

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for determination of need for
Okeechobee Clean Energy Center Unit 1, by
Florida Power & Light Company.

DOCKET NO. 150196-EI

FILED: September 23, 2015

**SOUTHERN ALLIANCE FOR CLEAN ENERGY'S REQUEST FOR
REPRESENTATION BY QUALIFIED REPRESENTATIVE**

Southern Alliance for Clean Energy, pursuant to Rule 28-106.106, F.A.C., hereby requests that Gary A. Davis be named as a Qualified Representative for the purpose of representing SACE in the above-captioned docket. Mr. Davis' contact information is as follows:

Gary A. Davis
DAVIS & WHITLOCK, P.C.
21 Battery Park Ave., Suite 206
Asheville, N.C. 28801
(828) 622-0044
gadavis@enviroattorney.com

SACE is aware that it can be represented by counsel as defined in Rule 28-106.106, F.A.C., and has chosen to be represented by Mr. Davis, and his law partner, James S. Whitlock, in addition to counsel appearing on its behalf in this docket.

SACE requests that Mr. Davis be approved by the Presiding Officer as Qualified Representative based upon the attached Affidavit setting forth his qualifications, experience, and knowledge of the rules governing this proceeding and the factual and legal issues involved in the case. Mr. Davis is an attorney and member of the bar of the States of Tennessee, North Carolina, and California. He has over thirty-two years of experience in environmental and land use law. He has previously represented SACE as qualified representative before the Florida Public Services Commission in 2007, in the Nuclear Plant Cost Recovery Clause Dockets from 2009 through 2012. He has also represented SACE in proceedings before the North Carolina Utilities

Commission dealing with certificates of need for coal-fired power plants and energy efficiency and renewable energy programs.

Mr. Davis is a member of the Board of Directors of SACE, and was formerly the Environmental Policy Director for the Conservancy of Southwest Florida, in Naples, Florida, during which time he became familiar with Florida administrative procedures and Florida court rules. He has been approved as Qualified Representative in several cases before the Florida Division of Administrative Hearings.

WHEREFORE, SACE respectfully requests that the Commission grant this request and name Gary A. Davis as a qualified representative for SACE in Docket No. 150196-EI.

RESPECTFULLY SUBMITTED this 23rd day of September, 2015

/s/ George Cavros
George Cavros
Southern Alliance for Clean Energy
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334
(954) 295-5714 (tel)
(866) 924-2824 (fax)

Counsel for Petitioner
Southern Alliance for Clean Energy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 23rd day of September, 2015, to the following:

Kelly Corbari Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 KCorbari@psc.state.fl.us	William P. Cox 700 Universe Boulevard Juno Beach, FL 33408 Will.Cox@fpl.com
Patricia Christensen, Charles Rehwinkel Office of Public Counsel c/o Florida Legislature 111 West Madison Street, #812 Tallahassee, FL 32399 Christensen.patty@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us	Kenneth Hoffman Florida Power and Light 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com
Jon C. Moyle, Jr. Moyle Law Firm, PA 118 N. Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com	

/s/ George Cavros
George Cavros, Esq.

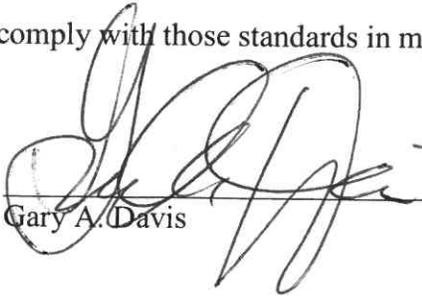
organization in two proceedings before the Florida Division of Administrative Hearings. These were *Conservancy of Southwest Florida v. Department of Community Affairs, et al.*, Case No. 03-3089GM, which closed in January 2004, and *In re Florida Power & Light Co Collier-Orange River # 3 230-KV Transmission Line Project.*, Case No. 03-1629TL, which also closed in 2004. I also completed continuing legal education courses in Florida environmental and land use law, including Environmental and Land Use Law Annual Updates.

7. Since leaving the employment of the Conservancy, I have served as Qualified Representative for the organization in three proceedings before the Division of Administrative Hearings: *Sanibel-Captiva Conservation Foundation, et al. v. South Florida Water Management District, et al.*, DOAH Case No. 06-000805, which closed in 2008; *Conservancy of Southwest Florida v. G.L. Homes Of Naples Associates II, et al.*, DOAH Case No. 06-004922, which closed in 2007; and *In re Florida Power & Light Company Glades Power Park Power Plant Siting Application*, DOAH Case No. 06-5334EPP, which closed in 2007.

8. Prior to working as an employee of the Conservancy I practiced environmental and land use law for twenty years representing clients throughout the Southeastern United States. In the practice of law I have represented clients in numerous administrative hearings dealing with environmental and land use issues and have appeared in state courts and federal courts at both the trial and appellate levels. As a result of this experience, I am familiar with administrative law and procedure, with trial procedure and with the rules of civil procedure and evidence.

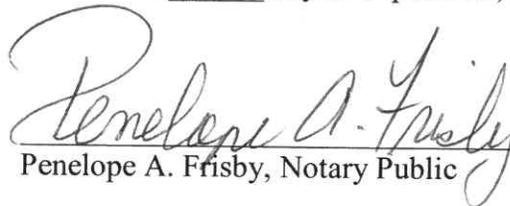
9. As a result of my experience in Florida DOAH hearings, I have gained knowledge of Florida law and rules governing jurisdiction in administrative proceedings. I have also gained knowledge of the Florida Rules of Civil Procedure and the Florida Evidence Code as they are applied in administrative proceedings.

10. I am familiar with the Standard of Conduct for Qualified Representatives and will comply with those standards in my representation. I am also familiar with the Florida Rules of Professional Conduct for attorneys and will comply with those standards in my representation.



Gary A. Davis

SWORN TO AND SUSCRIBED before me this 23rd day of September, 2015.



Penelope A. Frisby, Notary Public

My Commission Expires: 10-9-2016

