



November 8, 2017

VIA E-FILING

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

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

Dear Ms. Stauffer:

Enclosed please find the Sierra Club's Request to Name Michael Lenoff as Qualified Representative, including the requisite affidavit and certificate of good standing. Please file these in the above-referenced docket. Should you have any questions regarding this filing, please contact me.

Sincerely,

/s/ Nahaliel Kanfer
Nahaliel "Nachy" Kanfer
Deputy Director, East
Beyond Coal Campaign, Sierra Club
2331 Victory Parkway #401
Cincinnati, OH 45206
(202) 675-6691
Nachy.Kanfer@sierraclub.org

Enc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for Qualified Representative Status) DOCKET No. 170008-OT
)
_____) Filed: November 8, 2017

**REQUEST TO NAME MICHAEL LENOFF AS
QUALIFIED REPRESENTATIVE**

Pursuant to Rule 28-106.107, Florida Administrative Code, Sierra Club requests that Michael Lenoff, Legal Fellow, be named as Sierra Club’s qualified representative for all docketed and non-docketed matters currently before the Commission, for any new matters opened in Calendar Year 2017, and for such additional period as the Commission may authorize. Sierra Club is aware that it can be represented by counsel as defined in Rule 28-106.106, Florida Administrative Code, and has chosen otherwise.

Enclosed with this request is a sworn affidavit setting forth Mr. Lenoff’s qualifications. His business address is 50 F Street NW, 8th Floor, Washington, DC 20001, telephone number (202) 650-6065.

WHEREFORE, Sierra Club asks that the Florida Public Service Commission grant this request.

Respectfully submitted,

/s/ Nahaliel Kanfer
Nahaliel “Nachy” Kanfer
Deputy Director, East
Beyond Coal Campaign, Sierra Club
2331 Victory Parkway #401
Cincinnati, OH 45206
(202) 675-6691
Nachy.Kanfer@sierraclub.org

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true copy and correct copy of the foregoing was furnished via email and U.S. Mail to the following party on this 8th day of November 2017.

Keith Hetrick
General Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

/s/ Julie Kaplan

Julie Kaplan
Senior Attorney
Sierra Club Environmental Law Program
50 F Street NW, 8th Floor
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(202) 548-4592 (direct)
(202) 547-6009 (fax)
Julie.Kaplan@sierraclub.org

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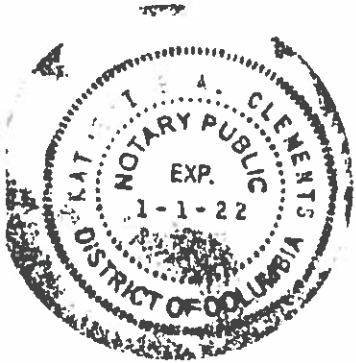
AFFIDAVIT

Undersigned counsel, being first duly sworn, states that:

Undersigned counsel is currently a legal fellow of the Sierra Club at the address and telephone number below.

Undersigned counsel possesses the necessary qualifications to responsibly represent Sierra Club's interest in all docketed and non-docketed matters before the Florida Public Service Commission.

Undersigned counsel is a recent graduate of New York University School of Law in the process of applying for admission to the bar of New York. He passed the bar exam in New York administered on July 25-26, 2017. He has knowledge of: the Florida Statutes relative to the Florida Public Service Commission's jurisdiction; the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding. He also has knowledge of the factual and legal issues in the proceedings in which he will represent Sierra Club's interest, including the proceeding in Docket No. 20170225-EI. He further has knowledge of, and is in compliance with, the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.



Michael Lenoff
Legal Fellow
Sierra Club
50 F St. NW, 8th Floor
Washington, DC 20001
202-650-6065 (direct)
michael.lenoff@sierraclub.org

Affirmed and subscribed before me this 8th day of November, 2017.

KATHERINE A. CLEMENTS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires January 1, 2022

Notary Public