### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for determination of need for Okeechobee Clean Energy Center Unit 1, by Florida Power & Light Company.

DOCKET NO. 150196-EI

FILED: September 23, 2015

# SOUTHERN ALLIANCE FOR CLEAN ENERGY'S REQUEST FOR REPRESENTATION BY QUALIFIED REPRESENTATIVE

Southern Alliance for Clean Energy, pursuant to Rule 28-106.106, F.A.C., hereby requests that James S. Whitlock be named as a Qualified Representative for the purpose of representing SACE in the above-captioned docket. Mr. Whitlock's contact information is as follows:

James S. Whitlock
DAVIS & WHITLOCK, P.C.
21 Battery Park Ave., Suite 206
Asheville, N.C. 28801
(828) 622-0044
jwhitlock@enviroattorney.com

SACE is aware that it can be represented by counsel as defined in Rule 28-106.106, F.A.C., and has chosen to be represented by Mr. Whitlock, and his law partner, Gary A. Davis, in addition to counsel appearing on its behalf in this docket.

SACE requests that Mr. Whitlock be approved by the Presiding Officer as Qualified Representative based upon the attached Affidavit setting forth his qualifications, experience, and knowledge of the rules governing this proceeding and the factual and legal issues involved in the case. Mr. Whitlock is an attorney and member of the bar of the State of North Carolina. He has over ten years of experience in environmental and land use law. He has previously represented SACE as qualified representative before the Florida Public Services Commission in the Nuclear Plant Cost Recovery Clause Dockets from 2009 through 2012.

WHEREFORE, SACE respectfully requests that the Commission grant this request and name James S. Whitlock as a qualified representative for SACE in Docket No. 150196-EI.

RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of September, 2015

/s/ George Cavros
George Cavros
Southern Alliance for Clean Energy
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334
(954) 295-5714 (tel)
(866) 924-2824 (fax)

Counsel for Petitioner Southern Alliance for Clean Energy

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this  $23^{rd}$  day of September, 2015, to the following:

Kelly Corbari Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 KCorbari@psc.state.fl.us	William P. Cox 700 Universe Boulevard Juno Beach, FL 33408 Will.Cox@fpl.com
Patricia Christensen, Charles Rehwinkel Office of Public Counsel c/o Florida Legislature 111 West Madison Street, #812 Tallahassee, FL 32399 Christensen.patty@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us	Kenneth Hoffman Florida Power and Light 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com
Jon C. Moyle, Jr. Moyle Law Firm, PA 118 N. Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com	

/s/ George Cavros
George Cavros, Esq.

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COUNTY OF MADISON	)
	)
STATE OF NORTH CAROLINA	)

## AFFIDAVIT OF JAMES S. WHITLOCK

- I am making this Affidavit in support of the request of the Southern Alliance for Clean Energy ("SACE") to designate me as qualified representative in the above-captioned matter.
- 2. I am familiar with the issues that SACE has raised in its Petition to Intervene in this case.
- I am currently engaged in the practice of law specializing in environmental law and land use law.
- 4. I am a member in good standing of the bar of the state of North Carolina. I am not a member of the bar of the State of Florida.
- 5. I was previously granted Qualified Representative status before the Florida Public Service Commission on behalf of SACE in *In re: Nuclear Plant Cost Recovery Clause*, Docket Nos. 090009-EI, 100009-EI, 110009-EI, and 120009-EI.
- 6. As a result of my experience in the above dockets, I have gained knowledge of Florida law and rules governing jurisdiction in administrative proceedings. I have also gained knowledge of the Florida Rules of Civil Procedure and the Florida Evidence Code as they are applied in administrative proceedings.

7. I am familiar with the Standard of Conduct for Qualified Representatives and will comply with those standards in my representation. I am also familiar with the Florida Rules of Professional Conduct for attorneys and will comply with those standards in my representation.

James S. Whitlock

SWORN TO AND SUSCRIBED before me this 33kd day of September, 2015.

Penelope A. Frisby, Notary Public

My Commission Expires: 16-9-2016

