

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In Re: Applications for qualified)
representative status)
_____)
Docket No. 160008-OT
Filed: January 15, 2016

REQUEST FOR NAMING OF
QUALIFIED REPRESENTATIVE

Pursuant to Rules 28-106.106 and 28-106.107, Florida Administrative Code, White Springs Agricultural Chemicals Inc. d/b/a PCS Phosphate – White Springs (“White Springs”) requests that Laura A. Wynn, an attorney with the law firm Stone Mattheis Xenopoulos & Brew, P.C., be named a qualified representative for White Springs in Docket No. 160001-EI, In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive, Docket No. 160002-EI, In Re: Energy Conservation Cost Recovery Clause, Docket No. 160007-EI, In re: Environmental Cost Recovery Clause, Docket No. 160009-EI, In re: Nuclear Cost Recovery Clause, by Progress Energy Florida, Inc., and in all other docketed and non-docketed matters before the Commission.

1. Ms. Wynn’s business address is as follows:

Laura A. Wynn
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson St., NW, Eighth Floor, West Tower
Washington, D.C. 20007
(202) 342-0800
(202) 342-0807
law@smxblaw.com

2. Consistent with Rule 28-106.106(2)(b), White Springs is aware that it can elect to be represented solely by “counsel,” as that term is defined by Rule 28-106.106(1) of the Florida Administrative Code.

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

4. As reflected in Ms Wynn's affidavit, she: (i) is an attorney admitted to practice in the State of Virginia, (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, Ms. Wynn has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as her 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,



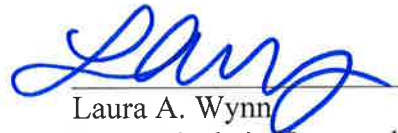
Jessica E. DeMonte
Senior Counsel
PCS Administration (USA), Inc.
Suite 400
1101 Skokie Boulevard
Northbrook, IL 60062
jessica.demonte@potashcorp.com
(847) 849-4291

January 13, 2016

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 15th day of January, 2016:

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850



Laura A. Wynn
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson St., NW
Eighth Floor, West Tower
Washington, D.C. 20007

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**In Re: Applications for qualified
representative status**

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**Docket No. 160008-OT
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AFFIDAVIT

LAURA A. WYNN, being first duly sworn, states that:

1. I am an attorney with the law firm Stone Mattheis Xenopoulos & Brew, P.C.
2. I represent White Springs Agricultural Chemicals Inc. d/b/a PCS Phosphate – White Springs (“White Springs”) in connection with certain regulatory matters relating to energy services.
3. 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 have previously requested and received qualified representative status for White Springs concerning matters before the Commission.
4. I possess the necessary qualifications to responsibly represent White Springs in all docketed and non-docketed matters before the Commission.
5. I am a member in good standing of the bar of the State of Virginia.
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.



Laura A. Wynn

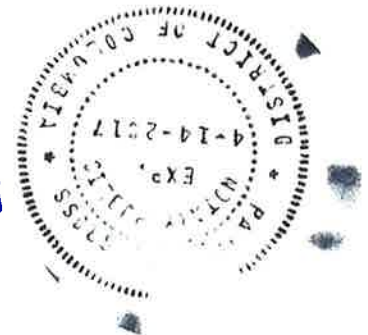
Name and address:

Laura A. Wynn
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007

SWORN TO AND SUBSCRIBED before me this 15th day of January, 2016.

District of Columbia) ss.


Notary Public
My Commission expires: 4/14/17



PAMELA G. GROSS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires April 14, 2017