

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm Protection Plan Cost Recovery) Docket No. 20220010-EI
Clause) Filed: October 7, 2022
_____)

**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-2022-0044-PCO-EG, issued January 28, 2022, as modified by the *First Order Revising Order Establishing Procedure*, Order No. PSC-2022-0111-PCO-EI, issued March 14, 2022, 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

DEF has filed for recovery of costs of its Storm Protection Plan (“SPP”), which was approved with modifications ordered by the Commission at its Agenda Conference held on October 4, 2022.¹ DEF’s proposed revenue requirement for 2023 is \$142.8 million, which is a 36% increase over its 2022 revenue requirement of \$105.3 million.² PCS generally supports the positions taken by the Office of Public Counsel (“OPC”) both in this docket and in the companion SPP matter (Docket No. 20220050-EI). In light of the need for DEF to make an amended filing to incorporate the SPP changes ordered by the Commission, PCS reserves its rights to revise its positions in this matter as necessary upon review of the DEF compliance filing.

E. STATEMENT ON SPECIFIC ISSUES

ISSUE 1: What are the final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2021 through December 2021?

PCS Phosphate: Agree with OPC.

ISSUE 2: What are the actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2022 through December 2022?

PCS Phosphate: Agree with OPC.

ISSUE 3: What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm Protection Plan Cost Recovery factors for the period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

¹

² See Order No. PSC-2021-0324-FOF-EI at 4 (Aug. 26, 2021).

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for the period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2023 through December 2023?

PCS Phosphate: Agree with OPC.

ISSUE 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2023 through December 2023 for each rate group?

PCS Phosphate: Agree with OPC.

ISSUE 8: What should be the effective date of the new Storm Protection Plan Cost Recovery Clause factors for billing purposes?

PCS Phosphate: Agree with OPC.

ISSUE 9: Should the Commission approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding?

PCS Phosphate: Agree with OPC.

ISSUE 10: Should this docket be closed?

PCS Phosphate: Agree with OPC.

COMPANY SPECIFIC STORM PROTECTION PLAN COST RECOVERY ISSUES

These issues will be added as they are developed.

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

/s/ James W. Brew

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Dated: October 7, 2022

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 7th of October 2022, to the following:

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