

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Elsa, Eta, Isaias, Ian, Nicole, and Tropical Storm Fred, by Duke Energy Florida, LLC.)
)
) Docket No. 20230020-EI
) FILED: April 29, 2024
)
)
_____)

**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-2023-0333-PCO-EI, issued November 2, 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

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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

Only costs prudently incurred and legally authorized may be recovered by Duke Energy Florida, LLC (“DEF”) in its petition to recover storm restoration costs related to several hurricanes and a tropical storm as well as to replenish DEF’s storm reserve. The Commission approved an initial interim storm restoration recovery charge for the period April 2023 through March 2024 in the *Order Approving Duke Energy Florida, LLC’s Interim Storm Cost Recovery Charge*, Order No. PSC-2023-0111-PCO-EI, issued on March 23, 2023. After DEF filed for a revised interim storm restoration recovery surcharge due to Hurricane Idalia, the Commission approved the revised interim surcharge through December 2024 in its *Order Approving Duke Energy Florida, LLC’s Interim Storm Cost Recovery Charge*, Order No. PSC-2023-0375-PCO-EI, issued on December 19, 2023. DEF must satisfy the burden of proving the reasonableness of any expenditures for which recovery or other relief is sought in this proceeding.

E. STATEMENT ON SPECIFIC ISSUES

ISSUE 1: Should the incremental cost and capitalization approach (ICCA) found in Rule 25-6.0143, F.A.C., be used to determine the reasonable and prudent amounts to be included in the restoration costs?

PCS Phosphate: Agree with OPC.

ISSUE 2: Have the terms of DEF’s 2019 Settlement Agreement, approved by Order No. PSC-2019-0232-AS-EI, issued June 13, 2019, been complied with? If not, why not?

PCS Phosphate: Agree with OPC.

ISSUE 3: What is the reasonable and prudent amount of regular payroll expense to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 4: What is the reasonable and prudent amount of overtime payroll expense to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 5: What is the reasonable and prudent amount of contractor costs, including vegetation and line clearing, to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 6: What is the reasonable and prudent amount of vehicle and fuel expense to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 7: What is the reasonable and prudent amount of employee expenses to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 8: What is the reasonable and prudent amount of materials and supplies expense to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 9: What is the reasonable and prudent amount of logistics costs to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 10: What is the reasonable and prudent amount of other costs to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 11: What is the reasonable and prudent total amount of costs to be included in Total Storm Related Restoration Costs?

PCS Phosphate: Agree with OPC.

ISSUE 12: What is the reasonable and prudent amount of storm-related costs that should be capitalized?

PCS Phosphate: Agree with OPC.

ISSUE 13: What is the reasonable and prudent amount of storm-related costs that should be ICCA non-incremental O&M adjustments?

PCS Phosphate: Agree with OPC.

ISSUE 14: What is the reasonable and prudent total amount of retail Recoverable Storm Costs?

PCS Phosphate: Agree with OPC.

ISSUE 15: What is the appropriate accounting treatment associated with any storm costs found to have been imprudently incurred?

PCS Phosphate: Agree with OPC.

ISSUE 16: If applicable, how should any under-recovery or over-recovery be handled?

PCS Phosphate: Agree with OPC.

ISSUE 17: Should this docket be closed?

PCS Phosphate: No position.

CONTESTED ISSUES

WALMART

ISSUE: Should any cost recovery approved in this docket be recovered from demand-metered customers through the demand charge?

PCS Phosphate: No.

OPC

ISSUE: What additional storm restoration process improvements, if any, should DEF follow in future storms?

PCS Phosphate: Agree with OPC.

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: April 29, 2024

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 29th of April 2024, to the following:

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