

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for a limited proceeding to approve)
First solar base rate adjustment, by Duke) Docket No. 20180149-EI
Energy Florida, LLC.) Filed: March 7, 2019
_____)

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

Pursuant to the Florida Public Service Commission’s *Order Establishing Procedure*, Order No. PSC-2018-0505-PCO-EI, issued October 19, 2018, 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

James W. Brew
Laura A. Wynn
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007
(202) 342-0800
(202) 342-0807 (fax)
Email: jbrew@smxblaw.com
laura.wynn@smxblaw.com

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 supports Duke Energy Florida's first solar base rate adjustment filing to the extent that it conforms with the terms of the 2017 Second Revised and Restated Stipulation and Settlement Agreement (2017 Second RRSSA), approved by the Commission in Order No. PSC-2017-0451-AS-EU, issued November 20, 2017. With regard to issues of reasonableness and cost-effectiveness of "the cost the components, engineering and construction for any solar project constructed or acquired by DEF," as stated in Paragraph 15a of the 2017 Second RRSSA, PCS Phosphate notes that the burden of demonstrating the reasonableness of such costs for rate-setting purposes lies with Duke Energy Florida, the 2017 Second RRSSA does not create a presumption of prudence, and PCS 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

ISSUE 1: Are the projected installed costs of each of the Hamilton and Columbia projects proposed by DEF within the Installed Cost Cap of \$1,650 per kWac pursuant to subparagraph 15(a) of the 2017 Second RRSSA?

PCS Phosphate: Agree with OPC.

ISSUE 2: Are the Hamilton and Columbia Solar Projects proposed by DEF cost effective pursuant to subparagraph 15(c) of the 2017 Second RRSSA?

PCS Phosphate: Agree with OPC.

ISSUE 3: Are the Hamilton and Columbia Solar Projects proposed by DEF needed pursuant to subparagraph 15(c) of the 2017 Second RRSSA?

PCS Phosphate: Agree with OPC.

ISSUE 4: Are the Hamilton and Columbia Solar Projects otherwise in compliance with the Terms of Paragraph 15 of the 2017 Second RRSSA?

PCS Phosphate: Agree with OPC.

ISSUE 5: What is the annual revenue requirement associated with DEF's Hamilton Project?

PCS Phosphate: Agree with OPC.

ISSUE 6: What is the annual revenue requirements associated with DEF's Columbia Project?

PCS Phosphate: Agree with OPC.

ISSUE 7: What are the appropriate base rates needed to collect the estimated annual revenue requirement for the Columbia Project?

PCS Phosphate: Agree with OPC.

ISSUE 8: Should the Commission modify the tariffs and associated base rates for the Hamilton Project approved in Order No. PSC-2018-0559-FOF-EI based on the Commission's decision in Issue 5?

PCS Phosphate: Agree with OPC.

ISSUE 9: Should the Commission give staff administrative authority to approve tariffs and associated base rates reflecting the Commission's decision on the Columbia Project in Issue 6

PCS Phosphate: Agree with OPC.

ISSUE 10: What should be the effective date of the Columbia Project tariffs?

PCS Phosphate: Agree with OPC.

ISSUE 11: Should the docket be closed?

PCS Phosphate: No position.

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,

STONE MATTHEIS XENOPOULOS & BREW, PC

/s/ James W. Brew

James W. Brew

Laura A. Wynn

1025 Thomas Jefferson Street, NW

Eighth Floor, West Tower

Washington, D.C. 20007

(202) 342-0800

(202) 342-0807 (fax)

E-mail: jbrew@smxblaw.com

laura.wynn@smxblaw.com

*Attorneys for White Springs Agricultural Chemicals, Inc.
d/b/a PCS Phosphate – White Springs*

Dated: March 7, 2019

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 7th of March 2019, to the following:

Dianne M. Triplett
Duke Energy
299 First Avenue North
St. Petersburg FL 33701
Dianne.triplett@duke-energy.com

Matthew R. Bernier
Duke Energy
106 East College Avenue, Suite 800
Tallahassee FL 32301-7740
matthew.bernier@duke-energy.com

JR Kelly/ P. Christensen/ C. Rehwinkel
Office of General Counsel
Florida Public Service Commission
christensen.patty@leg.state.fl.us
kelly.jr@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Jon C. Moyle, Jr.
Florida Industrial Power Users Group
c/o Moyle Law Firm, PA
118 North Gadsden Street
Tallahassee FL 32301
jmoyle@moylelaw.com

Jennifer Crawford/Johana Nieves/Lauren
Davis
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
ladavis@psc.state.fl.us
jcrawford@psc.state.fl.us
jnieves@psc.state.fl.us

/s/ Laura A. Wynn