

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery)
Clause) Docket No. 20210010-EI
) Filed: July 12, 2021
_____)

**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-2021-0083-PCO-EI, issued February 17, 2021, 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

In Order No. PSC-2021-0202-AS-EI, issued June 4, 2021, the Commission approved a multi-year base rate agreement for Duke Energy Florida, LLC (“Duke” or “DEF”). The agreement confirmed that all Storm Protection Plan costs eligible for recovery in the Storm Protection Plan Cost Recovery Clause (“SPPCRC”) were being removed from base rates and subject to recovery in the SPPCRC factor to be established in this docket. This rate setting change, along with increases in DEF storm protection plan spending, is producing a significant increase in the SPPCRC factor compared to the initial factor established for the year 2021. PCS has on-going concerns regarding the appropriate allocation of costs that are subject to recovery through this clause.

E. STATEMENT ON SPECIFIC ISSUES

GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES

ISSUE 1: What are the final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2020 through December 2020?

1A: TECO

PCS Phosphate: No position.

1B: DEF

PCS Phosphate: No position at this time.

1C: Gulf

PCS Phosphate: No position.

1D: FPL

PCS Phosphate: No position.

ISSUE 2: What are the actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2021 through December 2021?

1A: TECO
PCS Phosphate: No position.

1B: DEF
PCS Phosphate: No position at this time.

1C: Gulf
PCS Phosphate: No position.

1D: FPL
PCS Phosphate: No position.

ISSUE 3: What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2022 through December 2022?

1A: TECO
PCS Phosphate: No position.

1B: DEF
PCS Phosphate: No position at this time.

1C: Gulf
PCS Phosphate: No position.

1D: FPL
PCS Phosphate: No position.

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 2022 through December 2022?

1A: TECO
PCS Phosphate: No position.

1B: DEF
PCS Phosphate: No position at this time.

1C: Gulf
PCS Phosphate: No position.

1D: FPL
PCS Phosphate: No position.

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 2022 through December 2022?

PCS Phosphate: PCS agrees with OPC.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2022 through December 2022?

PCS Phosphate: PCS agrees with OPC.

ISSUE 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022 for each rate group?

PCS Phosphate: PCS reserves its position on the appropriate factors to be applied for each rate group pending evidence to be adduced at hearing.

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

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

ISSUE 10: Should this docket be closed?

PCS Phosphate: No position.

COMPANY SPECIFIC STORM PROTECTION PLAN COST RECOVERY ISSUES

FPL SPECIFIC ISSUES

ISSUE A: In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, what are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022?

PCS Phosphate: No position.

ISSUE B: How should the assumptions used to develop FPL's 2022 Storm Protection Plan Cost Recovery Clause factors approved in this proceeding be revised to reflect any changes or modifications adopted by the Commission in the 2021 Rate Case pending in Docket No. 20210015-EI?

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 Orders with which PCS Phosphate cannot comply.

Respectfully submitted,

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Dated: July 12, 2021

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 12th of July 2021, to the following:

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