

Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33408-0420 Law Department

John T. Butler Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 304-5639 (561) 691-7135 (Facsimile)

December 12, 2008

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# VIA OVERNIGHT MAIL

Ms. Anne Cole, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center, Room 110
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Florida Power & Light Company's Request for Naming of Qualified Representative

Docket No. 080008-OT

Dear Ms. Cole:

I enclose and hand you herewith for filing the original and seven (7) copies of Florida Power & Light Company's ("FPL") Request for Naming of Carla G. Pettus as Qualified Representative to be filed in the above-referenced docket.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter. Also included herewith is a CD containing FPL's Request in Word. Please contact me should you or your Staff have any questions regarding this filing.

Sincerely

JTB:aal Enclosures ECR THOO OPC

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CLK Kim Pera

John T. Butler

DOCUMENT NUMBER-DATE

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for qualified representative	)	Docket No. 080008-OT
status	)	
	)	Date Filed: December 15, 2008

# REQUEST FOR NAMING OF CARLA G. PETTUS AS **QUALIFIED REPRESENTATIVE**

Pursuant to Rule 28-106.107, Florida Administrative Code, Florida Power & Light Company ("FPL") requests that Carla G. Pettus, Senior Attorney, be named a qualified representative of FPL in all docketed and non-docketed matters currently before the Commission and in any new matters in calendar year 2009 or such additional period as the Commission may authorize. FPL filed a request on July 16, 2008 to have Ms. Pettus named a qualified representative for calendar year 2008, but it does not appear that an order has been issued on that request at this time. FPL 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 sworn affidavit setting forth Ms. Pettus' qualifications. Ms. Pettus' business address is 700 Universe Boulevard, Juno Beach, FL 33418, telephone number (561) 691-7207.

WHEREFORE, for the above and foregoing reasons, Florida Power & Light Company respectfully requests that its Request for Naming of Qualified Representative be granted.

Respectfully submitted

John/Γ. Butler nor Attorney

Florida Bar No.283479

Florida Power & Light Company

700 Universe Boulevard

Juno Beach, Florida 33408-0420

Tel: (561) 304-5639

(561) 691-7135 DOCUMENT NUMBER-DATE Fax:

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Naming of Carla G. Pettus as Qualified Representative has been furnished by U.S. Mail to the following parties on this 15th day of December, 2008.

Michael G. Cooke General Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

By:

John 7. Butler Semor Attorney

Plorida Power & Light Company

700 Universe Boulevard

Juno Beach, Florida 33408-0420

Tel: (561) 304-5639

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for qualified re Status	epresentativ	e ) Docket No. 0800( ) )	08-OT
ΓΑΤΕ OF FLORIDA	)		
COUNTY OF PALM BEACH	)	AFFIDAVIT OF CARLA G. F	ETTUS

**BEFORE ME,** the undersigned authority, personally appeared Carla G. Pettus who, being first duly sworn, did depose and say:

1. My name is Carla G. Pettus. I am currently employed by Florida Power & Light Company ("FPL") as Senior Attorney. My business address and telephone number are as follows:

700 Universe Boulevard Juno Beach, Florida 33408-0420 (561) 691-7207 (561) 691-7135 (facsimile)

- 2. I have personal knowledge of the matters stated in this affidavit.
- 3. I am an attorney, admitted to the practice of law in the State of Maryland and the District of Columbia. I have practiced extensively before the Maryland Public Service Commission and the Public Service Commission of the District of Columbia, in matters relating to regulation of utilities. Representing the Maryland Public Service Commission, the Maryland Public Service Commission's staff, a regional transmission organization PJM Interconnection, LLC, and a competitive retail electricity supplier, I have made appearances and participated in numerous proceedings. Such proceedings include general rate cases, fuel

clause adjustment proceedings, petitions for certificates of public convenience and necessity for the construction of generating plants, transmission siting proceedings, affiliate transactions and code of conduct rulemakings, and renewable energy portfolio standards rulemakings. I also have made appearances or participated in rulemaking and other proceedings before the Delaware Public Service Commission, and the Federal Energy Regulatory Commission.

- 4. I have reviewed portions of the Florida Statutes relating to jurisdiction of the Florida Public Service Commission, and the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding. I also have reviewed portions of the Florida Administrative Code and Florida Statutes relative to procedure in administrative proceedings and the rules of evidence, including the concept of hearsay in an administrative proceeding. The foregoing rules and statutory provisions generally are consistent with those with which I have experience and am familiar.
- 5. 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.
- 6. I have reviewed Rule 28-106.107 of the Florida Administrative Code and agree to abide by its standards.

- 7. 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 Power & Light Company is concerned in proceedings before this Commission.
  - 8. Affiant says nothing further.

Carla G. Pettus

SUBSCRIBED AND SWORN TO before me this 12th day of December, 2008, by Carla G.

Pettus, who is personally known to me, and who did take an oath.

Notary Public, State of Florida

My Commission Expires: 5-11-12

AMY LOWE Commission DD 782917 Expires May 11, 2012 Bonded Thru Trey Falls Insurance ACO-365-7019