

## Ruth Nettles

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**Subject:** FPSC Docket No. 080148 - PCS Phosphate's Proposed List of Issues  
**Attachments:** PCS List of Issues.doc

- a. Person responsible for filing  
  
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- b. Docket No. 080148-EI, In Re: Petition for Determination of Need for Levy Units 1 and 2 Nuclear Power Plants
- c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs
- d. Total Pages = 4
- e. Proposed List of Issues of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate (attached as PCS List of Issues.doc)

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FPSC-COMMISSION CLERK

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**In Re: Petition for Determination of )  
Need for Levy Units 1 and 2 Nuclear )  
Power Plants )**  
\_\_\_\_\_ )

**Docket No. 080148-EI  
Filed: April 18, 2008**

**PROPOSED LIST OF ISSUES OF  
WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.  
D/B/A PCS PHOSPHATE – WHITE SPRINGS**

Pursuant to the Florida Public Service Commission's March 12, 2008 *Order Establishing Procedure*, Order No. PSC-08-0151-PCO-EI, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs ("PCS Phosphate"), through its undersigned attorney, files this proposed List of Issues. This List of Issues includes the Tentative List of Issues identified by the Commission in Appendix A to the *Order Establishing Procedure* as well as additional issues proposed by PCS Phosphate.

**PROPOSED LIST OF ISSUES**

**Issue 1:** Is there a need for the proposed generating units, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(4), Florida Statutes?

**Issue 2:** Is there a need for the proposed generating units, taking into account the need for fuel diversity, as this criterion is used in Section 403.519(4), Florida Statutes?

**Issue 3:** Is there a need for the proposed generating units, taking into account the need for base-load generating capacity, as this criterion is used in Section 403.519(4), Florida Statutes?

**Issue 4:** Is there a need for the proposed generating units, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(4), Florida Statutes?

**Issue 5:** Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Progress Energy Florida, Inc. which might mitigate the need for the proposed generating units?

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**Issue 6:** Will the proposed generating units provide the most cost-effective source of power, as this criterion is used in Section 403.519(4), Florida Statutes?

**Issue 7:** Based on the resolution of the foregoing issues, should the Commission grant Progress Energy Florida, Inc.'s petition to determine the need for the proposed generating units?

**Issue 8:** Should the Commission separately assess the need for each of the proposed generating units using the criteria set forth in Section 403.519(4), Florida Statutes?

**Issue 9:** Has Progress Energy Florida, Inc. included all appropriate costs in its non-binding estimate necessary to accurately determine whether the proposed generating units provide the most cost-effective source of power, as this criterion is used in Section 403.519(4), Florida Statutes?

**Issue 10:** Has Progress Energy Florida, Inc. instituted sufficient safeguards to ensure that the estimated construction costs and schedule provided to the Commission in order determine whether the proposed generating units provide the most cost-effective source of power (as this criterion is used in Section 403.519(4), Florida Statutes) are realistic?

**Issue 11:** Should the Commission condition any finding of need upon a requirement that Progress Energy Florida, Inc. implement contractual strategies to reduce the risk of cost escalations in order to ensure that the continued validity of the Commission's cost-effectiveness analysis and protect ratepayers from unchecked price increases?

**Issue 12:** Should the Commission condition any finding of need on the establishment of a maximum cost for each proposed generating unit, above which that generating unit will no longer be deemed the most cost effective alternative available?

**Issue 13:** Should this docket be closed?

WHEREFORE, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate  
– White Springs respectfully requests that the Commission adopt this List of Issues for its  
consideration in this proceeding.

Respectfully submitted,

*s/ James W. Brew*

James W. Brew

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*d/b/a PCS Phosphate – White Springs*

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been furnished by electronic mail and/or U.S. Mail this 18th day of April 2008 to the following:

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