

**Marguerite McLean**

100002-EG

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**To:** Filings@psc.state.fl.us  
**Cc:** Jay Brew  
**Subject:** Docket No. 100002-EG - Energy Conservation Cost Recovery Clause - PCS Phosphate Prehearing Statement  
**Attachments:** PCS Prehearing Statement\_2010.pdf

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b. Docket No. 100002 -EG, Energy Conservation Cost Recovery Clause

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

d. Total Pages = 4

e. PCS Phosphate’s Prehearing Statement

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**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Energy Conservation Cost  
Recovery Clause**

**Docket No. 100002-EG  
Filed: October 13, 2010**

**PREHEARING STATEMENT OF  
WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.  
d/b/a PCS PHOSPHATE – WHITE SPRINGS**

Pursuant to the Florida Public Service Commission's February 26, 2010 *Order Establishing Procedure*, Order No. PSC-10-0118-PCO-EG ("*Procedural Order*"), White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs ("PCS Phosphate"), through its undersigned attorney, files its Prehearing Statement.

**A. APPEARANCES**

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**B. WITNESSES**

PCS Phosphate does not plan to call any witnesses at this time:

**C. EXHIBITS**

PCS Phosphate does not plan to offer any exhibits at this time:

**D. STATEMENT OF BASIC POSITION**

At this time, PCS Phosphate generally accepts and adopts the positions taken by the Florida Industrial Power Users Group (“FIPUG”).

**E. STATEMENT ON SPECIFIC ISSUES**

With respect to the various issues presented in this proceeding, PCS Phosphate takes no position regarding the resolution of the issues with respect to any utility other than Progress. PCS Phosphate takes the following positions on the specific issues presented below as they pertain to Progress:

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1:** What are the final conservation cost recovery true-up amounts for the period January 2009 through December 2009?

**Position:** No position at this time.

**ISSUE 2:** What are total conservation cost recovery amounts to be collected during the period January 2011 through December 2011?

**Position:** PCS Phosphate accepts and adopts the position of FIPUG.

**ISSUE 3:** What are the conservation cost recovery factors for the period January 2011 through December 2011?

**Position:** PCS Phosphate accepts and adopts the position of FIPUG.

**ISSUE 4:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

**Position:** PCS Phosphate accepts and adopts the position of FIPUG.

**F. STIPULATED ISSUES**

PCS Phosphate is not a party to any stipulated issues.

**G. PENDING MOTIONS**

None.

**H. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY**

None.

**I. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT**

None at this time.

**J. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE**

There are no requirements of the *Procedural Order* with which PCS Phosphate cannot comply.

Respectfully submitted the 13th day of October, 2010.

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

*s/ James W. Brew*

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*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 has been furnished by electronic mail and/or U.S. Mail this 13th day of October 2010 to the following:

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