

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery
Clause.

DOCKET NO.: 20180009-EI

FILED: July 12, 2018

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

Pursuant to the Florida Public Service Commission’s *Order Establishing Procedure*, Order No. PSC-2018-0074-PCO-EI, issued February 09, 2018, White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“PCS Phosphate”), through its undersigned attorney, hereby submit this Prehearing Statement.

A. APPEARANCES

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B. WITNESSES

PCS Phosphate will sponsor no witnesses.

C. EXHIBITS

NONE

D. STATEMENT OF BASIC POSITION

In this docket, the proposed costs for recovery concern the final installment of the seven-year amortization of the abandoned Crystal River Unit 3 uprate project. Recovery of those costs

through the Nuclear Cost Recovery Clause is authorized by the *Second Revised and Restated Stipulation and Settlement Agreement* approved in Order PSC-2017-0451-AS-EI. As a signatory to that Agreement, PCS Phosphate accordingly agrees that all issues for Duke Energy Florida, Inc. may be addressed as a Type 2 stipulation. PCS Phosphate agrees with the Office of Public Counsel (“OPC”) that the parties should stipulate a transition or closeout statement.

E. STATEMENT OF FACTUAL ISSUES AND POSITIONS

With respect to the various issues presented in this proceeding, PCS Phosphate takes the following positions on the specific issues presented below.

Duke Energy Florida, LLP

Issue 1: What jurisdictional amounts should the Commission approve as DEF’s actual 2017 prudently incurred costs for the Crystal River Unit 3 Uprate Project?

PCS Phosphate: No position.

Issue 2: What jurisdictional amounts should the Commission approve as reasonably estimated 2018 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

PCS Phosphate: No position.

Issue 3: What jurisdictional amounts should the Commission approve as reasonably projected 2019 exit and wind down costs and carrying costs for the Crystal River Unit 3 Uprate Project?

PCS Phosphate: No position.

Issue 4: What is the total jurisdictional amount for the Crystal River Unit 3 Uprate Project to be included in establishing DEF’s 2019 Capacity Cost Recovery Clause Factor?

PCS Phosphate: No position.

Issue 5: Is there a need, pursuant to Paragraph 9 of the 2017 Second Revised and Restated Stipulation and Settlement Agreement, approved in Order No. PSC-2017-0451-AS-EU, for DEF to participate in the 2019 NCRC Docket?

PCS Phosphate: No position at this time pending execution of an acceptable transition stipulation among the parties.

F. STIPULATED ISSUES

As stated above, PCS Phosphate is in agreement that the Duke Energy Florida, Inc., issues may be disposed of as a Type 2 stipulation, including a transition stipulation, if all parties are in agreement. There are no other issues that have been stipulated at this time.

G. PENDING MOTIONS

None.

H. STATEMENT OF PARTY'S PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

I. OBJECTIONS TO QUALIFICATION OF WITNESSES AS AN EXPERT

None at this time.

J. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

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

Respectfully submitted this 12th day of July, 2018.

STONE MATTHEIS XENOPOLOUS & BREW, PC

/s/ James W. Brew

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CERTIFICATE OF SERVICE
Docket No. 20180009-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 12th day of July, 2018, to the following:

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