

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In Re: Applications for qualified
Representative status)
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Docket No. 20210008-OT
Filed: February 3, 2021

REQUEST FOR NAMING OF QUALIFIED REPRESENTATIVE

Pursuant to Rules 28-106.106 and 28-106.107, Florida Administrative Code, Nucor Steel Florida, Inc. ("Nucor") requests that Michael K. Lavanga, an attorney with the law firm Stone Mattheis Xenopoulos & Brew, PC, be named a qualified representative for Nucor in all docketed and non-docketed matters before the Commission.

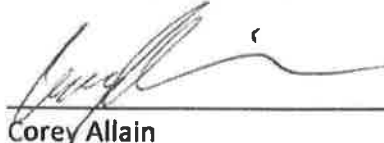
1. Mr. Lavanga's business address is as follows:

Michael K. Lavanga, Esq.
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., NW
Suite 800 West
Washington, D.C. 20007
(202) 342-0800
(202) 342-0807 (fax)
mkl@smxblaw.com

2. Consistent with Rule 25-106.106(2)(a), F.A.C., Nucor is aware that it can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1) of the Florida Administrative Code.
3. Nucor submits that Mr. Lavanga possesses the necessary qualifications to responsibly represent Nucor in matters before the Commission. Mr. Lavanga's qualifications are set forth in the attached affidavit.

4. As reflected in Mr. Lavanga's affidavit, he: (i) is an attorney admitted to practice in the State of Virginia and the District of Columbia, (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding, and (iv) has reviewed those 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. Consistent with the standard set forth in Rule 28-106.106, F.A.C., Mr. Lavanga has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as his representation of Nucor is concerned in matters before the Commission.

Respectfully submitted,



Corey Allain
Controller
Nucor Steel Florida, Inc.
22 Nucor Drive
Frostproof, FL 33843
corey.allain@nucor.com
843-546-5777

Dated: February 3, 2021

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request for Naming of Qualified Representative has been furnished electronically and/or by U.S. Mail to the following on this 3rd day of February, 2021

| | |
|--|--|
| <p>Christopher T. Wright c/o Florida Power & Light Company 700 Universe Boulevard Juno Beach FL 33408 Christopher.Wright@fpl.com</p> | <p>Florida Power & Light Company Jason A. Higginbotham 700 Universe Boulevard Juno Beach FL 33408-0420</p> |
| <p>Florida Power & Light Company R. Wade Litchfield 700 Universe Voulevard Juno Beach FL 33408-0420</p> | <p>Florida Power & Light Company; Florida City Gas; Gulf Power Company Kenneth M. Rubin 700 Universe Boulevard Juno Beach FL 33408 ken.rubin@fpl.com</p> |
| <p>Nutrien Jessica E. DeMonte 500 Lake Cook Road, Suite 150 Deerfield IL 60015</p> | <p>PCS Phosphate - White Springs Laura W. Baker / James W. Brew c/o Stone Law Firm 1025 Thomas Jefferson St., NW, Ste 800 West Washington DC 20007 lwb@smxblaw.com jbrew@smxblaw.com</p> |
| <p>Vote Solar c/o Katie Chiles Ottenweller 838 Barton Woods Rd NE Atlanta GA 30307 katie@votesolar.org</p> | <p>Vote Solar Elizabeth Brooks Managing Director, Operations 360 22nd Street, Suite 730 Oakland CA 94612</p> |

/s/ Michael K. Lavanga
Michael K. Lavanga, Esq.
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., NW, Ste. 800 West
Washington, D.C. 20007
mkl@smxblaw.com

**BEFORE THE
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AFFIDAVIT

Michael K. Lavanga, being first duly sworn, states that:

1. I am an attorney with the law firm Stone Mattheis Xenopoulos & Brew, PC.
2. I represent Nucor Steel Florida, Inc. ("Nucor") in connection with certain regulatory matters relating to energy services.
3. I have prepared this affidavit in connection with Nucor's request that I be named a qualified representative of Nucor in all docketed and non-docketed matters before the Florida Public Service Commission ("Commission").
4. I possess the necessary qualifications to responsibly represent Nucor in all docketed and non-docketed matters before the Commission.
5. I am a member in good standing of the bars of Virginia and the District of Columbia and have appeared before utility regulatory agencies and authorities, including the Public Service Commissions of Missouri, Ohio, and South Carolina, and the Federal Energy Regulatory Commission.
6. I have knowledge of the Florida Statutes relevant to the Commission's jurisdiction; knowledge of the Florida Rules of Civil Procedure relating to discovery in administrative proceedings; and knowledge of the Florida Administrative Code and Florida Statutes relative to

the rules of evidence, including the concept of hearsay in administrative proceedings. I have acquired or will acquire knowledge of the factual and legal issues involved insofar as my representation of Nucor is concerned in proceedings before this Commission. I have knowledge of, am in compliance with, and will comply with the Standards of Conduct for qualified representatives contained in Rule 28-106.107, Florida Administrative Code.

I declare that the foregoing is true and correct based on my knowledge, information, and belief.

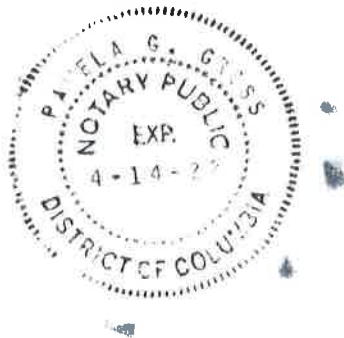

Michael K. Lavanga

Name and address:

Michael K. Lavanga, Esq.
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., NW,
Suite 800 West
Washington, D.C. 20007

SWORN TO AND SUBSCRIBED before me this 3rd day of February, 2021

District of Columbia) ss.




Notary Public
My Commission expires: April 14, 2022

PAMELA G. GROSS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires April 14, 2022