

Timolyn Henry

**From:** Cameron Prell [Cameron.Prell@bbrslaw.com]  
**Sent:** Friday, October 06, 2006 4:30 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Jay Brew; KSTorain@Potashcorp.com; ksimons@pcsphosphate.com  
**Subject:** PCS Phosphate - White Springs  
**Attachments:** PCS-WS\_Prehearing Statement.pdf

ELECTRONIC FILING

a. Person responsible for this electronic filing:

James W. Brew  
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b. Docket Nos. 060001-EI, *In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor*

c. Document being filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate White Springs ("White Springs").

d. There are a total of 4 pages.

e. The document attached for electronic filing is the Prehearing Statement of White Springs.

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DOCUMENT NUMBER-DATE

09280 OCT-6 8

FPSC-COMMISSION CLERK

10/6/2006

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power )  
Cost Recovery Clause with )  
Generating Performance Incentive )  
Factor )

Docket No.: 060001-EI

PREHEARING STATEMENT OF WHITE SPRINGS

Pursuant to the Orders Establishing Procedure in this docket, Order No. PSC-06-0207-PCO-EI, issued March 15, 2006, and Order No. PSC-06-0710-PCO-EI, issued August 23, 2006, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate White Springs ("White Springs") hereby files its Prehearing Statement.

A. APPEARANCES

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B. ALL KNOWN WITNESSES

None

C. ALL KNOWN EXHIBITS

None

D. STATEMENT OF BASIC POSITION

White Springs adopts as its own the positions on all of the issues taken by the Office of Public Counsel. White Springs maintains that the significant recent decline in the market price of natural gas and natural gas futures requires further updating of PEF's projected fuel cost recovery factors.

E. STATEMENT OF ISSUES AND POSITIONS

**GENERIC FUEL ADJUSTMENT ISSUES**

ISSUE 6: What are the appropriate levelized fuel cost recovery factors for the period January 2007 through December 2007?

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**White Springs:** Recommends updating levelized fuel cost recovery factors to reflect current market conditions.

**F. STIPULATED ISSUES**

None.

**G. PENDING MOTIONS**

None.

**H. STATEMENT OF PENDING REQUESTS OR CLAIMS OF CONFIDENTIALITY**

White Springs has no pending requests for claims of confidentiality.

**I. OBJECTIONS TO QUALIFICATIONS OF WITNESSES AS AN EXPERT**

White Springs does not anticipate challenging the qualification of any witness in this proceeding.

**J. STATEMENT OF COMPLIANCE WITH ORDERS ESTABLISHING PROCEDURE**

There are no requirements of the Orders Establishing Procedures with which White Springs cannot comply.

Respectfully submitted the 6<sup>th</sup> day of October, 2006.

BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.

*/s/ James W. Brew* \_\_\_\_\_

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

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Prehearing Statement has been furnished by electronic mail and U.S. Mail this 6th day of October 2006 to the following individuals:

*/s/ James W. Brew* \_\_\_\_\_

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<p>Jack Shreve  Senior General Counsel  Office of the Attorney General  The Capitol – PL01  Tallahassee, Florida 32399-1050</p>	