

In re: Nuclear cost recovery clause.

DOCKET NO. 100009-EI

10 AUG 16 PM 3:27

DATED: August 16, 2010

COMMISSION  
CLERK

**FLORIDA PUBLIC SERVICE COMMISSION'S RESPONSE TO  
WHITE SPRINGS AGRICULTURAL CHEMICALS, INC  
d/b/a PCS PHOSPHATE – WHITE SPRINGS'  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION**

The Florida Public Service Commission responds to PCS Phosphate – White Springs' First Request for Production of Documents as follows:

**DOCUMENTS**

PCS Request for Documents Nos. 1, 2, 3, 4 and 5 to Staff refer to the following statement that appears on page 4 of the Direct Joint Testimony of William Coston and Kevin Carpenter submitted in this proceeding on July 20, 2010:

*Given the uncertainties facing the company, keeping the project [LNP] progressing without further substantial investment is a reasonable approach at this time.*

1. Please provide all documents prepared by or for Staff that evaluate PEF's proposed approach to the Levy project.

**RESPONSE:** See the following: (1) confidential, unredacted Document No. 05699-10, which consists of two DVDs, and Document No. 06023-10, which consists of one CD, provided by the Commission Clerk to PCS on August 12, 2010; (2) redacted audit workpapers provided by Staff to PCS on CD at the Prehearing Conference on August 11, 2010; and (3) the attached redacted workpapers prepared by Staff.

2. Please provide all documents prepared by or for Staff that address PEF's "key assumptions" concerning its proposed approach for continuing the Levy project (see Exhibit CC-1, p. 3).

**RESPONSE:** See the following: (1) confidential, unredacted Document No. 05699-10, which consists of two DVDs, and Document No. 06023-10, which consists of one CD, provided by the Commission Clerk to PCS on August 12, 2010; (2) redacted audit workpapers provided by Staff to PCS on CD at the Prehearing Conference on August 11, 2010; and (3) the attached redacted workpapers prepared by Staff.

3. Please provide all Staff documents that address expected consumer rate impacts of the LNP project in light of the announced schedule delay.

DOCUMENT RECEIVED

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FPSC-DOCUMENTS CLERK

**RESPONSE:** Staff did not analyze the expected consumer rate impacts of the LNP project in light of the announced schedule delay.

4. Please provide all Staff documents that address the expected effect of the announced LNP schedule delay on joint ownership in the project.

**RESPONSE:** See the response to Data Request 1, question 29.

5. Please provide all Staff documents that address the reasonableness of PEF's revised cost and schedule estimates for the Levy project based on the announced schedule delay.

**RESPONSE:** Staff did not analyze the reasonableness of the revised cost and schedule estimates for the Levy project.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U. S. mail this 16<sup>TH</sup> day of August, 2010:

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