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Subject: FPSC Docket 130001-EI - PCS Phosphate's Prehearing Statement
Attachments: PCS Prehearing Statement 2013 FINAL.pdf

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- b. Docket No. 130001-EI, In Re: Fuel and Purchased Power Cost Recovery Clause and Generating Performance Incentive Factor
- c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs
- d. Total Pages = 8
- e. PCS Phosphate's Prehearing Statement

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power)
Cost Recovery Clause with Generating)
Performance Incentive Factor)
_____)

Docket No. 130001-EI
Filed: October 7, 2013

PREHEARING STATEMENT OF
WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.
D/B/A PCS PHOSPHATE – WHITE SPRINGS

Pursuant to the Florida Public Service Commission’s February 4, 2013 *Order Establishing Procedure*, Order No. PSC-13-0069-PCO-EI and the February 27, 2013 *Order Amending Order Establishing Procedure*, Order No. PSC-13-0104-PCO-EI (together, “*Procedural Order*”), White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“PCS Phosphate”), through its undersigned attorneys, 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

PCS Phosphate generally accepts and adopts the positions taken by the Florida Office of Public Counsel ("OPC") with respect to the fuel costs sought to be recovered by Duke Energy Florida ("Duke").

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 Duke Energy Florida. PCS Phosphate takes the following positions on the specific issues presented below as they pertain to Duke:

FUEL ISSUES

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

Duke Energy Florida, Inc.

ISSUE 1A: Should the Commission approve as prudent, DEF's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in DEF's April 2013 and August 2013 hedging reports?

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

ISSUE 1B: Should the Commission approve DEF's 2014 Risk Management Plan?

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

ISSUE 1C: Has DEF correctly reflected necessary refunds and adjustments pursuant to either the Settlement approved in Order No. PSC-12-0104-FOF-EI or the Revised and Restated Stipulation and Settlement Agreement filed in Docket 130208, as appropriate, in the calculation of the 2014 factors?

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

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 6: What are the appropriate actual benchmark levels for calendar year 2013 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 7: What are the appropriate estimated benchmark levels for calendar year 2014 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 8: What are the appropriate fuel adjustment true-up amounts for the period January 2012 through December 2012?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 9: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2013 through December 2013?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 10: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2014 to December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 11: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

ISSUE 16: What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2012 through December 2012 for each investor-owned electric utility subject to the GPIF?

PCS Phosphate: No position.

ISSUE 17: What should the GPIF targets/ranges be for the period January 2014 through December 2014 for each investor-owned electric utility subject to the GPIF?

PCS Phosphate: No position.

ISSUE 18: Should the Commission consider modification of the existing GPIF mechanism at this time?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

FUEL FACTOR CALCULATION ISSUES

ISSUE 19: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 20: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 21: What are the appropriate levelized fuel cost recovery factors for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 22: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 23: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

CAPACITY ISSUES

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

Duke Energy Florida, Inc.

ISSUE 24: Has DEF included in the capacity cost recovery clause, the nuclear cost recovery amount ordered by the Commission in Docket No. 130009-EI?

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

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 28: What are the appropriate capacity cost recovery true-up amounts for the period January 2012 through December 2012?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 29: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2013 through December 2013?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 30: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 31: What are the appropriate projected total capacity cost recovery amounts for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 32: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 33: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 34: What are the appropriate capacity cost recovery factors for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

EFFECTIVE DATE

ISSUE 35: What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees with and adopts the position of the OPC.

ISSUE 36: Should this Docket be closed?

PCS Phosphate: Yes

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 7th day of October, 2013.

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

s/ James W. Brew

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of PCS Phosphate's Prehearing Statement has been served by electronic and/or U. S. mail on this 7th day of October, 2013:

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