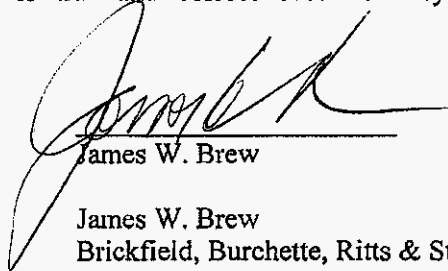


F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone P.C.
1025 Thomas Jefferson St., NW, Eighth Floor, West Tower
Washington, D.C. 20007

Kentucky, Missouri, Pennsylvania, Rhode Island and Indiana, and the Federal Energy Regulatory Commission.

6. I have knowledge of the Florida Statutes relevant to the Commission's jurisdiction; knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings; knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in administrative proceedings. I 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.

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



James W. Brew

Name and address:

James W. Brew
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW
Washington, DC 20007

SWORN TO AND SUBSCRIBED before me this 7th day of January, 2011.

District of Columbia) ss.



Notary Public
My Commission expires:

Lola C. Dickerson
Notary Public, District of Columbia
My Commission Expires 11/14/2015