

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost recovery clause. ) Docket No. 20190007-EI  
\_\_\_\_\_ ) Filed: October 11, 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-2019-0072-PCO-EI, issued February 25, 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 accepts and adopts the positions taken by the Florida Office of Public Counsel (“OPC”) unless a differing position is stated with respect to an issue.

**E. STATEMENT ON SPECIFIC ISSUES**

**GENERIC ENVIRONMENTAL COST RECOVERY ISSUES**

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

**PCS Phosphate:** Agree with OPC.

**ISSUE 2:** What are the actual/estimated environmental cost recovery true-up amounts for the period January 2019 through December 2019?

**PCS Phosphate:** Agree with OPC.

**ISSUE 3:** What are the projected environmental cost recovery amounts for the period January 2020 through December 2020?

**PCS Phosphate:** Agree with OPC.

**ISSUE 4:** What are the environmental cost recovery amounts, including true-up amounts, for the period January 2020 through December 2020?

**PCS Phosphate:** Agree with OPC.

**ISSUE 5:** What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2020 through December 2020?

**PCS Phosphate:** Agree with OPC.

**ISSUE 6:** What are the appropriate jurisdictional separation factors for the projected period January 2020 through December 2020?

**PCS Phosphate:** Agree with OPC.

**ISSUE 7:** What are the appropriate environmental cost recovery factors for the period January 2020 through December 2020 for each rate group?

**PCS Phosphate:** Agree with OPC.

**ISSUE 8:** What should be the effective date of the new environmental cost recovery factors for billing purposes?

**PCS Phosphate:** Agree with OPC.

**ISSUE 9:** Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

**PCS Phosphate:** Agree with OPC.

**ISSUE 10:** Should this docket be closed?

**PCS Phosphate:** No position.

## **COMPANY-SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES**

### **Duke Energy Florida, LLC**

**ISSUE 11:** Should the Commission approve DEF's Crystal River Coal Combustion Residual Ash Landfill Project for cost recovery through the Environmental Cost Recovery Clause?

**PCS Phosphate:** Agree with OPC.

**ISSUE 12:** How should any approved Environmental Cost Recovery Clause costs associated with DEF's Crystal River CCR Ash Landfill Project be allocated to the rate classes?

**PCS Phosphate:** Agree with OPC.

**ISSUE 13:** Should the Commission approve DEF's proposed treatment for the ECRC assets associated with the retirement of Avon Park and Higgins, as proposed in DEF's 2020 Projection Filing?

**PCS Phosphate:** Agree with OPC.

### **Gulf Power Company**

**ISSUE 14:** Should the Commission approve the 2020 expenditures for Gulf's ownership portion of the Plant Daniel CCR projects for recovery through the Environmental Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 15:** Should the Commission approve Gulf's Crist Closed Ash Landfill Project for cost recovery through the Environmental Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 16:** How should any approved Environmental Cost Recovery Clause costs associated with Gulf's Crist Closed Ash Landfill Project be allocated to the rate classes?

**PCS Phosphate:** No position.

**OTHER**

**ISSUE 17:** 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.

**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 11, 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 11th of October 2019, to the following:

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