

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost recovery clause)
_____) Docket No. 20200007-EI
) Filed: October 9, 2020

**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-2020-0044-PCO-EI, issued January 31, 2020, as modified by *First Order Modifying Orders Establishing Procedure*, Order No. PSC-2020-0123-PCO-PU, issued April 23, 2020, 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 adopts the positions taken by the Florida Office of Public Counsel (“OPC”) unless a differing position is specifically stated.

E. STATEMENT ON SPECIFIC ISSUES

GENERIC ENVIRONMENTAL COST RECOVERY ISSUES

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2019 through December 2019?

PCS Phosphate: Agree with OPC.

ISSUE 2: What are the estimated/actual environmental cost recovery true-up amounts for the period January 2020 through December 2020?

PCS Phosphate: Agree with OPC.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2021 through December 2021?

PCS Phosphate: Agree with OPC.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2021 through December 2021?

PCS Phosphate: Agree with OPC.

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 2021 through December 2021?

PCS Phosphate: Agree with OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2021 through December 2021?

PCS Phosphate: Agree with OPC.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2021 through December 2021 for each rate group?

PCS Phosphate: Agree with OPC.

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

PCS Phosphate: Agree with OPC.

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: Agree with OPC.

ISSUE 10: Should this docket be closed?

PCS Phosphate: No position.

COMPANY SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES

Duke Energy Florida, LLC:

ISSUE 11: Should the Commission approve DEF's Anclote and Bartow Stations 316(b) Rule Compliance Plan Projects for cost recovery through the Environmental Cost Recovery Clause?

PCS Phosphate: PCS agrees that these are the types of projects normally recovered under the Environmental Cost Recovery Clause. The only costs of the 316(b) Anclote and Bartow projects that DEF has included in this case are the cost of the studies DEF prepared as part of its NPDES renewal submission. While that renewal is pending, clause recovery of any subsequent project costs would be speculative. Further, DEF continues to bear the burden of proving the prudence of any subsequent project costs.

ISSUE 12: How should any approved Environmental Cost Recovery Clause costs associated with DEF's Anclote and Bartow Stations 316(b) Rule Compliance Plan Projects be allocated to the rate classes?

PCS Phosphate: Agree with OPC.

Florida Power & Light Company:

ISSUE 13: Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed Power Plant Intake Protected Species Project?

PCS Phosphate: No position.

ISSUE 14: How should any approved Environmental Cost Recovery Clause costs associated with FPL's proposed Power Plant Intake Protected Species Project be allocated to the rate classes?

PCS Phosphate: No position.

ISSUE 15: Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modification to its Turkey Point Cooling Canal Monitoring Plan Project?

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 Orders with which PCS Phosphate cannot comply.

Respectfully submitted,

STONE MATTHEIS XENOPOULOS & BREW, PC

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Dated: October 9, 2020

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 9th of October 2020, to the following:

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