

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Energy conservation cost recovery ) Docket No. 20210002-EG  
clause ) Filed: October 5, 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-2021-0075-PCO-EG, issued February 10, 2021, as modified by *First Order Modifying Order Establishing Procedure* No. PSC-2021-0208-PCOEG, issued on June 7, 2021, and as further modified by the *Second Order Modifying Order Establishing Procedure*, Order No. PSC-2021-0344-PCO-EG, issued September 15, 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**

PCS Phosphate generally adopts the positions taken by the Florida Office of Public Counsel (“OPC”) unless a differing position is specifically stated.

**E. STATEMENT ON SPECIFIC ISSUES**

**LIST OF ISSUES**

**ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the January 2020 through December 2020?

**PCS Phosphate:** Agree with OPC.

**ISSUE 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

**PCS Phosphate:** Agree with OPC.

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2022 through December 2022?

**PCS Phosphate:** Agree with OPC.

**ISSUE 4:** What is the total conservation cost recovery amounts to be collected during the period January 2022 through December 2022?

**PCS Phosphate:** Agree with OPC.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2022 through December 2022?

**PCS Phosphate:** Agree with OPC.

**ISSUE 6:** Should the Commission approve revised tariffs reflecting the conservation cost recovery amounts and establishing conservation cost recovery factors determined to be appropriate in this proceeding?

**PCS Phosphate:** Agree with OPC.

**ISSUE 7:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

**PCS Phosphate:** Agree with OPC.

## **COMPANY SPECIFIC CONSERVATION COST RECOVERY ISSUES**

### **Tampa Electric Company**

**ISSUE 8:** What is the Contracted Credit Value for the GSLM-2 and GSLM-3 rate riders for Tampa Electric Company for the period January 2022 through December 2022?

**PCS Phosphate:** No position.

**ISSUE 9:** What are the residential Price Responsive Load Management (RSVP -1) rate tiers for Tampa Electric Company for the period January 2022 through December 2022?

**PCS Phosphate:** No position.

## **CLOSE THE DOCKET ISSUE**

**ISSUE 10:** Should this 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 Orders with which PCS Phosphate cannot comply.

Respectfully submitted,

STONE MATTHEIS XENOPOULOS & BREW, PC

/s/ James W. Brew

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

Dated: October 5, 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 5th of October 2021, to the following:

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