

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: August 28, 2018
TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Samantha Cibula, Office of the General Counsel *S.M.C.*
RE: Docket No. 20180008-OT

Please file the attached materials in the docket file listed above.

Thank you.

Attachment

RECEIVED-FPSC
2018 AUG 29 AM 8:04
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20180008-0T

Date Filed: August 23, 2018

**REQUEST FOR NAMING OF CHRISTOPHER T. WRIGHT AS
QUALIFIED REPRESENTATIVE**

Pursuant to Rule 28-106.107, Florida Administrative Code, Pivotal Utility Holdings, Inc. d/b/a Florida City Gas ("Florida City Gas") requests that Christopher T. Wright, Senior Attorney - Regulatory, be named a qualified representative of Florida City Gas for all docketed and non-docketed matters currently before the Commission and for any new matters in Calendar Year 2018 or such additional period as the Commission may authorize. Florida City Gas 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 Mr. Wright's qualifications. Mr. Wright's business address is 700 Universe Boulevard, Juno Beach, FL 33408, telephone number (561) 691-7144.

WHEREFORE, for the above and foregoing reasons, Florida City Gas respectfully requests that its Request for Naming of Qualified Representative be granted.

Respectfully submitted,

By: /s/ R. Wade Litchfield
R. Wade Litchfield
Vice President & General Counsel
Florida Power & Light Company
Florida City Gas
700 Universe Boulevard
P.O Box 14000
Juno Beach, Florida 33408
Telephone (561) 691-7101



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Naming of Christopher T. Wright as Qualified Representative has been furnished by U.S. Mail to the following parties on this 23rd day of August, 2018.

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

By: /s/ R. Wade Litchfield
R. Wade Litchfield
Vice President & General Counsel
Florida Power & Light Company
Florida City Gas
700 Universe Boulevard
P.O Box 14000
Juno Beach, Florida 33408
Telephone (561) 691-7101

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20180008-OT

Date Filed: August 23, 2018

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

AFFIDAVIT OF CHRISTOPHER T. WRIGHT

BEFORE ME, the undersigned authority, personally appeared Christopher T. Wright who, being first duly sworn, did depose and say:

1. My name is Christopher T. Wright. I am employed by Pivotal Utility Holdings, Inc. d/b/a Florida City Gas (“Florida City Gas”) as Senior Attorney - Regulatory. My business address and telephone numbers are as follows:

Florida City Gas
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Telephone: (561) 691-7144
Facsimile: (561) 691-7135

2. I have personal knowledge of the matters stated in this Affidavit.

3. I am an attorney admitted to practice law and in good standing in the State of Pennsylvania since 2006. From 2008 to 2018, I represented natural gas, electric, and water utility clients in state regulatory proceedings before the Pennsylvania Public Utility Commission and Pennsylvania appellate courts. My work included the litigation of a wide-variety of regulatory matters, including rate proceedings, mergers and acquisitions, energy procurement, renewable energy and net metering matters, a variety of consumer complaint cases, regulatory audits and

investigations, right-to-know law cases, and other matters before state regulatory agencies and appellate courts.

4. Since 2018, I have served as Florida Authorized House Counsel and will represent Florida City Gas before the Florida Public Service Commission, which has jurisdiction with respect to natural gas and other utilities in the State of Florida. My work will include representing Florida City Gas in general rate proceedings, gas procurement adjustment proceedings, reconcilable clause proceedings, petitions for financing authority, rulemakings, and other natural gas utility matters.

5. I have experience and am familiar with the Florida Statutes relating to the jurisdiction of the Florida Public Service Commission, and the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding. I also have experience and am familiar with portions of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding.

6. 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.

7. I have reviewed Rule 28-106.107 of the Florida Administrative Code and agree to abide by its standards.

8. 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 City Gas is concerned in proceedings before this Commission.

9. Affiant says nothing further.



Christopher T. Wright
Authorized House Counsel No. 1007055

SUBSCRIBED AND SWORN TO before me this 22nd day of August 2018, by
Christopher T. Wright, who is personally known to me, and who did take an oath.





Notary Public, State of Florida

My Commission Expires: _____