BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery)	Docket No. 20230002-EG
clause)	Filed: October 6, 2023
)	

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-2023-0086-PCO-EG, issued February 15, 2023, 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

James W. Brew
Laura Wynn Baker
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007
(202) 342-0800
(202) 342-0807 (fax)
Email: jbrew@smxblaw.com
lwb@smxblaw.com

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 adopts the positions taken by the Florida Office of Public Counsel ("OPC") unless a differing position is specifically stated.

E. STATEMENT ON SPECIFIC ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2022 through December 2022?

PCS Phosphate: Agree with OPC.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded in the period January 2024 through December 2024?

PCS Phosphate: Agree with OPC.

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2024 through December 2024?

PCS Phosphate: Agree with OPC.

ISSUE 5: What are the conservation cost recovery factors for the period January 2024 through December 2024?

PCS Phosphate: Agree with OPC.

ISSUE 6: What should be the effective date of the new conservation cost recovery factors for billing purposes?

PCS Phosphate: Agree with OPC.

ISSUE 7: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding?

PCS Phosphate: Agree with OPC.

Company Specific Conservation Cost Recovery Issues – Tampa Electric Company

ISSUE 8: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2024 through December 2024?

PCS Phosphate: Agree with OPC.

ISSUE 9: What are the residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2024 through December 2024?

PCS Phosphate: No position.

CLOSE THE DOCKET ISSUE

ISSUE 10: 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 Orders with which PCS Phosphate cannot comply.

Respectfully submitted,

STONE MATTHEIS XENOPOULOS & BREW, PC

/s/ James W. Brew
James W. Brew
Laura Wynn Baker
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007
(202) 342-0800
(202) 342-0807 (fax)

E-mail: jbrew@smxblaw.com laura.baker@smxblaw.com

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

Dated: October 6, 2023

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 6th of October 2023, to the following:

W. Trierweiler/P. Christensen/C. Rehwinkel/M. Wessling Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399 christensen.patty@leg.state.fl.us rehwinkel.charles@leg.state.fl.us Trierweiler.walt@leg.state.fl.us wessling.mary@leg.state.fl.us

Pickels/Stephanie A. Cuello
Duke Energy
106 East College Avenue, Suite 800
Tallahassee FL 32301-7740
FLRegulatoryLegal@duke-energy.com
matthew.bernier@duke-energy.com
robert.pickels@duke-energy.com
stephanie.cuello@duke-energy.com

Matthew R. Bernier/Robert L.

Tampa Electric Company Ms. Paula K. Brown Regulatory Affairs P. O. Box 111 Tampa FL 33601-0111 regdept@tecoenergy.com Walter Trierweiler Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 wtrierweiler@psc.state.fl.us

Florida Power & Light Company Kenneth A. Hoffman 134 W. Jefferson Street Tallahassee FL 32301 Kenneth.Hoffman@fpl.com Florida Public Utilities Company Mr. Mike Cassel/Derrick Craig 208 Wildlight Ave. Yulee FL 32097 mcassel@fpuc.com dcraig@chpk.com

Ausley Law Firm V. Ponder/J. Wahlen/M. Means P.O. Box 391 Tallahassee FL 32302 vponder@ausley.com jwahlen@ausley.com mmeans@ausley.com Florida Industrial Power Users Group Jon C. Moyle, Jr. c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 jmoyle@moylelaw.com mqualls@moylelaw.com

Florida Power & Light Company Maria Jose Moncada/ William Cox 700 Universe Boulevard Juno Beach FL 33408-0420 maria.moncada@fpl.com will.p.cox@fpl.com Stone Mattheis Xenopoulos & Brew, PC
Peter J. Mattheis/Michael K. Lavanga
1025 Thomas Jefferson St., NW, Ste. 800 West
Washington DC 20007-5201
mkl@smxblaw.com
pjm@smxblaw.com

Florida Public Utilities Company Michelle D. Napier 1635 Meathe Drive West Palm Beach FL 33411 mnapier@fpuc.com

Dianne M. Triplett
Duke Energy
299 First Avenue North
St. Petersburg FL 33701
Dianne.triplett@duke-energy.com

Nucor Steel Florida, Inc. Corey Allain 22 Nucor Drive Frostproof FL 33843 corey.allain@nucor.com

Gunster Law Firm Beth Keating 215 South Monroe Street, Suite 601 Tallahassee FL 32301 bkeating@gunster.com

/s/ Laura Wynn Baker