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09 DEC 29 PM 4:49
COMMISSION
CLERK

December 29, 2009

VIA HAND DELIVERY

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 090008-OT

Dear Ms. Cole:

Enclosed for filing, please find the original and seven (7) copies of Florida City Gas's Request for Qualified Representative Status for Shannon O. Pierce together with a CD containing the same in PDF format.

Thank you for your assistance with this filing. Please do not hesitate to contact me if you

COM ___ have any questions.

APA ___

ECR ___

GCL ± CD

RAD ___

SSC ___

ADM ___

OPC ___

CLK ___ Enclosures

Sincerely,



Matthew Feil

cc: Curt Kiser (PSC)

{TL212302;1}

DOCUMENT NUMBER-DATE

12248 DEC 29 8

FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for Qualified)
Representative Status)
_____)

Docket No. 090008-OT
Filed: December 29, 2009

**FLORIDA CITY GAS'S REQUEST FOR
QUALIFIED REPRESENTATIVE STATUS**


Pursuant to Rule 28-106.106, Florida Administrative Code, Florida City Gas ("FCG" or "Company"), an operating division of Pivotal Utility Holdings, Inc., respectfully requests that Shannon O. Pierce, Esquire, attorney and Senior Regulatory Counsel for AGL Resources Inc. (ultimate parent company to Pivotal Utility Holdings, Inc.) be named as a qualified representative authorized to appear on behalf of FCG in all docketed matters and non-docketed matters currently before the Commission, including but not limited to Docket No. 090539-GU, and any new matters arising in 2010 or for such additional period of time as the Commission may authorize. In accordance with the referenced Rule, FCG affirms that it is aware of its right to be represented by counsel that is a member of the Florida Bar, and that it is fully cognizant of the services that Shannon O. Pierce can provide.

Attached hereto is the sworn Affidavit of Shannon O. Pierce, setting forth her qualifications as required by Rule 28-106.106, Florida Administrative Code. Ms. Pierce's address is: AGL Resources, Inc., Ten Peachtree Place, 15th Floor, Atlanta, GA 30309, (404) 584-3394.

Florida City Gas
Request for Qualified Representative Status
December 29, 2009

WHEREFORE, for the foregoing reasons, Florida City Gas respectfully requests that its Request for Qualified Representative Status be granted.

Respectfully submitted,

By: 

Matthew Feil
AKERMAN SENTERFITT
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
(850) 425-1614
(850) 222-0103
matt.feil@akerman.com

On behalf of Florida City Gas

.. Florida City Gas
Request for Qualified Representative Status
December 29, 2009

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via
via US Mail or Hand Delivery to the persons listed below this 29th day of December, 2009:

Curt Kiser
General Counsel
Florida Public Service Commission,
Office of the General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

By: 

Matthew Feil
AKERMAN SENTERFITT
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
(850) 425-1614
(850) 222-0103
matt.feil@akerman.com

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for Qualified)
Representative Status)
_____)

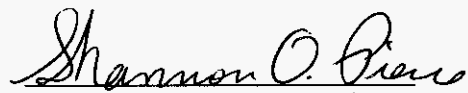
Docket No. 090008-OT
Filed: December 29, 2009

AFFIDAVIT OF SHANNON O. PIERCE

State of Georgia)
County of Fulton)

I, Shannon O. Pierce, being first duly sworn, do hereby affirm and attest as follows:

1. I am an attorney with the title of Senior Regulatory Counsel for AGL Resources Inc. AGL Resources Inc. is the parent of Pivotal Utility Holdings, Inc., ("Pivotal") and Florida City Gas ("FCG" or "Company") is an operating division of Pivotal. My business address and telephone number are: Ten Peachtree Place, 15th Floor, Atlanta, GA 30309, (404) 584-3394.
2. I am a member of good standing of the Bar of the Commonwealth of Virginia, and am seeking qualified representative status to appear on behalf of FCG before the Florida Public Service Commission.
3. I have extensive commercial, regulatory, and natural gas-specific contract and regulatory experience and have appeared in matters before federal and state regulatory commissions.
4. I am familiar with 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 am also familiar with those portions of the Florida Statutes and the Florida Administrative Code relative to rules of evidence in administrative proceedings, including the concept of hearsay in an administrative proceeding.
5. I have obtained or will obtain knowledge of the factual and legal issues involved in the proceedings in which I am involved or may become involved.
6. I have reviewed Rule 28.106.107, Florida Administrative Code, and agree to abide by its standards.
7. The foregoing statements are true and correct to the fullest extent of my knowledge and belief.


Shannon O. Pierce, Esquire

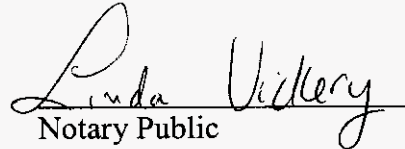
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FPSC-COMMISSION CLERK

BEFORE ME, the undersigned authority, personally appeared Shannon O. Pierce, who is personally known by me or who has produced a Georgia State Driver's License as identification and did execute the foregoing.

SWORN TO AND SUBSCRIBED before me this 28th day of Dec, 2009.


Notary Public

Typed, Printed, or Stamped Name

My Commission Expires: _____

Linda A. Vickery
Notary Public Gwinnett Co., Georgia
My Commission Expires March 13th, 2010