FILED 3/31/2025 DOCUMENT NO. 02362-2025 **FPSC - COMMISSION CLERK**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for Qualified **Representative Status**

Docket No. 20250008-OT Filed: March 31, 2025

PETITION TO INTERVENE OF ELECTRIFY AMERICA, LLC

Pursuant to Rule 28-106.106, Florida Administrative Code ("F.A.C."), Electrify America,

LLC ("Electrify America"), respectfully requests that the Florida Public Service Commission ("Commission") allow Stephen Bright to represent Electrify America as its qualified representative in Docket No. 20250011 -EI, In re: Florida Power & Light Company's Petition for a Base Rate Increase ("FPL Rate Case"). In support of this request and in compliance with Rule

28-106.106, Electrify America states the following:

Mr. Bright's address, e-mail address, and telephone number are as follows 1.

Stephen Bright, Esq. Electrify America, LLC 1950 Opportunity Way, Suite 1500 Reston, Virginia 20190 Phone: (781) 206-7979 Steve.Bright@electrifyamerica.com

Electrify America is aware of the services that Mr. Bright can provide, and 2.

submits that Mr. Bright possesses the necessary qualifications to responsibly represent Electrify

America in the FPL Rate Case. In support of this filing, Mr. Bright's qualifications are set forth

in the attached affidavit.

As reflected in Mr. Bright's affidavit, he: (i) is an attorney admitted to practice in 3.

the Commonwealth of Massachusetts and the State of Connecticut, (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, (iv) has reviewed those portions of the F.A.C. and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding, (v) has acquired or will acquire actual knowledge of the factual and legal issues involved in this proceeding, and (vi) has reviewed the Standards of Conduct for Qualified Representatives that appear in Rule 28-106.107, F.A.C.

4. Electrify America believes that Mr. Bright has the necessary qualifications to responsibly represent its interests in the FPL Rate Case in a manner which will not impair the fairness of the proceeding or the correctness of the action to be taken by the Commission.

WHEREFORE, for the above and foregoing reasons, Electrify America respectfully

requests that this Request for Naming of Qualified Representative be granted.

Respectfully submitted,

harph

Jigar J. Shah Director of Energy Services Electrify America, LLC 1950 Opportunity Way, Suite 1500 Reston, Virginia 20190 (703)-872-7944 Jigar.Shah@electrifyamerica.com

Dated: March 31, 2025



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications for Qualified Representative Status Docket No. 20250008-OT Filed: March 31, 2025

AFFIDAVIT OF STEPHEN BRIGHT, ESQ.

STEPHEN BRIGHT, being first duly sworn, states that:

- 1. I am an attorney at Electrify America, LLC ("Electrify America").
- 2. I am an attorney in good standing in the Commonwealth of Massachusetts (BBO

Number 681596) and the State of Connecticut (Juris Number 441721).

3. I specialize in the practice of public utility regulatory law and represent Electrify America in proceedings before state public utility commissions in numerous other states, including rate review proceedings and proceedings involving utility rates and electric vehicle programs.

4. I have prepared this affidavit in connection with Electrify America's request that I be named a qualified representative of Electrify America in Docket No. 20250011 -EI, In re: Florida Power & Light Company's Petition for a Base Rate Increase.

5. 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 in this matter and have

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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 support Electrify America's request to allow me to serve as Electrify America's 6. qualified representative in Docket No. 20250011-ЕІ, In re: Florida Power & Light Company's Petition for a Base Rate Increase. If the request is granted, I will abide by all applicable rules of procedure, conduct, and professionalism.

I hereby swear under penalty of perjury that foregoing is true and correct based on my knowledge, information, and belief.

Stephen Bright, Esq. Electrify America, LLC 1950 Opportunity Way, Suite 1500 Reston, Virginia 20190 Phone: (781) 206-7979 Steve.Bright@electrifyamerica.com

SWORN TO AND SUBSCRIBED before me this 7/Sh day of March, 2025.

Notary Public

My Commission Expires



Notary Public Commission Expires Mar 11, 2029



CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Request to Allow Representation by Qualified Representative and Affidavit of Stephen Bright has been furnished by electronic mail this 31st day of March 2025 to the following:

Adam Teitzman Commission Clerk Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Stephen Bright, Esq. Electrify America, LLC 1950 Opportunity Way, Suite 1500 Reston, Virginia 20190 Phone: (781) 206-7979 Steve.Bright@electrifyamerica.com