

In re: Nuclear cost recovery clause.

DOCKET NO. 100009-EI

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DATED: August 16, 2010

COMMISSION
CLERK

**FLORIDA PUBLIC SERVICE COMMISSION'S RESPONSE TO
WHITE SPRINGS AGRICULTURAL CHEMICALS, INC
d/b/a PCS PHOSPHATE – WHITE SPRINGS'
FIRST SET OF INTERROGATORIES (NOS. 1 – 3)
TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION**

The Florida Public Service Commission responds to PCS Phosphate – White Springs' First Set of Interrogatories (Nos. 1-3) to as follows:

INTERROGATORIES

PCS Interrogatories Nos. 1, 2 and 3 to Staff refer to the following statement that appears on page 4 of the Direct Joint Testimony of William Coston and Kevin Carpenter submitted in this proceeding on July 20, 2010:

Given the uncertainties facing the company, keeping the project [LNP] progressing without further substantial investment is a reasonable approach at this time.

1. Please state whether an assessment of the reasonableness of PEF strategic decision making concerning the LNP project in light of the announced schedule delay is within the scope of the Staff audit of PEF project management internal controls for the Levy project.

RESPONSE: Yes, it is within the scope of the audit of PEF project management internal controls for the Levy project to assess the reasonableness of the company's decision-making process.

2. If the answer to Interrogatory No. 1 above is no, please state whether a Staff assessment of the reasonableness of PEF's strategic decision-making concerning the LNP project in light of the announced schedule delay is part of a separately defined scope of work performed in this docket.

RESPONSE: Not applicable

- a. Please specifically describe that scope of work.
- b. Please identify specifically the portions of Staff's testimony and exhibits that address that scope of work.
- c. Describe the analyses performed by or for Staff to reach the above-quoted statement in its testimony.

DO NOT WRITE IN THESE SPACES

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STAFF'S RESPONSE TO INTERROGATORIES OF
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- d. List all documents reviewed in assessing the reasonableness of PEF's approach to continuing the Levy project.
 - e. List all formal and informal communications (written, oral or electronic) with PEF, PEF consultants, or others, concerning the reasonableness of PEF's approach to continuing the Levy project. For each such communication, please provide:
 - i. The name and position of the person
 - ii. The date of the communication
 - iii. A summary of the topics discussed
 - iv. A list of all documents discussed or referenced
 - f. List the names and positions of all persons interviewed by Staff relating to Staff's assessment of the reasonableness of PEF's approach to continuing the Levy project. As to each such interview, please provide:
 - i. The date(s) and location(s)
 - ii. Topics discussed
 - iii. List of all documents discussed or referenced.
3. Will the NRC's issuance of a COL license for the Levy project resolve the "uncertainties" that PEF faces with respect to the project sufficiently to allow PEF to secure the joint owner participation that it seeks for the project? Please explain Staff's reasoning on this point.

RESPONSE: Staff did not interview any potential joint owners and therefore can not anticipate what factors will influence any decision to invest in the LNP project.

AFFIDAVIT

STATE OF FLORIDA)

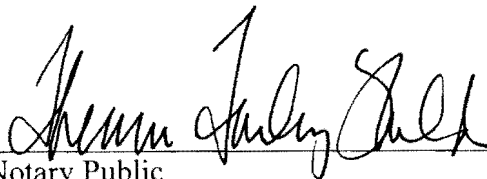
COUNTY OF LEON)

I hereby certify that on this 16th day of August, 2010, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared William Coston, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) 1-3 from PCS Phosphate to the staff of the Florida Public Service Commission in Docket No. 100009-EI, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 16th day of August, 2010.



William Coston, Affiant



Notary Public
State of Florida, at Large

My Commission Expires:



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of FLORIDA PUBLIC SERVICE COMMISSION'S RESPONSE TO PCS PHOSPHATE'S FIRST SET OF INTERROGATORIES TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION (NOS. 1-3) has been served by electronic and U.S. mail to James W. Brew and F. Alvin Taylor, Brickfield, Burchette, Ritts & Stone, P.C., 1025 Thomas Jefferson Street, NW, Eighth Floor, West Tower, Washington, DC 20007-5201, and that a true copy thereof has been furnished to the following by U. S. mail this 16TH day of August, 2010:

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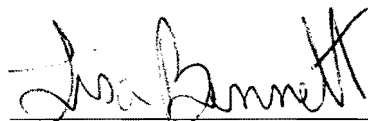
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