## **Eric Fryson**

From:	Al Taylor <al.taylor@bbrslaw.com></al.taylor@bbrslaw.com>
Sent:	Monday, May 06, 2013 5:55 PM
То:	Filings@psc.state.fl.us
Cc:	Bernier, Matthew R.; Jay Brew; john.burnett@pgnmail.com; Gamba, Blaise N.; John T. LaVia (jlavia@gbwlegal.com); Michael Lawson; Paul Lewis Jr. (paul.lewisjr@pgnmail.com); Jon C. Moyle Jr. (jmoyle@moylelaw.com); rehwinkel.charles@leg.state.fl.us; Erik L. Sayler (sayler.erik@leg.state.fl.us); Lee Eng Tan; Diane Triplett (dianne.triplett@pgnmail.com); Walls, J. Michael; Robert Scheffel Wright (swright@gbwlegal.com); Keino Young; 'Woods, Monica'; Michael Lawson; Caroline Klancke
Subject:	FPSC Docket 100437-EI PCS Phosphate's Statement in Support
Attachments:	Reconsideration Supporting Comments FINAL.pdf

a. Person responsible for filing

James W. Brew Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson Street, N.W. Eighth Floor West Tower Washington, D.C. 20007 Tel: (202) 342-0800 Fax: (202) 342-0807 jwb@bbrslaw.com

- b. Docket No. 100437 -EI, Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.
- c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate White Springs
- d. Total Pages = 2
- e. PCS Phosphate's Statement in Support

## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.

DOCKET NO.: 100437-EI

FILED: May 6, 2013

## STATEMENT IN SUPPORT OF WHITE SPRINGS

On May 6, 2013, the Office of Public Counsel ("OPC") filed a Motion for Reconsideration of the Commission's Third Order Establishing Procedure in this proceeding and a separate Request for Oral Argument regarding the motion for reconsideration. As OPC explains, the schedule established in this Order does not provide opportunity for intervenors to address the substantial and complex issues still to be addressed in this proceeding. There is significant potential harm facing Duke Energy Florida's ("DEF") ratepayers that would result from a rushed examination of the prudence of DEF's action, and no detriment to DEF or ratepayers from establishing a process that will allow sufficient opportunity for discovery and the development of a full record. Accordingly, White Springs Agricultural Chemicals, Inc., d/b/a PCS Phosphate fully supports OPC's motion for reconsideration and joins its requests for oral argument to discuss these critical issues before the Commission.

> <u>s/James W. Brew</u> James W. Brew F. Alvin Taylor Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007-5201

Attorneys for White Springs Agricultural Chemicals, Inc. d/b/a/ PCS Phosphate – White Springs

> 02527 MAY-7 = FPSC-COMMISSION ELERK

POOL HENT NEWSTOLDAYS

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic mail and/or U.S. Mail on this 6<sup>th</sup> day of May 2013 to the following:

John T. Burnett Progress Energy Service Company, LLC P.O. Box 14042 St. Petersburg, FL 33733-4042

Mr. Paul Lewis, Jr. Progress Energy Florida, Inc. 106 East College Ave, Suite 800 Tallahassee, FL 32301-7740

J. Michael Walls/Blaise N. Gamba Carlton Fields Law Firm P.O. Box 3239 Tampa, FL 33607-5736

Charles Rehwinkle/J.R. Kelly Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 8 12 Tallahassee, FL 32399-1400 Jon C. Moyle, Jr. Florida Industrial Power Users Group 118 North Gadsden Street Tallahassee, FL 32301

Caroline Klancke/Keino Young Michael Lawson 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Robert Scheffel Wright/ John T. LaVia c/o Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308

Matthew Bernier Carlton Fields Law Firm 215 S. Monroe Street, Ste 500 Tallahassee, FL 32301

<u>/s/ Al Taylor</u> F. Alvin Taylor