

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of)

Lee County Electric Cooperative, Inc.)

v.)

Seminole Electric Cooperative, Inc.)

Docket No. 981827-EC

**REQUEST FOR ORDER GRANTING LEAVE FOR
APPEARANCE OF QUALIFIED REPRESENTATIVE**

COMES NOW the Petitioner, Lee County Electric Cooperative, Inc. ("LCEC"), by and through its undersigned counsel of record, John A. Noland of the law firm of Henderson, Franklin, Starnes & Holt, P.A., and pursuant to Rule 28-106.106, Florida Administrative Code, hereby gives notice of sponsorship and requests certification by the Florida Public Service Commission ("Commission") of Donald L. Howell and Kathleen C. Lake, of the law firm of Vinson & Elkins, L.L.P. as qualified representatives and in support thereof states as follows:

- 1. Petitioner LCEC seeks certification pursuant to Rule 28-106.106, F.A.C.

Mr. Howell and Ms. Lake are admitted to practice before the Bar of Texas, and specialize in utility and energy regulation law. Each has extensive experience appearing before federal and state agencies. Vinson & Elkins, L.L.P. is located at 2300 First City Tower, 1001 Fannin, Houston, Texas, 77002-6760. The Vinson & Elkins office telephone number is 713-758-2222.

- 2. Pursuant to Rule 28-106.106, F.A.C., Petitioner hereby states that it is aware of the services that Mr. Howell and Ms. Lake of the law firm Vinson & Elkins, L.L.P. can provide.

Further, Petitioner is aware that it has a right to be represented by an attorney at its own expense.

DOCUMENT NUMBER-DATE

13860 DEC-98

FPSC-RECORDS/REPORTING

Based on full consideration of its rights, Petitioner hereby requests that the Commission certify Mr. Howell and Ms. Lake so that they may serve as co-counsel on behalf of Petitioner, Lee County Electric Cooperative, Inc.

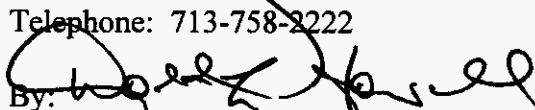
3. Pursuant to Rule 28-106.106, F.A.C., Mr. Howell and Ms. Lake each affirm that he and she is qualified in light of the nature of the proceedings and the applicable law. Mr. Howell and Ms. Lake each affirm that he and she has knowledge of jurisdiction; knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings; knowledge regarding the Rules of Evidence, including the concept of hearsay in administrative proceedings; knowledge regarding the factual and legal issues involved in the proceedings; and knowledge of, and compliance with, the standards of conduct for qualified representatives, Rule 28-106.107, F.A.C.

RELIEF REQUESTED

WHEREFORE, Petitioner, Lee County Electric Cooperative, Inc., respectively requests that the Commission determine that Mr. Howell and Ms. Lake of the law firm of Vinson & Elkins, L.L.P. are qualified representatives under Rule 28-106.106, F.A.C., and that they are authorized to practice before the Commission in this proceeding.


Respectfully submitted this 8th day of December, 1998.

Vinson & Elkins, L.L.P.
2300 First City Tower
1001 Fannin
Houston, Texas 77002-6760
Telephone: 713-758-2222

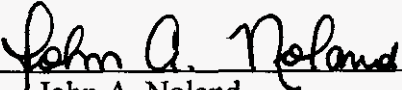
By: 

Donald L. Howell
Member, Texas Bar

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By: 
Kathleen Lake
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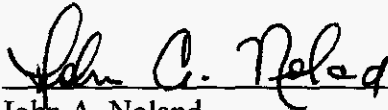
Henderson, Franklin, Starnes & Holt, P.A.
1715 Monroe Street
P.O. Box 280
Fort Myers, FL 33902-0280
Telephone: 941-334-4121

By: 
John A. Noland
Florida Bar No. 175179

ATTORNEYS FOR LEE COUNTY ELECTRIC
COOPERATIVE, INC.

CERTIFICATE OF SERVICE

I certify that a copy hereof has been furnished to Richard J. Midulla, Executive Vice
President and General Manager, Seminole Electric Cooperative, Inc., P.O. Box 272000, Tampa,
FL 33688-2000, by regular U.S. Mail this 8th day of December, 1998.



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