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Subject: FPSC Docket 080009-EI - White Springs' Post-workshop Comments on NCR lessons
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b. Docket No. 080009-EI, In re: Nuclear cost recovery clause

c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs

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e. Post-workshop Comments of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate White Springs

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December 18, 2008

Ann Cole, Clerk of the Commission
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**Re: Post- Workshop Comments regarding
Lessons Learned from the 2008 Nuclear Cost Recovery Proceedings**

Dear Ms. Cole:

White Springs Agricultural Chemicals Inc. d/b/a PCS Phosphate –White Springs (“White Springs”) offers the following comments in response to the November 20, 2008 workshop regarding Florida’s nuclear cost recovery proceedings. These comments pertain primarily to the Commission’s review of on-going feasibility of approved nuclear projects that is required by Rule 25-6.0423(5)(c)5, F.A.C.

Evaluating the on-going feasibility of a nuclear plant construction project requires a comprehensive assessment of a host of circumstances and risk factors. Some may be well within the scope of utility management control, while others may be wholly exogenous developments. Developments in various arenas may have compounding or offsetting implications for timely and cost-effective project completion.

To best address this dynamic circumstance and safeguard consumer interests, White Springs recommends that each utility be required under the Rule to file an annual stand-alone report that examines project status and all pertinent risk factors and developments that may have bearing on overall project feasibility. This report should be accompanied by written testimony from a company employee in a position of authority on such matters.

We expect that the NFR schedules should provide much of the raw data concerning current project status. The on-going feasibility evaluation, however, will require a comprehensive assessment of both project-specific and external factors, and those factors may wax and wane in importance over time. Consequently, White Springs advises against efforts to develop a specific rule that defines the precise elements that must be included in the annual feasibility report. Requiring submission of a detailed

report and a responsive witness that will be equipped to address Commission concerns in this area in NCRC proceedings will be more effective.

Thank you for the opportunity to submit these comments.

/s/ James W. Brew

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