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Sent: Monday, October 08, 2012 3:37 PM
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Subject: FPSC Docket 120002-EI - PCS Phosphate's Prehearing Statement
Attachments: PCS Prehearing Statement_2012FINAL.pdf

a. Person responsible for filing

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b. Docket No. 120002-EI, In Re: Energy Conservation 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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10/8/2012

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Energy Conservation Cost
Recovery Clause**

**Docket No. 120002-EG
Filed: October 8, 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-12-0062-PCO-EG ("*Procedural Order*"), 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, but may introduce exhibits during the course of cross-examination.

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

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2011 through December 2011?

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

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2013 through December 2013?

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

ISSUE 3: What are the conservation cost recovery factors for the period January 2013 through December 2013?

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

ISSUE 4: What should be the effective date of the new conservation cost recovery factors for billing purposes?

PCS Phosphate: PCS Phosphate agrees with 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 Order* with which PCS Phosphate cannot comply.

Respectfully submitted the 8th day of October, 2012.

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

s/ James W. Brew _____

James W. Brew

F. Alvin Taylor

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Attorneys for

White Springs Agricultural Chemicals, Inc.

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 8th day of October 2012 to the following:

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Suzanne Brownless 1301 Miccosukee Road Tallahassee, FL 32308	Southern Alliance for Clean Energy c/o George Cavros, Esq. 120 East Oakland Park Blvd., Suite 105 Fort Lauderdale, FL 33334
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s/ F. Alvin Taylor