

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.) Docket No. 20170007-EI
_____) Filed: September 29, 2017

**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-2017-0106-PCO-EI, 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. 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, but may introduce exhibits during the course of cross-examination.

D. STATEMENT OF BASIC POSITION

PCS Phosphate generally accepts and adopts the positions taken by the Florida Office of Public Counsel (“OPC”) unless a differing position is stated with respect to an issue.

E. STATEMENT ON SPECIFIC ISSUES

GENERIC ISSUES

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2016 through December 2016?

PCS Phosphate: PCS takes no position with respect the true-up amounts proposed by Duke Energy Florida (“DEF”).

ISSUE 2: What are the estimated/actual environmental cost recovery true-up amounts for the period January 2017 through December 2017?

PCS Phosphate: PCS takes no position with respect the true-up amounts proposed by Duke Energy Florida (“DEF”).

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2018 through December 2018?

PCS Phosphate: PCS takes no position with respect the true-up amounts proposed by Duke Energy Florida (“DEF”).

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2018 through December 2018?

PCS Phosphate: PCS takes no position with respect the true-up amounts proposed by Duke Energy Florida (“DEF”).

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 2018 through December 2018?

PCS Phosphate: No position at this time.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2018 through December 2018?

PCS Phosphate: No position.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2018 through December 2018 for each rate group?

PCS Phosphate: No position.

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

PCS Phosphate: No position.

ISSUE 9: Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

PCS Phosphate: No position.

COMPANY SPECIFIC ISSUES

FLORIDA POWER & LIGHT

ISSUE 10A: Should FPL be allowed to recover, through the ECRC, prudently incurred costs, if any, associated with the June 20, 2016 Consent Order between FPL and the Florida Department of Environmental Protection and the October 2015 Consent Agreement between FPL and the Miami-Dade County Department of Environmental Resources Management (as amended by the August 15, 2016 Consent Agreement Addendum)?

PCS Phosphate: No position.

ISSUE 10B: Which costs, if any, associated with the June 20, 2016 Consent Order between FPL and the Florida Department of Environmental Protection and the October 2015 Consent Agreement between FPL and the Miami-Dade County Department of Environmental Resources Management (as amended by the August 15, 2016 Consent Agreement Addendum) were prudently incurred?

PCS Phosphate: No position.

ISSUE 10C: Should the costs FPL seeks to recover in this docket be considered part of its Turkey Point Cooling Canal Monitoring Plan project?

PCS Phosphate: No position.

ISSUE 10D: Is FPL's proposed allocation of costs associated with the June 20, 2016 Consent Order between FPL and the Florida Department of Environmental Protection and the October 2015 Consent Agreement between FPL and the Miami-Dade County Department of Environmental Resources Management (as amended by the August 15, 2016 Consent Agreement Addendum) between O&M and capital appropriate? If not, what is the correct allocation of costs between O&M and capital?

PCS Phosphate: No position.

ISSUE 10E: How should the costs associated with the June 20, 2016 Consent Order between FPL and the Florida Department of Environmental Protection and the October 2015 Consent Agreement between FPL and the Miami-Dade County Department of Environmental Resources Management (as amended by the August 15, 2016 Consent Agreement Addendum) be allocated to the rate classes?

PCS Phosphate: No position.

TAMPA ELECTRIC COMPANY

ISSUE 11: How should revenues included in Tampa Electric's projected ECRC cost recovery amount for 2018 associated with Phase II of the company's coal combustion residuals compliance program ("CCR Program"), the approval of which is currently pending in Docket No. 20170168-EI, be treated for cost recovery purposes pending the final disposition of the company's petition in that docket?

PCS Phosphate: No position.

DUKE ENERGY FLORIDA

ISSUE 12A: Should the Commission find DEF's proposed 316(b) compliance project is reasonable and approve recovery of the related costs through the ECRC?

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

ISSUE 12B: How should the costs associated with DEF's proposed 316(b) compliance Project be allocated to the rate classes?

PCS Phosphate: No position.

ISSUE 12C: Should the Regulatory Asset Treatment of the Alderman Road Fence be approved?

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

F. PENDING MOTIONS

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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Dated: September 29, 2017

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prehearing Statement of PCS Phosphate has been furnished by electronic mail this 29th of September, 2017, to the following:

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