chargepoint.com

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ChargePoint, Inc. 254 East Hacienda Avenue | Campbell, CA 95008 USA +1.408.841.4500 or US toll-free +1.877.370.3802

September 14, 2017

Via Electronic Filing

Carlotta S. Stauffer Director, Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

# **RE: Docket No. 170008-OT: Applications for Qualified Representative Status**

Dear Ms. Stauffer:

Enclosed please find ChargePoint, Inc.'s Request to name Thadeus B. Culley as Qualified Representative, including the requisite affidavit.

Please file these documents in the above-referenced docket. Should you have any questions regarding this filing, please contact me.

Sincerely,

annexmant

Anne Smart Vice President, Public Policy

Telephone: (408) 858-5076 Email: anne.smart@chargepoint.com

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Applications for qualified representative status

DOCKET NO. 170008-OT

FILED: September 14, 2017

## CHARGEPOINT, INC.'S REQUEST FOR NAMING QUALIFIED REPRESENTATIVE THADEUS B. CULLEY

Pursuant to Rules 28-106.106 and 28-106.107, Florida Administrative Code,

ChargePoint, Inc. ("ChargePoint") respectfully requests that Thadeus B. Culley, of the law firm

Keyes & Fox LLP, be named as ChargePoint's qualified representative for all docketed and non-

docketed matters before the Florida Public Service Commission ("Commission") during 2017.

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

Thadeus B. Culley Keyes & Fox LLP 401 Harrison Oaks Blvd, Suite 100 Cary, NC 27513 Telephone: 919-825-3477 tculley@kfwlaw.com

2. Consistent with Rule 28-106.106(2)(b), ChargePoint is aware that it can elect to be represented solely by "counsel", as that term is defined in Rule 28-106.106(1).

3. ChargePoint submits that Mr. Culley possesses the requisite qualifications to responsibly represent ChargePoint'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 ChargePoint.

**WHEREFORE**, for the above and foregoing reasons, ChargePoint respectfully request that its Request for Naming Qualified Representative be granted.

Respectfully submitted this 14<sup>th</sup> day of September, 2017.

BY /s/ Anne Smart

Anne Smart Vice President, Public Policy ChargePoint, Inc. 254 East Hacienda Ave. Campbell, CA 95008 Phone: 408-858-5076 Email: anne.smart@chargepoint.com

### **CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the foregoing ChargePoint,

Inc.'s Request for Naming Qualified Representative Thadeus B. Culley to be furnished

electronically and/or by U.S. Mail to the following on this 14<sup>th</sup> day of September, 2017:

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

BY <u>/s/ Thadeus B. Culley</u>

Thadeus B. Culley Keyes & Fox LLP 401 Harrison Oaks Blvd, Suite 100 Cary, NC 27513 Telephone: 919-825-3477 tculley@kfwlaw.com

#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Applications for qualified representative status

DOCKET NO. 170008-OT

#### AFFIDAVIT

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

1. I am an attorney with the law firm Keyes & Fox LLP.

2. I represent ChargePoint, Inc. ("ChargePoint") in regulatory matters related to electric vehicle charging stations and infrastructure.

3. ChargePoint 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 of the 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 public service or utility commissions of the states of California, Louisiana, Arkansas, Mississippi, South Carolina, Oklahoma, New Hampshire, Rhode Island, Utah, and North Carolina, and the Federal Energy Regulatory Commission.

5. I have knowledge of 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 ChargePoint 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.

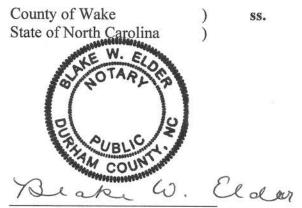
I declare that the foregoing is true and correct based on my knowledge, information, and belief.

Thadeus B. Culley

Name and Address:

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

**SWORN TO AND SUBSCRIBED** before me this  $\underline{14}^{+h}$  day of September, 2017.



Notary Public

May 16, 2021 My commission expires: