

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Commission review of numeric)
Conservation goals) Docket No. 20190018-EG
) Filed: July 22, 2019
_____)

**PREHEARING STATEMENT OF
WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.
d/b/a PCS PHOSPHATE – WHITE SPRINGS**

Pursuant to the Florida Public Service Commission’s *Order Establishing Procedure*, Order No. PSC-2019-0062-PCO-EG, issued February 18, 2019, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“PCS Phosphate”), through its undersigned attorneys, files its Prehearing Statement in the above matter.

A. APPEARANCES

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B. WITNESSES

PCS Phosphate does not plan to call any witnesses at this time.

C. EXHIBITS

PCS Phosphate does not plan to offer any exhibits at this time, but may introduce exhibits during the course of cross-examination.

D. STATEMENT OF BASIC POSITION

PCS Phosphate supports the energy efficiency and peak load reduction goals and priorities expressed in the Florida Energy Efficiency and Conservation Act (“FEECA”), Section 366.82, F.S. Specifically, FEECA directs the Commission to set “. . . goals designed to increase the conservation of expensive resources, such as petroleum fuels, to reduce and control the growth rates of electric consumption, to reduce the growth rates of weather-sensitive peak demand, and to encourage development of demand-side renewable energy resources.” PCS also supports the Commission’s rules implementing FEECA’s requirements which not only echo these goals, but further note that “[r]eduction in, and control of, the growth rates of electric consumption and of weather-sensitive peak demand are of particular importance.” F.A.C. § 25-17.001.

The purpose of the five-year cycle of review of utility conservation goals is to reinforce the system -wide benefits of cost-effective programs, remain mindful of the cost and rate impacts to all consumers, and to re-direct utility efforts as needed to better serve FEECA’s stated priorities. That purpose does not include the manufacture of new sets of priorities. Neither does it include arbitrary spending targets divorced from accepted measures of program cost-effectiveness. As in past proceedings, PCS Phosphate continues to support the Participant Test and Rate Impact Measure (“RIM”) test to evaluate the costs and benefits of particular measures.

In this case, PCS Phosphate considers the numeric conservation goals proposed by Duke Energy Florida (“DEF”) to represent a reasonable balance of encouraging demand-side management while managing the cost and rate impacts on its customers in a manner that is consistent with FEECA’s expressed aims.

E. STATEMENT ON SPECIFIC ISSUES

ISSUE 1: Are the Company’s proposed goals based on an adequate assessment of the full technical potential of all available demand-side and supply-side conservation and efficiency measures, including demand-side renewable energy systems, pursuant to Section 366.82(3), F.S.?

PCS Phosphate: No position at this time.

ISSUE 2: Do the Company’s proposed goals adequately reflect the costs and benefits to customers participating in the measure, pursuant to Section 366.82(3)(a), F.S.?

PCS Phosphate: Yes.

ISSUE 3: Do the Company’s proposed goals adequately reflect the costs and benefits to the general body of ratepayers as a whole, including utility incentives and participant contributions, pursuant to Section 366.82(3)(b), F.S.?

PCS Phosphate: Yes.

ISSUE 4: Do the Company’s proposed goals adequately reflect the need for incentives to promote both customer-owned and utility-owned energy efficiency and demand-side renewable energy systems, pursuant to Section 366.82(3)(c), F.S.?

PCS Phosphate: No position at this time.

ISSUE 5: Do the Company’s proposed goals adequately reflect the costs imposed by state and federal regulations on the emission of greenhouse gases, pursuant to Section 366.82(3)(d), F.S.?

PCS Phosphate: No position.

ISSUE 6: What cost-effectiveness test or tests should the Commission use to set goals, pursuant to Section 366.82, F.S.?

PCS Phosphate: PCS Phosphate supports the use of the Rate Impact Measure (“RIM”) test to evaluate the costs and benefits of specific DSM measures.

ISSUE 7: Do the Company’s proposed goals appropriately reflect consideration of free riders?

PCS Phosphate: No position at this time.

ISSUE 8: What residential summer and winter megawatt (MW) and annual Gigawatt-hour (GWh) goals should be established for the period 2020-2029?

PCS Phosphate: Duke Energy Florida’s proposed residential summer and winter megawatt and annual Gigawatt-hour goals for 2020-2029 are a

reasonable balance of FEECA's express goals and costs and rate impacts to Florida consumers and should be approved.

ISSUE 9: What commercial/industrial summer and winter megawatt (MW) and annual Gigawatt hour (GWh) goals should be established for the period 2020-2029?

PCS Phosphate: Duke Energy Florida's proposed commercial/industrial summer and winter megawatt and annual Gigawatt-hour goals for 2020-2029 are a reasonable balance of FEECA's express goals and costs and rate impacts to Florida consumers and should be approved.

ISSUE 10: What goals, if any, should be established for increasing the development of demand-side renewable energy systems, pursuant to Section 366.82(2), F.S.?

PCS Phosphate: No position at this time.

ISSUE 11: Should these dockets be closed?

PCS Phosphate: No position at this time.

PROPOSED SACE ISSUE: Should distinct goals for low income customers be established, and if so, what should those goals be?

PCS Phosphate: No position at this time.

PROPOSED F

F. PENDING MOTIONS

None.

G. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

H. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT

None at this time.

I. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE

There are no requirements of the Procedural Order with which PCS Phosphate cannot comply.

Respectfully submitted,

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Dated: July 22, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prehearing Statement of PCS Phosphate has been furnished by electronic mail this 22nd of July 2019, to the following:

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