

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost recovery clause)
_____) Docket No. 20240007-EI
) Filed: October 11, 2024

**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-2024-0031-PCO-EI, issued February 6, 2024, as modified by the *First Order Modifying Order Establishing Procedure*, Order No. PSC-2024-0215-PCO-EI, issued June 20, 2024. 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 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 2: What are the estimated/actual environmental cost recovery true-up amounts for the period January 2024 through December 2024?

PCS Phosphate: Agree with OPC.

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2025 through December 2025?

PCS Phosphate: Agree with OPC.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2025 through December 2025?

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 2025 through December 2025?

PCS Phosphate: Agree with OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2025 through December 2025?

PCS Phosphate: No position.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2025 through December 2025 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

Duke Energy Florida, LLC (“DEF”):

ISSUE 11: Should the Commission approve DEF’s Citrus Combined Cycle (CCC) Water Treatment System Project for cost recovery through the ECRC?

PCS Phosphate: Agree with OPC.

ISSUE 12: How should the approved costs related to DEF’s CCC Water Treatment System be allocated to the rate classes?

PCS Phosphate: No position at this time.

Tampa Electric Company (“TECO”)

ISSUE 13: Should the Commission approve TECO’s Bayside 316 (a) Thermal Variance Study Project for cost recovery through the ECRC?

PCS Phosphate: No position.

ISSUE 14: How should the approved costs related to TECO’s Bayside (a) Thermal Variance Study Project be allocated to the rate classes?

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 11, 2024

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 11th of October 2024, to the following:

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