

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy conservation cost recovery) Docket No. 20220002-EG
clause) Filed: October 7, 2022
_____)

**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-2022-0053-PCO-EG, issued February 7, 2022, 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

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2021 through December 2021?

PCS Phosphate: Agree with OPC.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2022 through December 2022?

PCS Phosphate: Agree with OPC.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded in the period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 5: What are the conservation cost recovery factors for the period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 6: What should be the effective date of the new conservation cost recovery factors for billing purposes?

PCS Phosphate: Agree with OPC.

ISSUE 7: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and energy conservation cost recovery factors determined to be appropriate in this proceeding?

PCS Phosphate: Agree with OPC.

COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES

ISSUE 8: What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2023 through December 2023?

PCS Phosphate: No position.

ISSUE 9: What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2023 through December 2023?

PCS Phosphate: No position

CLOSE THE DOCKET ISSUE

ISSUE 10: Should this 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 Orders with which PCS Phosphate cannot comply.

Respectfully submitted,

STONE MATTHEIS XENOPOULOS & BREW, PC

/s/ James W. Brew

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*Attorneys for White Springs Agricultural Chemicals, Inc.
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Dated: October 7, 2022

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 October 2022, to the following:

<p>Richard Gentry/P. Christensen/C. Rehwinkel/M. Wessling Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399 christensen.patty@leg.state.fl.us rehwinkel.charles@leg.state.fl.us gentry.richard@leg.state.fl.us wessling.mary@leg.state.fl.us</p>	<p>Matthew R. Bernier/Robert L. Pickels/Stephanie A. Cuello Duke Energy 106 East College Avenue, Suite 800 Tallahassee FL 32301-7740 FLRegulatoryLegal@duke-energy.com matthew.bernier@duke-energy.com robert.pickels@duke-energy.com stephanie.cuello@duke-energy.com</p>
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