

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Applications for qualified )  
representative status )  
\_\_\_\_\_ )  
Docket No. 20240008-OT  
Filed: February 2, 2024

**REQUEST FOR NAMING OF QUALIFIED REPRESENTATIVE**

Pursuant to Rules 28-106.106 and 28-106.107, Florida Administrative Code, Nucor Steel Florida, Inc. (“Nucor”) requests that Michael K. Lavanga, an attorney with the law firm Stone Mattheis Xenopoulos & Brew, PC, be named a qualified representative for Nucor in all docketed and non-docketed matters before the Commission.

1. Mr. Lavanga’s business address is as follows:

Michael K. Lavanga, Esq.  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St., NW  
Suite 800 West  
Washington, DC 20007  
(202) 342-0800  
(202) 342-0807 (fax)  
[mkl@smxblaw.com](mailto:mkl@smxblaw.com)

2. Consistent with Rule 28-106.106(2)(a), F.A.C., Nucor 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. Nucor submits that Mr. Lavanga possesses the necessary qualifications to responsibly represent Nucor in matters before the Commission. Mr. Lavanga's qualifications are set forth in the attached affidavit.

4. As reflected in Mr. Lavanga's affidavit, he: (i) is an attorney admitted to practice in the State of Virginia and the District of Columbia, (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 28-106.106, F.A.C., Mr. Lavanga has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Nucor is concerned in matters before the Commission.

Respectfully submitted,



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Corey Allain  
Controller  
Nucor Steel Florida, Inc.  
22 Nucor Drive  
Frostproof, FL 33843  
[corey.allain@nucor.com](mailto:corey.allain@nucor.com)  
843-546-5777

## 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 2nd day of February, 2024

Florida Power & Light Company  
John T. Burnett  
700 Universe Boulevard  
Juno Beach FL 33408  
[john.t.burnett@fpl.com](mailto:john.t.burnett@fpl.com)

Florida Power & Light Company  
Christopher T. Wright  
700 Universe Boulevard  
Juno Beach FL 33408-0420  
[Christopher.Wright@fpl.com](mailto:Christopher.Wright@fpl.com)

PCS Phosphate - White Springs  
James W. Brew  
Laura W. Baker  
Sarah B. Newman  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St., NW  
Washington DC 20007  
[jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)  
[lwb@smxblaw.com](mailto:lwb@smxblaw.com)  
[sbn@smxblaw.com](mailto:sbn@smxblaw.com)

/s/ Michael K. Lavanga  
Michael K. Lavanga, Esq.  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St., NW  
Suite 800 West  
Washington, DC 20007  
[mkl@smxblaw.com](mailto:mkl@smxblaw.com)

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**AFFIDAVIT**

Michael K. Lavanga, being first duly sworn, states that:

1. I am an attorney with the law firm Stone Mattheis Xenopoulos & Brew, PC.
2. I represent Nucor Steel Florida, Inc. (“Nucor”) in connection with certain regulatory matters relating to energy services.
3. I have prepared this affidavit in connection with Nucor’s request that I be named a qualified representative of Nucor in all docketed and non-docketed matters before the Florida Public Service Commission (“Commission”). I have previously requested and received qualified representative status for Nucor concerning matters before the Commission.
4. I possess the necessary qualifications to responsibly represent Nucor in all docketed and non-docketed matters before the Commission.
5. I am a member in good standing of the bars of Virginia and the District of Columbia and have appeared before utility regulatory agencies and authorities, including the Public Service Commissions of Missouri, Ohio, and South Carolina, and the Federal Energy Regulatory Commission.
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; and 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 involved insofar as my representation of Nucor is concerned in proceedings before this Commission. I 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.

  
\_\_\_\_\_

Michael K. Lavanga

Name and address:

Michael K. Lavanga, Esq.  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St., NW  
Suite 800 West  
Washington, DC 20007

SWORN TO AND SUBSCRIBED before me this 29<sup>th</sup> day of January, 2024

District of Columbia ) ss.

  
\_\_\_\_\_

Notary Public  
My Commission expires: April 14, 2027



PAMELA G. GROSS  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires April 14, 2027