

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost recovery clause)
_____) Docket No. 20230007-EI
) Filed: October 6, 2023

**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-2023-0088-PCO-EI, issued February 15, 2023, as modified by the *First Order Modifying Order Establishing Procedure*, Order No. PSC-2023-0099-PCO-EI, issued February 28, 2023. 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 2022 through December 2022?

PCS Phosphate: Agree with OPC.

ISSUE 2: What are the actual/estimated environmental cost recovery true-up amounts for the period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2024 through December 2024?

PCS Phosphate: Agree with OPC.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2024 through December 2024??

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 2024 through December 2024?

PCS Phosphate: Agree with OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2024 through December 2024?

PCS Phosphate: No position.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2024 through December 2024 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 CONSERVATION COST RECOVERY ISSUES

Florida Power & Light Company (FPL):

ISSUE 11: Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modification to its St. Lucie Turtle Nets Project?

PCS Phosphate: No position.

ISSUE 12: Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modification to its Solar Site Avian Monitoring and Reporting Project?

PCS Phosphate: No position.

Duke Energy Florida, LLC (DEF):

ISSUE 13: Should the Commission approve DEF's Reclaimed Water Interconnection Project for cost recovery through the ECRC?

PCS Phosphate: Agree with OPC.

ISSUE 14: How should the approved costs related to DEF's Reclaimed Water Interconnection Project be allocated to the rate classes?

PCS Phosphate: Agree with OPC.

ISSUE 15: Should the Commission approve DEF's Lead and Copper Rule Project for cost recovery through the ECRC?

PCS Phosphate: Agree with OPC.

ISSUE 16: How should the approved costs related to DEF's Lead and Copper Rule Project be allocated to the rate classes?

PCS Phosphate: Agree with OPC.

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 6, 2023

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 6th of October 2023, to the following:

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