

**Eric Fryson**

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**Sent:** Friday, October 05, 2012 12:37 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Charles Murphy; rlmcgee@southernco.com; Captain Samuel Miller; Charles Rehwinkel; Denise Vandiver; Dianne M. Triplett; Al Taylor; Gary V. Perko; J. Jeffrey Wahlen; J. R. Kelly; James D. Beasley; Jay Brew; Jeffrey Stone; John T. Burnett; John T. Butler; Jon C. Moyle, Jr.; Kenneth Hoffman; Patty Christensen; Paul Lewis, Jr.; Paula K. Brown; Russell A. Badders; Steven R. Griffin; Tricia Merchant; Vicki Gordan Kaufman  
**Subject:** FPSC Docket 120007-EI - PCS Phosphate's Prehearing Statement  
**Attachments:** PCS Prehearing Statement\_2012FINAL.pdf

- a. Person responsible for filing

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- b. Docket No. 120007-EI, In Re: Environmental Cost Recovery Clause
- c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs
- d. Total Pages = 5
- e. PCS Phosphate's Prehearing Statement

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FPSC-COMMISSION CLERK

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Environmental Cost  
Recovery Clause**

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**Docket No. 120007-EI  
Filed: October 5, 2012**

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

Pursuant to the Florida Public Service Commission's February 10, 2012 *Order Establishing Procedure*, Order No. PSC-12-0060-PCO-EI, and the February 14, 2012 *First Amendatory Order*, PSC-12-0060A-PCO-EI (together, "*Procedural Orders*") White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs ("PCS Phosphate"), through its undersigned attorney, files its Prehearing Statement.

**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.

**D. STATEMENT OF BASIC POSITION**

At this time, PCS Phosphate generally accepts and adopts the positions taken by the Florida Industrial Power Users Group (“FIPUG”).

**E. STATEMENT ON SPECIFIC ISSUES**

With respect to the various issues presented in this proceeding, PCS Phosphate takes no position regarding the resolution of the issues with respect to any utility other than Progress Energy Florida (“Progress”). PCS Phosphate takes the following positions on the specific issues presented below as they pertain to Progress:

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**Generic Environmental Cost Recovery Issues**

**ISSUE 1      What are the final environmental cost recovery true-up amounts for the period January 2011 through December 31, 2011?**

**PCS Phosphate:** With respect to Progress, PCS Phosphate agrees and adopts the position of FIPUG.

**ISSUE 2      What are the estimated/actual environmental cost recovery true-up amounts for the period January 2012 through December 2012?**

**PCS Phosphate:** With respect to Progress, PCS Phosphate agrees and adopts the position of FIPUG.

**ISSUE 3      What are the projected environmental cost recovery amounts for the period January 2013 through December 2013?**

**PCS Phosphate:** With respect to Progress, PCS Phosphate agrees and adopts the position of FIPUG.

**ISSUE 4      What are the environmental cost recovery amounts, including true-up amounts, for the period January 2013 through December 2013?**

**PCS Phosphate:** With respect to Progress, PCS Phosphate agrees and adopts the position of FIPUG.

**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 2013 through December 2013?**

**PCS Phosphate:** With respect to Progress, PCS Phosphate agrees and adopts the position of FIPUG.

**ISSUE 6**      **What are the appropriate jurisdictional separation factors for the projected period January 2013 through December 2013?**

**PCS Phosphate:** With respect to Progress, PCS Phosphate agrees and adopts the position of FIPUG.

**ISSUE 7**      **What are the appropriate environmental cost recovery factors for the period January 2013 through December 2013 for each rate group?**

**PCS Phosphate:** With respect to Progress, PCS Phosphate agrees and adopts the position of FIPUG.

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

**PCS Phosphate:** With respect to Progress, PCS Phosphate agrees and adopts the position of FIPUG.

**Company Specific Environmental Cost Recovery Issues**

**ISSUE 10A**    **Should the Commission approve PEF's Review of Integrated Clean Air Compliance Plan as reasonable?**

**PCS Phosphate:** PCS Phosphate agrees and adopts the position of FIPUG.

**F. STIPULATED ISSUES**

PCS Phosphate is not a party to any stipulated issues.

**G. PENDING MOTIONS**

None.

**H. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY**

None.

**I. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT**

None at this time.

**J. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE**

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

Respectfully submitted the 5<sup>th</sup> day of October, 2012.

BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.

*s/ James W. Brew* \_\_\_\_\_

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*d/b/a/ PCS Phosphate – White Springs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing has been furnished by electronic mail and/or U.S. Mail this 5th day of October 2012 to the following:

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s/ F. Alvin Taylor