

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for Qualified Representative ) Docket No. 20220008-OT  
Status )  
\_\_\_\_\_ ) Date Filed: January 3, 2022

**REQUEST FOR NAMING OF CHRISTOPHER T. WRIGHT AS  
QUALIFIED REPRESENTATIVE**

Pursuant to Rule 28-106.107, Florida Administrative Code, Pivotal Utility Holdings, Inc. d/b/a Florida City Gas (“Florida City Gas”) requests that Christopher T. Wright, Senior Attorney - Regulatory, be named a qualified representative of Florida City Gas as previously approved in Order No. PSC-2021-0015-FOF-OT for all docketed and non-docketed matters currently before the Commission and for any new matters in Calendar Year 2022 or such additional period as the Commission may authorize. Florida City Gas is aware that it can be represented by counsel as defined in Rule 28-106.106, Florida Administrative Code and may also elect such representation.

Attached hereto is a declaration setting forth Mr. Wright’s qualifications. Mr. Wright’s business address is 700 Universe Boulevard, Juno Beach, FL 33408, telephone number (561) 691-7144.

**WHEREFORE**, for the above and foregoing reasons, Florida City Gas respectfully requests that its Application for Qualified Representative Status be granted.

Respectfully submitted,

By: /s/ Kenneth Rubin  
Kenneth M. Rubin  
Assistant General Counsel  
Florida Power & Light Company  
Florida City Gas  
700 Universe Boulevard  
P.O Box 14000  
Juno Beach, Florida 33408  
Telephone (561) 691-2512  
Email: [Ken.Rubin@fpl.com](mailto:Ken.Rubin@fpl.com)  
Fla. Bar. No. 349038

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Naming of Christopher T. Wright as Qualified Representative has been furnished by electronic mail to the following parties on this 3rd day of January 2022

*Julie Phillips (JPHILLIP@PSC.STATE.FL.US)*

*Samantha Cibula (scibula@psc.state.fl.us)*

By: /s/ Kenneth Rubin  
Kenneth M. Rubin  
Assistant General Counsel  
Florida Power & Light Company  
Florida City Gas  
700 Universe Boulevard  
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Fla. Bar. No. 349038

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In re: Application for Qualified Representative  
Status

Docket No: 20220008-OT

**DECLARATION OF CHRISTOPHER T. WRIGHT**

1. My name is Christopher T. Wright. I am employed by Florida Power & Light Company as Senior Attorney – Regulatory, and authorized to represent its wholly-owned subsidiary **Pivotal Utility Holdings, Inc. d/b/a Florida City Gas** (“**Florida City Gas**”). My business address and telephone numbers are as follows:

Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
Telephone: (561) 691-7144  
Facsimile: (561) 691-7135

2. I have personal knowledge of the matters stated in this Affidavit.

3. I am an attorney admitted to practice law and in good standing in the State of Pennsylvania since 2006. From 2008 to 2018, I represented natural gas, electric, and water utility clients in state regulatory proceedings before the Pennsylvania Public Utility Commission and Pennsylvania appellate courts. My work included the litigation of a wide-variety of regulatory matters, including rate proceedings, mergers and acquisitions, energy procurement, renewable energy and net metering matters, a variety of consumer complaint cases, regulatory audits and investigations, right-to-know law cases, and other matters before state regulatory agencies and appellate courts.

4. I was approved as a qualified representative and authorized to represent the interests of Florida City Gas by Order No. PSC-2018-0440-FOF-OT issued August 29, 2018. Since that time, I have served as Florida Authorized House Counsel and represented Florida City Gas before

the Florida Public Service Commission, which has jurisdiction with respect to natural gas and other utilities in the State of Florida. My work includes representing Florida City Gas in general rate proceedings, gas procurement adjustment proceedings, reconcilable clause proceedings, petitions for financing authority, rulemakings, and other natural gas utility matters.


5. I have experience and am familiar with the Florida Statutes relating to the jurisdiction of the Florida Public Service Commission, and the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding. I also have experience and am familiar with portions of the Florida Administrative Code and Florida Statutes relative to the rules of evidence.

6. I have been certified by the Supreme Court of Florida as “Authorized House Counsel” pursuant to Chapter 17 of the Rules Regulating the Florida Bar. Accordingly, I am subject to the Rules Regulating the Florida Bar and to the jurisdiction of the Supreme Court of Florida for disciplinary purposes.

7. I have reviewed Rule 28-106.107 of the Florida Administrative Code and agree to abide by its standards.

8. Consistent with the standard set forth in Rule 28-106.107, I have acquired or will acquire knowledge of the factual and legal issues involved insofar as my representation of Florida City Gas is concerned in proceedings before this Commission.

9. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

  
\_\_\_\_\_  
Christopher T. Wright  
Authorized House Counsel No. 1007055

DATE: January 3, 2022