

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Qualified Representative)
Status.)

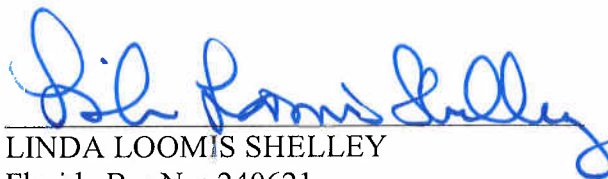
DOCKET NO. 140008-OT
Filed: July 16, 2014

**REQUEST BY EFS SHADY HILLS LLC FOR ALAN M. SELTZER AND
JOHN F. POVILAITIS TO APPEAR AS QUALIFIED REPRESENTATIVES**

EFS Shady Hills LLC, by and through its undersigned counsel, and pursuant to Rule 28-106.106, F.A.C., hereby requests that Alan M. Seltzer, Esquire and John F. Povilaitis, Esquire of the law firm of Buchanan Ingersoll & Rooney PC appear as qualified representatives for EFS Shady Hills LLC (“Shady Hills”).

1. Information regarding the qualifications and experience of Alan M. Seltzer and John F. Povilaitis is included in the attached Affidavits.
2. Undersigned counsel, an active member of the Florida Bar, will be associated with Attorneys Seltzer and Povilaitis for purposes of representing the interests of Shady Hills.
3. Counsel for Shady Hills contacted counsel for all parties in the matter of interest to Shady Hills, Docket No.: 140110-EI, In re: Petition for Determination of Need for Citrus County Combined Cycle Power Plant. No party has taken a position on this Request.

Dated this 16th day of July, 2014.



LINDA LOOMIS SHELLEY
Florida Bar No: 240621
BUCHANAN INGERSOLL & ROONEY /
FOWLER WHITE BOGGS PA
101 North Monroe Street, Suite 1090
Tallahassee, FL 32301
Linda.Shelley@bipc.com
(850) 681-4260
Fax: (850) 681-6036

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Qualified Representative)
Status.)

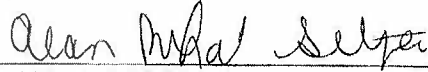
DOCKET NO. 140008-OT
Filed: July 16, 2014

AFFIDAVIT

ALAN M. SELTZER, being first duly sworn, states that:

1. I am an attorney with the law firm of Buchanan Ingersoll & Rooney, PC.
2. I am a member in good standing of the Bar of Pennsylvania and am admitted to practice in the State of Ohio, before the United States District Court for the Eastern and Western Districts of Pennsylvania, United States Court of Appeals for the Third Circuit, and the United States Supreme Court.
3. I am experienced in the matters involved in public utility regulation and have practiced extensively before agencies engaged in such regulation.
4. I have reviewed the relevant portions of Florida Statutes relative to the Commission's jurisdiction; (2) have reviewed the Florida Rules of Procedure relating to discovery rules in an administrative proceeding; and (3) have reviewed portions of the Florida Administrative Code and Florida Statutes related to the rules of Evidence, including the concept of hearsay in an administrative proceeding.
5. I have acquired actual knowledge of the factual and legal issues involved in all docketed or non-docketed matters in which I will represent the interests of Shady Hills.

RESPECTFULLY SUBMITTED this 16th day of July, 2014.



ALAN M. SELTZER
Pennsylvania ID No: 27890

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Qualified Representative)
Status.)


DOCKET NO. 140008-OT
Filed: July 16, 2014

AFFIDAVIT

JOHN F. POVILAITIS, being first duly sworn, states that:

1. I am an attorney with the law firm of Buchanan Ingersoll & Rooney, PC.
2. I am a member in good standing of the Bar of Pennsylvania and am admitted to practice in the State of Ohio, before the United States District Court for the Middle and Western Districts of Pennsylvania, United States District Court for the District of Columbia, United States Court of Appeals for the Third Circuit, and District of Columbia Circuit, and the United States Supreme Court.
3. I am experienced in the matters involved in public utility regulation and have practiced extensively before agencies engaged in such regulation.
4. I have reviewed the relevant portions of Florida Statutes relative to the Commission's jurisdiction; (2) have reviewed the Florida Rules of Procedure relating to discovery rules in an administrative proceeding; and (3) have reviewed portions of the Florida Administrative Code and Florida Statutes related to the rules of Evidence, including the concept of hearsay in an administrative proceeding.
5. I have acquired actual knowledge of the factual and legal issues involved in all docketed or non-docketed matters in which I will represent the interests of Shady Hills.

RESPECTFULLY SUBMITTED this 16th day of July, 2014.



JOHN F. POVILAITIS
Pennsylvania ID No: 28944

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following by electronic mail this 16th day of July, 2014:

J. Michael Walls
Blaise N. Gamba
Carlton Law Firm
4221 W. Boy Scout Blvd. Suite 1000
Tampa, FL 33607-5780
mwalls@CFJBlaw.com
bgamba@CFJBLaw.com

Matthew R. Bernier
Paul Lewis, Jr.
106 East College Avenue, Suite 800
Tallahassee, FL 32301
Matthew.bernier@duke-energy.com
Paul.Lewisjr@duke-energy.com

Robert Scheffel Wright
John T. LaVia, III
Gardner, Bist, Wiener, Wadsworth,
Bowden, Bush, Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Marsha E. Rule
Rutledge Ecenia, P.A.
119 South Monroe Street, Suite 202
Tallahassee, Florida 32301
marsha@rutledge-ecenia.com

Richard A. Zambo
Richard A. Zambo, P.A.
2336 S.E. Ocean Boulevard, #309
Stuart, Florida 34966
richzambo@aol.com

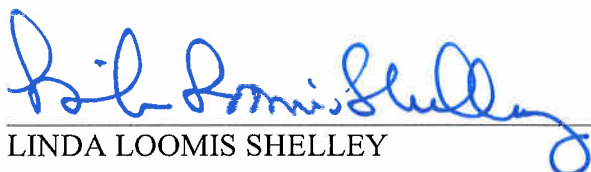
Gordon D. Polozola
General Counsel
South Central Region NRG Energy, Inc.
112 Telly Street
New Roads, LA 70760
Gordon.Polozola@nrgenergy.com

John T. Burnett
Dianne M. Triplett
Duke Energy
P. O. Box 14042
St. Petersburg, FL 33733
John.burnett@duke-energy.com
Dianne.triplett@duke-energy.com

J.R. Kelly
Charles J. Rehwinkel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street Room 812
Tallahassee, FL 32399-1400
Kelly.jr@leg.state.fl.us

Michael Lawson
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399
mlawson@psc.state.fl.us

James W. Brew
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW Eighth
Floor
West Tower
Washington, DC 20007-5201
jbrew@bbrslaw.com



LINDA LOOMIS SHELLEY