

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.) Docket No. 160007-EI
_____) Filed: October 4, 2016

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

Pursuant to the Florida Public Service Commission’s Order No. PSC-16-0103-PCO-EI, 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”).

E. STATEMENT ON SPECIFIC ISSUES

GENERIC ISSUES

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2015 through December 2015?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

ISSUE 2: What are the estimated/actual/estimated environmental cost recovery true-up amounts for the period January 2016 through December 2016?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2017 through December 2017?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts and revenue taxes, for the period January 2017 through December 2017?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

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 2017 through December 2017?

PCS Phosphate: No position at this time.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2017 through December 2017?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2017 through December 2017 for each rate group?

PCS Phosphate: No position at this time.

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

PCS Phosphate: No position.

ISSUE 9A: Should all issues related to Gulf's recovery of its identified environmental compliance investment and expenses associated with Gulf's 25% ownership interest in Scherer Unit 3 be carved out and deferred for resolution in Gulf's rate case pending in Docket No. 160186-EI? Disposal Project?

PCS Phosphate: No position.

ISSUE 9B: Do Gulf's proposed environmental compliance costs associated with Scherer 3 qualify for recovery through the Environmental Cost Recovery Clause?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

ISSUE 9C: Should any costs associated with Gulf's 25% ownership interest in Scherer Unit 3 be recovered through the Environmental Cost Recovery Clause?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

PCS Phosphate: No position.

ISSUE 10: Should issues related to FPL's recovery of its projected 2017 costs for the Turkey Point Cooling Canal Monitoring Plan project be deferred for resolution in the 2017 ECRC docket?

PCS Phosphate: No position.

ISSUE 11: Should the Commission approve DEF's proposed treatment for Bartow-Anclote Pipeline and Turner CT projects, as proposed in DEF's 2016 Estimated Actual and 2017 Projection Filings?

PCS Phosphate: No position.

ISSUE 12: 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: 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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Dated: October 4, 2016

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prehearing Statement of PCS Phosphate has been furnished by electronic mail and/or U.S. Mail this 4th day of October 2016 to the following:

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