

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for limited proceeding for	)	
recovery of incremental storm restoration costs	)	
related to Hurricane Idalia, by Duke Energy	)	DOCKET NO. 20230116-EI
Florida, LLC.	)	
	)	
In re: Petition for limited proceeding for	)	
recovery of incremental storm restoration costs	)	
related to Hurricanes Elsa, Eta, Isaias, Ian,	)	
Nicole, and Tropical Storm Fred, by Duke	)	DOCKET NO. 20230020-EI
Energy Florida, LLC.	)	FILED: May 12, 2025
	)	

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**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-2025-0067-PCO-EI, issued March 5, 2025, 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**

Only costs prudently incurred and legally authorized may be recovered by Duke Energy Florida, LLC (“DEF”) in its petition to recover storm restoration costs related to Hurricane Idalia. In the *Order Approving Duke Energy Florida, LLC’s Interim Storm Cost Recovery Charge*, Order No. PSC-2023-0375-PCO-EI, issued on December 19, 2023, the Commission approved DEF’s request to combine Hurricane Idalia costs with the remaining interim incremental storm restoration costs for Hurricanes Elsa, Eta, Isaias, Ian, Nicole, and Tropical Storm Fred, approved in Docket No. 20230020-EI, for a total of \$166.1 million to be recovered over the January 2024 to December 2024 timeframe. DEF must satisfy the burden of proving the reasonableness of any expenditures for which recovery or other relief is sought in this proceeding.

### **E. STATEMENT ON SPECIFIC ISSUES**

**ISSUE 1:** Should the incremental cost and capitalization approach (ICCA) found in Rule 25-6.0143, F.A.C., be used to determine the reasonable and prudent amounts to be included in restoration costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 2:** Have the terms of DEF’s 2021 Settlement Agreement, approved by Order No. PSC-2021-0202A-AS-EI, issued June 28, 2021, been complied with? If not, why not?

**PCS Phosphate:** Agree with OPC

**ISSUE 3:** What is the reasonable and prudent amount of regular payroll expense to be included in Total Storm Related Restoration Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC

**ISSUE 4:** What is the reasonable and prudent amount of overtime payroll expense to be included in Total Storm Related Restoration Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 5:** What is the reasonable and prudent amount of contactor costs, including vegetation and line clearing, to be included in Total Storm Related Restoration Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 6:** What is the reasonable and prudent amount of vehicle and fuel expense to be included in Total Storm Related Restoration Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 7:** What is the reasonable and prudent amount of employee expenses to be included in Total Storm Related Restoration Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 8:** What is the reasonable and prudent amount of materials and supplies expense to be included in Total Storm Related Restoration Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 9:** What is the reasonable and prudent amount of other costs to be included in Total Storm Related Restoration Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 10:** What is the reasonable and prudent total amount of costs to be included in Total Storm Related Restoration Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 11:** What is the reasonable and prudent amount of storm-related costs that should be capitalized for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 12:** What is the reasonable and prudent amount of storm-related costs that should be ICCA non-incremental O&M adjustments for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 13:** What is the reasonable and prudent amount of retail Recoverable Storm Costs for Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 14:** What is the reasonable and prudent amount of the combined retail Recoverable Storm Costs for Hurricanes Elsa, Eta, Isaias, Ian, Nicole, Tropical Storm Fred and Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 15:** What is the combined amount of Recoverable Storm Costs recovered through the Storm Cost Recovery Surcharge for Hurricanes Elsa, Eta, Isaias, Ian, Nicole, Tropical Storm Fred and Hurricane Idalia?

**PCS Phosphate:** Agree with OPC.

**ISSUE 16:** What is the appropriate accounting treatment associated with any storm costs for Hurricanes Elsa, Eta, Isaias, Ian, Nicole, Tropical Storm Fred and Hurricane Idalia found to have been imprudently recovered?

**PCS Phosphate:** Agree with OPC.

**ISSUE 17:** If applicable, how should any under-recovery or over-recovery be handled?

**PCS Phosphate:** Consistent with the Commission's Order No. PSC-2024-0377-FOF-EI, issued in this proceeding on August 27, 2024, "only one cost recovery method should be used for both collection and refund of storm restoration costs." Any under- or over-recovery should be recovered or refunded on an energy basis as the Commission directed in that order.

**ISSUE 18:** Should this docket be closed?

**PCS Phosphate:** No position at this time.

**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. REQUEST FOR SEQUESTRATION OF WITNESSES**

PCS Phosphate does not request the sequestration of witnesses at this time.

**J. 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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*Attorneys for White Springs Agricultural Chemicals, Inc.*

*d/b/a PCS Phosphate – White Springs*

Dated: May 12, 2025

## 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 12th of May 2025, to the following:

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