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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

COMMISSION
CLERK

In re: Petition for Rate Increase)
By Progress Energy Florida, Inc.)

Docket No. 050078-EI
Filed: March 31, 2005

PETITION TO INTERVENE OF
WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.
D/B/A PCS PHOSPHATE - WHITE SPRINGS

Pursuant to Chapter 120, Florida Statutes, and Rules 25-22.039 and 28-106.205,
Florida Administrative Code, White Springs Agricultural Chemicals, Inc. d/b/a PCS
Phosphate - White Springs ("White Springs"), through the undersigned counsel, files its
Petition to Intervene. In support thereof, White Springs states the following:

1. The affected agency is the Florida Public Service Commission, 2540
Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

2. The name and address of the Petitioner is:

White Springs Agricultural Chemicals, Inc.
d/b/a PCS Phosphate - White Springs
15843 SE 78th Street
P.O. Box 300
White Springs, FL 32096

3. Copies of all pleadings, notices, and orders in this docket should be
provided to:¹

- CMP _____
- COM 5
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- RCA _____
- SCR _____
- SEC 1
- OTH Kim P.

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¹ Concurrently with this Petition to Intervene, James M. Bushee, Daniel E. Frank and Andrew K. Soto, counsel for PCS, are filing with the Commission requests for authorization as qualified representatives of PCS.

*Done
out of
KMP*

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4. White Springs is a manufacturer of fertilizer products with plants and operations located within Progress Energy Florida Inc.'s (PEF) service territory in White Springs, Florida, and receives service under PEF's IS-1, IST-1, SS-2, GS-1, GSD-1, GSDT-1, and LS-1 Rates. During calendar year 2004, White Springs purchased from PEF, in total, approximately \$20 million worth of power.

5. Statement of Affected Interests. In this docket, the Commission will decide, among other things, whether to approve PEF's request for a permanent rate increase to be effective January 1, 2006 and approve electric rates reflecting its decision. The rates approved for recovery by PEF in this case will affect White Springs' substantial

interest by determining its cost of electricity, thus affecting its production costs, its competitive posture and its level of employment.

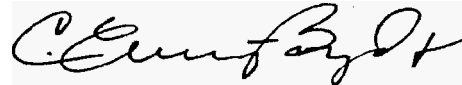
6. Disputed Issues of Material Fact. White Springs anticipates that there will be numerous disputed issues of material fact that the Commission will be required to resolve through an evidentiary hearing pursuant to Chapter 120, Florida Statutes. Such disputed issues of material fact include, but are not limited to, the following: (a) whether PEF has incurred or whether it is reasonable to expect that PEF will incur the costs for which it seeks recovery, (b) the appropriate return on equity (ROE), (c) the appropriate revenue requirement, (d) the appropriate rate design, and (e) cost allocation. White Springs anticipates that additional disputed issues of material fact will be identified in the course of these proceedings.

7. Disputed Legal Issues. White Springs anticipates that disputed legal issues will be identified in the course of these proceedings.

8. Statement of Ultimate Fact. Alleged ultimate facts include, but are not limited to, the following: (a) PEF has the burden to prove the costs for which it seeks recovery, (b) PEF has the burden to prove that such costs have been and will be appropriately accounted for and booked, (c) PEF has the burden to prove that the costs for which PEF seeks recovery were and are, or will be, reasonably and prudently incurred, (d) PEF has the burden to prove that no such costs are duplicative, and (e) PEF has the burden to prove that the rates it proposes are fair, just, reasonable and non-discriminatory. White Springs anticipates that additional alleged ultimate facts will be identified in the course of these proceedings.

Wherefore, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs respectfully requests that the Commission enter an order allowing it to intervene as a full party in this docket.

Respectfully submitted,



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

March 31, 2005

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Petition to Intervene has been furnished by electronic mail and U.S. Mail this 31st day of March 2005, to the following:

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