

4. PCS Phosphate is a manufacturer of fertilizer products with plants and operations located within Duke Energy Florida's ("DEF" or "Duke") electric service territory. PCS Phosphate receives service under various PEF rate schedules.

5. Statement of Affected Interests. The Commission is considering whether and how the state's generation-owning electric utilities should continue to conduct fuel hedging practices. PCS Phosphate is a large customer of Duke that has been charged the costs of Duke's historic hedging activities through the fuel charge, and also bears the risks of fuel cost volatility in future base rate and fuel clause recoveries. Consequently, PCS Phosphate will be directly and substantially affected by the outcome of these proceedings. PCS Phosphate has taken positions on utility hedging practices in prior fuel clause proceedings and actively participated in the fuel hedging workshops.

6. Disputed Issues of Material Fact. PCS Phosphate anticipates that disputed issues of material fact will be identified in the continuing course of these proceedings. Disputed issues of material fact currently include, but are not limited to, the following:

- a. Should hedging be discontinued?
- b. What changes, if any, should be made to current utility hedging practices?
- c. Has hedging benefitted customers, and if so, how has it benefitted customers?
- d. Should the Commission engage in rulemaking related to hedging?

7. Disputed Legal Issues. PCS Phosphate anticipates that disputed legal issues may be identified in the course of these proceedings, and will include whether the goals and methods set forth in the Commission's order are consistent with applicable statutory provisions or adequately supported by the evidence in the record.

8. Statement of Ultimate Facts Alleged. Alleged ultimate facts include, but are not limited to, the following:

- (a) Is it in the best interests of utility customers, including PCS Phosphate, for utilities to continue hedging?
- (b) If utilities are directed to continue hedging, what hedging methods should be employed, and what metrics should utilities use to determine the timing and appropriate hedging levels?

PCS Phosphate anticipates that additional alleged ultimate facts will be identified in the course of these proceedings.

9. Laws Entitling Petitioner to Relief and Relation to Alleged Facts. The rules and statutes entitling PCS Phosphate to relief include but are not necessarily limited to the following: Sections 120.569 and 120.57(1), Florida Statutes, Sections 366.04 through 366.07, Florida Statutes; Sections 366.80 through 366.85 and 403.519, Florida Statutes, and Rule 25-22.039, Florida Administrative Code.

10. Relief. PCS Phosphate – White Springs requests that it be permitted to intervene as a full party in this docket.

WHEREFORE, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs respectfully requests that the Commission enter an order allowing it to intervene as a full party in this docket.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Petition to Intervene has been furnished by electronic mail and/or U.S. Mail this 4th day of April, 2017 to the following:

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