BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery clause.)	Docket No. 160002-EG
)	Filed: October 4, 2016

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

Pursuant to the Florida Public Service Commission's Order No. PSC-16-0102-PCO-EG, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs ("PCS Phosphate"), through its undersigned attorneys, files its Prehearing Statement in the above matter.

A. APPEARANCES

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B. <u>WITNESSES</u>

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

C. <u>EXHIBITS</u>

PCS Phosphate does not plan to offer any exhibits at this time, but may introduce exhibits during the course of cross-examination.

D. <u>STATEMENT OF BASIC POSITION</u>

PCS Phosphate generally adopts the positions taken by the Florida Office of Public Counsel ("OPC").

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E. <u>STATEMENT ON SPECIFIC ISSUES</u>

GENERIC CONSERVATION COST RECOVERY ISSUES

DUKE ENERGY FLORIDA

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2015 through December 2015?

PCS Phosphate: PCS agrees with the Office of Public Counsel.

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2017 through December 2017?

PCS Phosphate: No position at this time.

ISSUE 3: What are the conservation cost recovery factors for the period January 2017 through December 2017?

PCS Phosphate: No position at this time.

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

PCS Phosphate: No position.

COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

TAMPA ELECTRIC COMPANY

ISSUE 5: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2017 through December 2017?

PCS Phosphate: No position.

<u>ISSUE 6:</u> What are the residential Price Responsive Load Management (RSVP-1) rate tiers for Tampa Electric Company for the period January 2017 through December 2017?

PCS Phosphate: No position.

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GENERIC ISSUES

Should the Commission approve revised tariffs reflecting the energy conservation cost recovery factors determined to be appropriate in this proceeding?

PCS Phosphate: No position.

F. <u>PENDING MOTIONS</u>

None.

G. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

H. OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT

None at this time.

I. REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE

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

Respectfully submitted

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 $PCS\ Phosphate-White\ Springs$

Dated: October 4, 2016

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prehearing Statement of PCS Phosphate has

been furnished by electronic mail and/or U.S. Mail this 4th day of October 2016 to the following:

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