FILED 10/4/2017 DOCUMENT NO. 08107-2017 FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery clause.

Docket No. 20170002-EG Filed: October 4, 2017

PREHEARING STATEMENT OF WHITE SPRINGS AGRICULTURAL CHEMICALS, INC. d/b/a PCS PHOSPHATE – WHITE SPRINGS

Pursuant to the Florida Public Service Commission's Order No. PSC-2017-0111-PCO-EG,

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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. <u>APPEARANCES</u>

James W. Brew Laura A. Wynn Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, D.C. 20007 (202) 342-0800 (202) 342-0807 (fax) Email: jbrew@smxblaw.com laura.wynn@smxblaw.com

B. <u>WITNESSES</u>

PCS Phosphate does not plan to call any witnesses at this time.

C. <u>EXHIBITS</u>

PCS Phosphate does not plan to offer any exhibits at this time, but may introduce exhibits

during the course of cross-examination.

D. <u>STATEMENT OF BASIC POSITION</u>

PCS Phosphate generally adopts the positions taken by the Florida Office of Public

Counsel ("OPC") unless a differing position is specifically stated.

E. <u>STATEMENT ON SPECIFIC ISSUES</u>

GENERIC CONSERVATION COST RECOVERY ISSUES

DUKE ENERGY FLORIDA

- **<u>ISSUE 1:</u>** What are the final conservation cost recovery adjustment true-up amounts for the period January 2016 through December 2016?
 - **PCS Phosphate:** No position at this time.
- **<u>ISSUE 2:</u>** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2017 through December 2017?
 - **PCS Phosphate:** No position at this time.
- **<u>ISSUE 3:</u>** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2018 through December 2018?
 - **PCS Phosphate:** No position at this time.
- **<u>ISSUE 4:</u>** What are the total conservation cost recovery amounts to be collected during the period January 2018 through December 2018?

PCS Phosphate: No position.

<u>ISSUE 5:</u> What are the conservation cost recovery factors for the period January 2018 through December 2018?

PCS Phosphate: No position.

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

PCS Phosphate: No position.

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

PCS Phosphate: No position.

COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES

TAMPA ELECTRIC COMPANY

<u>ISSUE 8:</u> What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2018 through December 2018?

PCS Phosphate: No position.

<u>ISSUE 9:</u> What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2018 through December 2018?

PCS Phosphate: No position.

GULF POWER COMPANY

<u>ISSUE 10</u>: Should Gulf's proposed On Peak Demand credits and Critical Peak Demand charges for its Critical Peak Option under Gulf's Large Power Time of Use program be approved?

PCS Phosphate: No position.

<u>ISSUE 11:</u> Should the Commission approve Gulf's proposed modifications to its Residential Time of Use Pilot Program?

PCS Phosphate: No position.

F. <u>PENDING MOTIONS</u>

None.

G. <u>PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY</u>

None.

H. <u>OBJECTIONS TO QUALIFICATIONS OF WITNESS AS EXPERT</u>

None at this time.

I. <u>REQUIREMENTS OF ORDER ESTABLISHING PROCEDURE</u>

There are no requirements of the Procedural Order with which PCS Phosphate cannot

comply.

Respectfully submitted STONE MATTHEIS XENOPOULOS & BREW, PC /s/ James W. Brew James W. Brew Laura A. Wynn Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, D.C. 20007 (202) 342-0800 (202) 342-0807 (fax) E-mail: jbrew@smxblaw.com laura.wynn@smxblaw.com Attorneys for White Springs Agricultural Chemicals, Inc. d/b/a *PCS Phosphate – White Springs*

Dated: October 4, 2017

Prehearing Statement of PCS Phosphate Docket No. 20170002-EG Page 5

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 4th day of October 2017 to the following:

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/s/ Laura A. Wynn