

Dorothy Menasco

From: Kate Wallman [Kate.Wallman@bbrslaw.com]
Sent: Monday, July 09, 2007 3:19 PM
To: Filings@psc.state.fl.us
Cc: Alex Glenn; Beth Keating; Dianne Triplett; James Walls; Joeseeph McGlothlin; John Burnett; John LaVia; John McWhirter; Karin Torin; Lisa Bennett; Mike Towmey; Patty Christensen; Paul Lewis; Robert Scheffel Wright
Subject: Docket No. 070052-EI Pre-hearing statement
Attachments: WS Prehearing Statement CR3.final.doc

ORIGINAL

1. James W. Brew, Brickfield, Burchette, Ritts & Stone, P.C., 1025 Thomas Jefferson Street, N.W., Eighth Floor, West Tower, Washington, D.C. 20007, jay.brew@bbrslaw.com is the person responsible for this electronic filing.
2. The filing is to be made in Docket 070052-EI, In re: Petition by Progress Energy Florida, Inc. to recovery costs of Crystal River 3 uprate through fuel clause. The filing is made on behalf of White Springs Agricultural Chemicals, Inc., d/b/a PCS Phosphate-White Springs.
3. The total number of pages is 6.
4. The attached document is the Pre-hearing statement of PCS Phosphate-White Springs.

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FPSC-COMMISSION CLERK

In Re: Petition by Progress Energy)
 Florida, Inc. to recover costs of) DOCKET NO. 070052-EI
 Crystal River Unit 3 uprate through)
fuel clause) FILED: July 9, 2007

PREHEARING STATEMENT OF PCS WHITE SPRINGS

Pursuant to the Orders Establishing Procedure in this docket, Order No. PSC-07-0390-PCO-EI, issued May 2, 2007, and Order No. PSC-07-0446-PCO-EI, issued May 23, 2007, 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 opposes fuel clause recovery of all phases of the proposed uprate to Crystal River unit 3. The character and magnitude of the planned investment compels recovery of these costs in base rates. White Springs generally supports the positions advocated by FIPUG and the Office of Public Counsel.

E. STATEMENT OF ISSUES AND POSITIONS

ISSUE 1: Should the Commission authorize clause recovery of the prudent and reasonable costs of the following:

a. Phase 1 of PEF's CR3 Uprate Project?

White Springs: Agree with FIPUG.

b. Phase 2 of PEF's CR3 Uprate Project?

White Springs: Agree with FIPUG.

c. Phase 3 of PEF's CR3 Uprate Project, including:

1. Nuclear Core Modifications, Secondary Systems, and Other Project-related Plant Additions/Modifications?

White Springs: Agree with FIPUG.

2. The "point of discharge" cooling solution?

White Springs: Agree with FIPUG.

3. Transmission upgrades associated with the CR3 Uprate Project?

White Springs: Agree with FIPUG.

4. Other costs associated with phase 3 of the CR3 Uprate Project?

White Springs: Agree with FIPUG.

ISSUE 2: If the Commission authorizes clause recovery of the CR3 Uprate Project, which cost recovery clause, fuel or capacity, is appropriate for capitalized costs attributable to the uprate?

White Springs: If clause recovery is authorized for any portion of the CR3 uprate project, those costs should be recovered through the capacity cost recovery clause.

ISSUE 3: If the Commission authorizes clause recovery of the CR3 Uprate Project, what capital recovery periods should the Commission prescribe for the assets?

White Springs: Agree with FIPUG.

ISSUE 4: Based on the recovery periods prescribed for the CR3 Uprate Project assets, what ratemaking adjustments, if any, are necessary?

White Springs: Agree with FIPUG and OPC.

ISSUE 5: If the Commission authorizes PEF clause recovery of the CR3 Uprate Project, what return on investment should the Commission authorize PEF to include?

White Springs: Agree with FIPUG.

ISSUE 6: If the Commission authorizes clause recovery of the CR3 Uprate Project, how should the costs associated with the project be allocated between wholesale and retail jurisdictions for rate recovery purposes?

White Springs: Agree with OPC.

ISSUE 7: If the Commission authorizes clause recovery of the CR3 Uprate Project, what reports, if any, should PEF be required to file with the Commission?

White Springs: Agree with OPC and FIPUG.

ISSUE 8: Should this docket be closed?

White Springs: No position at this time.

F. STIPULATED ISSUES

None.

G. PENDING MOTIONS

None.

H. STATEMENT OF PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

White Springs has no pending requests or claims for 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 9th day of July, 2007.

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

/s/ James W. Brew _____

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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 9th day of July, 2007 to the following individuals:

/s/ James W. Brew

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