

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy conservation cost recovery ) Docket No. 20240002-EG  
clause ) Filed: October 14, 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-2024-0028-PCO-EG, issued February 6, 2024, as amended by the *First Order Modifying Order Establishing Procedure*, Order No. PSC-2024-0212-PCO-EG, issued June 20, 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**

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 2023 through December 2023?

**PCS Phosphate:** Agree with OPC.

**ISSUE 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2024 through December 2024?

**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 2025 through December 2025?

**PCS Phosphate:** Agree with OPC.

**ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2025 through December 2025?

**PCS Phosphate:** Agree with OPC.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2025 through December 2025?

**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 2025 through December 2025?

**PCS Phosphate:** No position.

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2025 through December 2025?

**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

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

Dated: October 14, 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 14th of October 2024, to the following:

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