

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery clause.)
_____)
Docket No. 20190002-EG
Filed: October 8, 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-2019-0082-PCO-EG, issued February 26, 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 generally adopts the positions taken by the Florida Office of Public Counsel (“OPC”) unless a differing position is specifically stated.

E. STATEMENT ON SPECIFIC ISSUES

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2018 through December 2018?

PCS Phosphate: Agree with OPC.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?

PCS Phosphate: Agree with OPC.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?

PCS Phosphate: Agree with OPC.

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2020 through December 2020?

PCS Phosphate: Agree with OPC.

ISSUE 5: What are the conservation cost recovery factors for the period January 2020 through December 2020?

PCS Phosphate: Agree with OPC.

ISSUE 6: What should be the effective date of the new conservation cost recovery factors for billing purposes?

PCS Phosphate: Agree with OPC.

ISSUE 7: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and energy conservation cost recovery factors determined to be appropriate in this proceeding?

PCS Phosphate: Agree with OPC.

COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

Tampa Electric Company

ISSUE 8: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2020 through December 2020?

PCS Phosphate: No position.

ISSUE 9: What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2020 through December 2020?

PCS Phosphate: No position.

ISSUE 10: What are the credit factors to be applied during the January 2020 billing cycles to refund the “Final Tax Savings Credit” amount of \$11,500,000.

PCS Phosphate: No position.

MISCELLANEOUS ISSUES

ISSUE 11: Should the Joint Motion to Modify Order No. PSC-2012-0425-PAA-EU Regarding Weighted Average Cost of Capital Methodology be approved?

PCS Phosphate: No position.

ISSUE 12: Should this docket be closed?

PCS Phosphate: No position.

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,

STONE MATTHEIS XENOPOULOS &
BREW, PC

/s/ James W. Brew

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Dated: October 8, 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 8th day of October 2018 to the following:

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