FILED JAN 24, 2017 DOCUMENT NO. 00821-17 FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Applications for qualified representative status

Docket No. 170008-0T Filed: January 24, 2017

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. 170001-EI, In re: Fuel

and Purchased Power Cost Recovery Clause with Generating Performance Incentive, Docket No.

170002-EI, In Re: Energy Conservation Cost Recovery Clause, Docket No. 170007-EI, In re:

Environmental Cost Recovery Clause, Docket No. 170009-EI, In re: Nuclear Cost Recovery

Clause, 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 (fax) law@smxblaw.com

2. Consistent with Rule 28-106.1 06(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.

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

Dated: January 2017

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 24th day of January, 2017:

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

Laura A. Wynh 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

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In Re: Applications for qualified representative status

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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,

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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. Q

aura 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 day of January, 2017.

District of Columbia)

SS.

Notary Public My Commission expires: Ppol 14, 2017

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

