



*Via E-Filing*

June 10, 2015

Carlotta S. Stauffer, Director  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399

**RE: Docket No. 150008-OT: Applications for Qualified Representative Status**

Dear Ms. Stauffer:

Please find enclosed for filing (in Docket No. 150008-OT) The Alliance for Solar Choice's *Request to Name Thadeus B. Culley as Qualified Representative* and attached affidavit. Do not hesitate to contact me if you have any questions regarding this filing.

Sincerely,



Gracie Walovich  
Senior Associate  
The Alliance for Solar Choice  
595 Market St, 29th Floor  
San Francisco, CA 94105  
Phone: 650-465-7558.  
[gracie@allianceforsolarchoice.com](mailto:gracie@allianceforsolarchoice.com)

Enclosures: *Request to Name Thadeus B. Culley as Qualified Representative*  
*Affidavit*  
*Certificate of Service*

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Applications for Qualified Representative Status    )  DOCKET NO. 150008-OT  
  )  
  )  FILED: June 10, 2015

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**REQUEST TO NAME THADEUS B. CULEY AS  
QUALIFIED REPRESENTATIVE**

Pursuant to Rule 28-106.106, Florida Administrative Code, The Alliance for Solar Choice (“TASC”) respectfully requests that Thadeus B. Culley, of the law firm Keyes, Fox & Wiedman LLP, be named as TASC’s qualified representative for all other docketed and non-docketed matters before the Florida Public Service Commission (“Commission”) during 2015.

1.    Mr. Culley’s business address is as follows:

Thadeus B. Culley  
Keyes, Fox & Wiedman LLP  
401 Harrison Oaks Blvd., Suite 100  
Cary, NC 27514  
(510) 314-8205  
[tculley@kfwlaw.com](mailto:tculley@kfwlaw.com)

2.    Consistent with Rule 28-106.106(2)(b), TASC is aware that it has the right to be represented by “counsel”, as that term is defined in Rule 28-106.106(1) and has chosen otherwise.

3.    TASC submits that Mr. Culley possesses the requisite qualifications to responsibly represent TASC’s interest in matters before the Commission. Mr. Culley’s qualifications are set forth in the attached affidavit.

4. As reflected in the attached affidavit, Mr. Culley: (i) is an attorney in good standing that is licensed to practice law in the states of North Carolina and California; (2) has reviewed the relevant portions of Florida Statutes relative to the Commission's jurisdiction; (iii) has reviewed the Florida Rules of Procedure relating to discovery rules in an administrative proceeding; and (iv) has reviewed 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. Mr. Culley has acquired or will acquire actual knowledge of the factual and legal issues involved in all docketed or non-docketed matters to which he will represent the interest of TASC.

**WHEREFORE**, for the above and foregoing reasons, TASC respectfully request that its Request to Name Thadeus B. Culley as Qualified Representative be granted.

Respectfully submitted this 10<sup>th</sup> day of June, 2015,

BY



Gracie Walovich  
Senior Associate  
The Alliance for Solar Choice  
595 Market St, 29th Floor  
San Francisco, CA 94105  
Phone: 650-465-7558.  
[gracie@allianceforsolarchoice.com](mailto:gracie@allianceforsolarchoice.com)

## CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing *Request to Name Thadeus B. Culley as Qualified Representative* to be furnished electronically and/or by U.S. Mail to the following on this 11<sup>th</sup> day of June, 2015:

Julie Phillips, Esq.  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

BY /s/

Thadeus B. Culley  
Keyes, Fox & Wiedman LLP  
401 Harrison Oaks Blvd., Suite 100  
Cary, NC 27513  
510-314-8205  
[tculley@kfwlaw.com](mailto:tculley@kfwlaw.com)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Applications for Qualified Representative ) DOCKET NO. 150008-OT  
Status )  
\_\_\_\_\_ )

**AFFIDAVIT**

**THADEUS B. CULLEY**, being first duly sworn, states that:

1. I am an attorney with the law firm Keyes, Fox & Wiedman LLP.
2. I represent The Alliance for Solar Choice (“TASC”) in regulatory matters related to distributed solar generation.
3. TASC has requested that I be named its Qualified Representative, pursuant to Rule 28-106.106, Florida Administrative Code, for all docketed and non-docketed matters before the Florida Public Service Commission (“Commission”).
4. I am a member in good standing with the state bars of California (Bar No. 271602) and North Carolina (Bar No. 47001), and my practice has focused exclusively on energy matters before state regulatory agencies, including the California Public Utilities Commission, the South Carolina Public Service Commission, and the North Carolina Utilities Commission.
5. I have knowledge of the following: the Florida Statutes relevant to the Commission’s jurisdiction; the Florida rules of Civil Procedure relating to discovery in administrative proceedings; and the Florida Administrative Code and Florida Statutes relative to the rules of Evidence, including the concept of hearsay in administrative proceedings.

6. I have knowledge or will acquire knowledge of the factual and legal issues in the matters to which I will participate on behalf of TASC as a Qualified Representative.

7. I am in compliance with and will continue to comply with the Standards of Conduct for Qualified Representatives enumerated in Rule 28-106.107, Florida Administrative Code.

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



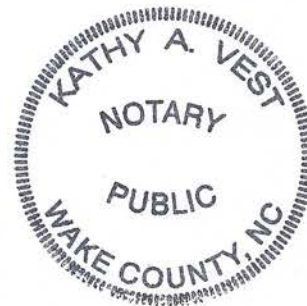
Thadeus B. Culley

Name and Address:

Thadeus B. Culley  
Keyes, Fox & Wiedman LLP  
401 Harrison Oaks Blvd., Suite 100  
Cary, NC 27514

**SWORN TO AND SUBSCRIBED** before me this 8 day of June, 2015.

County of Wake )  
State of North Carolina ) **ss.**



**MY COMMISSION EXPIRES 5/6/2018**

*Kathy A. Vest.*