

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm protection plan cost recovery clause ) Docket No. 20240010-EI  
\_\_\_\_\_ ) Filed: July 31, 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-2024-0032-PCO-EI, issued February 6, 2024, as modified by the *First Order Modifying Order Establishing Procedure*, Order No. PSC-2024-0110-PCO-EI, issued April 19, 2024, 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 through the fuel clause. Florida electric utilities, including in particular Duke Energy Florida, LLC (“DEF”), must satisfy the burden of proving the reasonableness of any expenditures for which recovery or other relief is sought in this proceeding. DEF has filed for recovery of costs of its Storm Protection Plan (“SPP”), which was approved in 2022.<sup>1</sup> DEF’s approved SPPCRC revenue requirement for 2024 was \$201.3 million before accounting for prior year true-ups,<sup>2</sup> and its projected period 2025 SPPCRC revenue requirement for 2025 is \$301.1 million before accounting for prior year true-ups.<sup>3</sup> This is a 50% overall revenue requirement increase. According to DEF’s approved Storm Protection Plan, the utility’s SPP investments are supposed to begin generating substantial system benefits in the form of reduced outage times and restoration costs.<sup>4</sup> The Commission should begin requiring DEF to include in its annual SPPCRC filings an assessment of system benefits realized by program.

**E. STATEMENT ON SPECIFIC ISSUES**

**ISSUE 1A:** What jurisdictional amounts should the Commission approve as FPL’s final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 1B:** What jurisdictional amounts should the Commission approve as TECO’s final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

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<sup>1</sup> Docket 20220050-EI, Amended Final Order Approving, With Modifications, Duke Energy Florida’s Storm Protection Plan, Order No. PSC-2022-0388A-FOF-EI (Nov. 14, 2022) (“2022 SPP Approval Order”).

<sup>2</sup> See Docket No. 20230010-EI, *In re: Storm protection plan cost recovery clause*, Final Order Approving Storm Cost Recovery Amounts and Related Tariffs and Establishing Storm Cost Recovery Factors for the Period January 2024 through December 2024, Order No. PSC-2023-0364-FOF-EI at 17.

<sup>3</sup> See Exh. No. \_\_ (CAM-3), Form 1P at page 1 of 118.

<sup>4</sup> See 2022 SPP Approval Order.

**ISSUE 1C:** What jurisdictional amounts should the Commission approve as the FPUC’s final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 1D:** What jurisdictional amounts should the Commission approve as the DEF’s final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** Agree with OPC.

**ISSUE 2A:** What jurisdictional amounts should the Commission approve as the FPL’s reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 2B:** What jurisdictional amounts should the Commission approve as TECO’s reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 2C:** What jurisdictional amounts should the Commission approve as FPUC’s reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 2D:** What jurisdictional amounts should the Commission approve as DEF’s reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** Agree with OPC.

**ISSUE 3A:** What jurisdictional amounts should the Commission approve as FPL’s reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 3B:** What jurisdictional amounts should the Commission approve as TECO’s reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 3C:** What jurisdictional amounts should the Commission approve as FPUC's reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 3D:** What jurisdictional amounts should the Commission approve as DEF's reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**PCS Phosphate:** Agree with OPC.

**ISSUE 4A:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for FPL?

**PCS Phosphate:** No position.

**ISSUE 4B:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for TECO?

**PCS Phosphate:** No position.

**ISSUE 4C:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for FPUC?

**PCS Phosphate:** No position.

**ISSUE 4D:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for DEF?

**PCS Phosphate:** Agree with OPC.

**ISSUE 5A:** What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for FPL?

**PCS Phosphate:** No position.

**ISSUE 5B:** What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for TECO?

**PCS Phosphate:** No position.

**ISSUE 5C:** What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for FPUC?

**PCS Phosphate:** No position.

**ISSUE 5D:** What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for DEF?

**PCS Phosphate:** Agree with OPC.

**ISSUE 6A:** What are the appropriate 2025 jurisdictional separation factors for FPL?

**PCS Phosphate:** No position.

**ISSUE 6B:** What are the appropriate 2025 jurisdictional separation factors for TECO?

**PCS Phosphate:** No position.

**ISSUE 6C:** What are the appropriate 2025 jurisdictional separation factors for FPUC?

**PCS Phosphate:** No position.

**ISSUE 6D:** What are the appropriate 2025 jurisdictional separation factors for DEF?

**PCS Phosphate:** No position.

**ISSUE 7A:** What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPL?

**PCS Phosphate:** No position.

**ISSUE 7B:** What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for TECO?

**PCS Phosphate:** No position.

**ISSUE 7C:** What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPUC?

**PCS Phosphate:** No position.

**ISSUE 7D:** What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for DEF?

**PCS Phosphate:** Agree with OPC.

**ISSUE 8A:** What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPL?

**PCS Phosphate:** No position.

**ISSUE 8B:** What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for TECO?

**PCS Phosphate:** No position.

**ISSUE 8C:** What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPUC?

**PCS Phosphate:** No position.

**ISSUE 8D:** What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for DEF?

**PCS Phosphate:** Agree with OPC.

**ISSUE 9A:** Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPL?

**PCS Phosphate:** No position.

**ISSUE 9B:** Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for TECO?

**PCS Phosphate:** No position.

**ISSUE 9C:** Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPUC?

**PCS Phosphate:** No position.

**ISSUE 9D:** Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for DEF?

**PCS Phosphate:** Agree with OPC.

**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 Order with which PCS Phosphate cannot comply.

Respectfully submitted,

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*Attorneys for White Springs Agricultural Chemicals,  
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Dated: July 31, 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 31st of July, 2024, to the following:

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