

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost recovery clause. ) Docket No. 20180007-EI  
\_\_\_\_\_ ) Filed: October 12, 2018

**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-2018-0090-PCO-EI, issued February 19, 2018, as modified by *First Order Modifying Order Establishing Procedure*, Order no. PSC-2018-0248-PCO-PCU, issued May 14, 2018, 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 ISSUES**

**ISSUE 1:** What are the final environmental cost recovery true-up amounts for the period January 2017 through December 2017?

**PCS Phosphate:** Agree with OPC.

**ISSUE 2:** What are the estimated/actual environmental cost recovery true-up amounts for the period January 2018 through December 2018?

**PCS Phosphate:** Agree with OPC.

**ISSUE 3:** What are the projected environmental cost recovery amounts for the period January 2019 through December 2019?

**PCS Phosphate:** Agree with OPC.

**ISSUE 4:** What are the environmental cost recovery amounts, including true-up amounts, for the period January 2019 through December 2019?

**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 2019 through December 2019?

**PCS Phosphate:** Agree with OPC.

**ISSUE 6:** What are the appropriate jurisdictional separation factors for the projected period January 2019 through December 2019?

**PCS Phosphate:** Agree with OPC.

**ISSUE 7:** What are the appropriate environmental cost recovery factors for the period January 2019 through December 2019 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:** No position.

## COMPANY-SPECIFIC ISSUES

### Duke Energy Florida, LLC

**ISSUE 9A:** Should DEF be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Crystal River Flue Gas Desulfurization (FGD) Blowdown Pond Closure project?

**PCS Phosphate:** Agree with OPC.

**ISSUE 9B:** How should costs associated with DEF's proposed Crystal River FGD Blowdown Pond Closure project be allocated to rate classes?

**PCS Phosphate:** Agree with OPC.

### Florida Power & Light Company

**ISSUE 10A:** Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modifications to its Manatee Temporary Heating System project?

**PCS Phosphate:** No position.

**ISSUE 10B:** Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modifications to its National Pollution Discharge Elimination System Permit Renewal Requirement project?

**PCS Phosphate:** No position.

**ISSUE 10C:** Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Solar Site Avian Monitoring and Reporting project?

**PCS Phosphate:** No position.

**ISSUE 10D:** How should costs associated with FPL's proposed Solar Site Avian Monitoring and Reporting project be allocated to rate classes?

**PCS Phosphate:** No position.

**ISSUE 10E:** Is FPL meeting remediation objectives in the Florida Department of Environmental Protection Consent Order and the Miami-Dade County DERM Consent Agreement in a timely manner? If not, what jurisdictional amounts, if any, should the Commission approve as reasonably projected?

**PCS Phosphate:** No position.

## **Gulf Power Company**

**ISSUE 11A:** Should Gulf be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed 316(b) Cooling Water Intake Structure Regulation project?

**PCS Phosphate:** No position.

**ISSUE 11B:** How should costs associated with Gulf's proposed 316(b) Cooling Water Intake Structure Regulation project be allocated to rate classes?

**PCS Phosphate:** No position.

## **Tampa Electric Company**

**ISSUE 12A:** Should TECO be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Big Bend Unit 1 Section 316(b) Impingement Mortality project?

**PCS Phosphate:** No position.

**ISSUE 12B:** How should costs associated with TECO's proposed Big Bend Unit 1 Section 316(b) Impingement Mortality project be allocated to rate classes?

**PCS Phosphate:** No position.

**ISSUE 12C:** Should TECO be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Big Bend Station Effluent Limitations Guidelines (ELG) Rule Compliance project?

**PCS Phosphate:** No position.

**ISSUE 12D:** How should costs associated with TECO's proposed Big Bend Station ELG Rule Compliance project be allocated to rate classes?

**PCS Phosphate:** No position.

## **EFFECTIVE DATE**

**ISSUE 13:** 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 14:** 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,

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*Attorneys for White Springs Agricultural Chemicals, Inc.  
d/b/a PCS Phosphate – White Springs*

Dated: October 12, 2018

## 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 October 2018, to the following:

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