

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for a limited proceeding to approve )  
Second solar base rate adjustment, by Duke ) Docket No. 20190072-EI  
Energy Florida, LLC. ) Filed: June 14, 2019  
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**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-2019-0161-PCO-EI, issued May 3, 2019, 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**

Duke Energy Florida's second solar base rate adjustment filing must conform with the terms of the 2017 Second Revised and Restated Stipulation and Settlement Agreement (2017 Settlement), approved by the Commission in Order No. PSC-2017-0451-AS-EU, issued November 20, 2017. For rate-setting purposes, the burden of demonstrating the reasonableness of the costs of components, land acquisition, engineering and construction for any solar project constructed or acquired by DEF lies with Duke Energy Florida (see Paragraph 15a of the 2017 Settlement). PCS Phosphate further observes that it is incumbent upon DEF to demonstrate its need for the facilities built or acquired. The 2017 Settlement does not create a presumption of prudence in any of these matters. Additionally, the Commission should disallow from rate recovery any costs associated with the proposed projects which are not included in the current filing.

#### **E. STATEMENT ON SPECIFIC ISSUES**

**ISSUE 1:** Are the projected installed costs of the proposed Solar Projects (Trenton, Lake Placid, and DeBary) within the Installed Cost Cap of \$1,650 per kWac pursuant to subparagraph 15(a) of the 2017 Settlement?

**PCS Phosphate:** It appears these project costs are, on average, less than or equal to the Install Cost Cap of \$1,650/kWac pursuant to subparagraph 15(c) of the 2017 Settlement; however, to the extent that any costs are not fully reflected in the actual costs, this threshold compliance may not be met.

**ISSUE 2:** Are the proposed Solar Projects proposed by DEF cost effective pursuant to subparagraph 15(c) of the 2017 Settlement?

**PCS Phosphate:** No position at this time pending further evidence adduced at hearing. DEF bears the burden of proving cost effectiveness of any projects under subparagraph 15(c) of the 2017 Settlement and under Commission rules.

**ISSUE 3:** Are the Trenton, Lake Placid, and DeBary Solar Projects proposed by DEF needed pursuant to subparagraph 15(c) of the 2017 Settlement?

**PCS Phosphate:** No position at this time.

**ISSUE 4:** Are the Trenton, Lake Placid, and DeBary Solar Projects otherwise in compliance with the Terms of Paragraph 15 of the 2017 Settlement?

**PCS Phosphate:** No position at this time.

**ISSUE 5:** What is the annual revenue requirement associated with each of the proposed Solar Projects?

**PCS Phosphate:** No position at this time.

**ISSUE 6:** What are the appropriate base rates needed to collect the estimated annual revenue requirement for the proposed Trenton and Lake Placid Solar Projects, projected to be effective in the first billing cycle of January, 2020?

**PCS Phosphate:** No position at this time.

**ISSUE 7:** What are the appropriate base rates needed to collect the estimated annual revenue requirement for the proposed DeBary Solar Project, projected to be effective in the first billing cycle of April, 2020?

**PCS Phosphate:** No position at this time.

**ISSUE 8:** Should the Commission give staff administrative authority to approve revised tariffs reflecting the base rates increase for the Trenton and Lake Placid Solar Projects determined to be appropriate in this proceeding?

**PCS Phosphate:** No position at this time.

**ISSUE 9:** Should the Commission give staff administrative authority to approve revised tariffs reflecting the base rates increase for the DeBary Solar Project determined to be appropriate in this proceeding?

**PCS Phosphate:** No position at this time.

**ISSUE 10:** Should the docket be closed?

**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 Order with which PCS Phosphate cannot comply.

Respectfully submitted,

STONE MATTHEIS XENOPOULOS & BREW, PC

*/s/ James W. Brew*

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d/b/a PCS Phosphate – White Springs*

Dated: June 14, 2019

## 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 14th of June 2019, to the following:

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