

Crystal Card

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Subject: FPSC Docket 130007-EI - PCS Phosphate's Prehearing Statement
Attachments: PCS Prehearing Statement_2013_FINAL.pdf

a. Person responsible for filing

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b. Docket No. 130007-EI, In Re: Environmental Cost Recovery Clause

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

d. Total Pages = 5

e. PCS Phosphate's Prehearing Statement

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost)	Docket No. 130007-EI
Recovery Clause)	Filed: October 7, 2013
_____)	

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

Pursuant to the Florida Public Service Commission’s February 4, 2013 *Order Establishing Procedure*, Order No. PSC-13-0070-PCO-EI, and the March 7, 2013 *Order Modifying Order Establishing Procedure*, Order No. PSC-13-0115-PCO-EI (together, “*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 Office of Public Counsel (“OPC”).

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 Duke Energy Florida (“Duke”). PCS Phosphate takes the following positions on the specific issues presented below as they pertain to Duke:

GENERIC CONSERVATION COST RECOVERY ISSUES

Generic Environmental Cost Recovery Issues

ISSUE 1 What are the final environmental cost recovery true-up amounts for the period January 2012 through December 2012?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees and adopts the position of OPC.

ISSUE 2 What are the estimated/actual environmental cost recovery true-up amounts for the period January 2013 through December 2013?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees and adopts the position of OPC.

ISSUE 3 What are the projected environmental cost recovery amounts for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees and adopts the position of OPC.

ISSUE 4 What are the environmental cost recovery amounts, including true-up amounts, for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees and adopts the position of OPC.

ISSUE 5 What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees and adopts the position of OPC.

ISSUE 6 What are the appropriate jurisdictional separation factors for the projected period January 2014 through December 2014?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees and adopts the position of OPC.

ISSUE 7 What are the appropriate environmental cost recovery factors for the period January 2014 through December 2014 for each rate group?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees and adopts the position of OPC.

ISSUE 8 What should be the effective date of the new environmental cost recovery factors for billing purposes?

PCS Phosphate: With respect to Duke, PCS Phosphate agrees and adopts the position of OPC.

Company Specific Environmental Cost Recovery Issues

ISSUE 12 Should the Commission approve DEF's Review of Integrated Clean Air Compliance Plan as reasonable?

PCS Phosphate: PCS Phosphate agrees and adopts the position of OPC.

ISSUE 13 Should the Commission approve modification of DEF's previously approved Integrated Clean Air Compliance Program to encompass alternative coal trials associated with the Crystal River Units 1 and 2 MATS compliance project, such that the costs associated with such activities may be recovered through the ECRC?

PCS Phosphate: PCS Phosphate agrees and adopts the position of OPC.

ISSUE 14 Should the Commission approve DEF's petition for approval of the Revised Effluent Limitations Guidelines and Standards Project and recovery of the associated cost through the ECRC?

PCS Phosphate: PCS Phosphate agrees and adopts the position of OPC.

ISSUE 15 How should the costs associated with DEF's proposed Revised Effluent Limitations Guidelines and Standards Project be allocated to the rate classes?

PCS Phosphate: PCS Phosphate agrees and adopts the position of OPC.

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 7th day of October, 2013.

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 has been furnished by electronic mail and/or U.S. Mail this 7th day of October 2013 to the following:

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