

January 22, 2018

VIA E-FILING

Carlotta S. Stauffer Director, Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

RE: Docket No. 180008-OT: Applications for Qualified Representative Status

Dear Ms. Stauffer:

Enclosed please find a renewal of the Sierra Club's Request to Name Michael Lenoff as Qualified Representative, including the requisite affidavit and certificate of good standing. Please file these in the above-referenced docket. Should you have any questions regarding this filing, please contact me.

Sincerely,

<u>/s/ Nahaliel Kanfer</u> Nahaliel "Nachy" Kanfer Deputy Director, East Beyond Coal Campaign, Sierra Club 2331 Victory Parkway #401 Cincinnati, OH 45206 (202) 675-6691 Nachy.Kanfer@sierraclub.org

Enc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for Qualified Representative Status))

DOCKET No. 180008-OT Filed: January 22, 2018

REQUEST TO NAME MICHAEL LENOFF AS QUALIFIED REPRESENTATIVE

Pursuant to Rule 28-106.107, Florida Administrative Code, Sierra Club requests that Michael Lenoff, Legal Fellow, be named as Sierra Club's qualified representative for all docketed and non-docketed matters currently before the Commission, for any new matters opened in Calendar Year 2018, and for such additional period as the Commission may authorize. He had previously secured qualified representative status for the Calendar Year 2017. Sierra Club is aware that it can be represented by counsel as defined in Rule 28-106.106, Florida Administrative Code, and has chosen otherwise.

Enclosed with this request is a sworn affidavit setting forth Mr. Lenoff's qualifications. His business address is 50 F Street NW, 8th Floor, Washington, DC 20001, telephone number (202) 650-6065.

WHEREFORE, Sierra Club asks that the Florida Public Service Commission grant this request.

Respectfully submitted,

/s/ Nahaliel Kanfer Nahaliel "Nachy" Kanfer Deputy Director, East Beyond Coal Campaign, Sierra Club 2331 Victory Parkway #401 Cincinnati, OH 45206 (202) 675-6691 Nachy.Kanfer@sierraclub.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was

furnished via electronic mail to the following party on this 22nd day of January, 2018.

Keith Hetrick General Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

/s/ Julie Kaplan

Julie Kaplan Senior Attorney Sierra Club Environmental Law Program 50 F Street NW, 8th Floor Washington, D.C. 20001 (202) 548-4592 (direct) (202) 547-6009 (fax) Julie.Kaplan@sierraclub.org

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for Qualified Representative Status)

DOCKET No. 180008-OT

Filed: Jan. 22nd 2018

AFFIDAVIT

Undersigned counsel, who personally appeared before me, produced driver's litense as identification, being duly sworn, states that:

Undersigned counsel is currently a legal fellow of the Sierra Club at the address and telephone number below.

Undersigned counsel possesses the necessary qualifications to responsibly represent Sierra Club's interest in all docketed and non-docketed matters before the Florida Public Service Commission.

Undersigned counsel is a recent graduate of New York University School of Law in the process of applying for admission to the bar of New York. He passed the bar exam in New York administered on July 25-26, 2017. He has knowledge of: the Florida Statutes relative to the Florida Public Service Commission's jurisdiction; the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding. He also has knowledge of the factual and legal issues in the proceedings in which he will represent Sierra Club's interest, including the proceeding in Docket No. 20170225-EI. He further has knowledge of, and is in compliance with, the Standards of Conduct for Qualified Representatives contained in Rule 28-106.107 of the Florida Administrative Code.

> Michael Lenoff Legal Fellow Sierra Club 50 F St. NW, 8th Floor Washington, DC 20001 202-650-6065 (direct) michael.lenoff@sierraclub.org

Affirmed and subscribed before me this 22^{nd} day of $\sqrt{a_{max}}$, 2018.

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TESS FIELDS NOTARY PUBLIC DISTRICT OF COLUMBIA My Commission Expires January 14, 2023

Notary Public