

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost recovery clause )  
\_\_\_\_\_ ) Docket No. 20210007-EI  
 ) Filed: October 6, 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-2021-0078-PCO-EI, issued February 11, 2021, as modified by the *First Order Modifying Order Establishing Procedure*, Order No. PSC-2021-0210-PCO-EI, issued June 7, 2021, and the *Second Order Modifying Order Establishing Procedure*, Order No. PSC-2021-0338-PCO-EI, issued September 14, 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**

**GENERIC ENVIRONMENTAL COST RECOVERY ISSUES**

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

**PCS Phosphate:** Agree with OPC.

**ISSUE 2:** What are the estimated/actual environmental cost recovery true-up amounts for the period January 2021 through December 2021?

**PCS Phosphate:** Agree with OPC.

**ISSUE 3:** What are the projected environmental cost recovery amounts for the period January 2022 through December 2022?

**PCS Phosphate:** Agree with OPC.

**ISSUE 4:** What are the environmental cost recovery amounts, including true-up amounts, for the period January 2022 through December 2022?

**PCS Phosphate:** Agree with OPC.

**ISSUE 5:** What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2022 through December 2022?

**PCS Phosphate:** Agree with OPC.

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

**PCS Phosphate:** Agree with OPC.

**ISSUE 7:** What are the appropriate environmental cost recovery factors for the period January 2022 through December 2022 for each rate group?

**PCS Phosphate:** Agree with OPC.

**ISSUE 8:** What should be the effective date of the new environmental cost recovery factors for billing purposes?

**PCS Phosphate:** Agree with OPC.

**ISSUE 9:** Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

**PCS Phosphate:** Agree with OPC.

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

**PCS Phosphate:** No position.

## **COMPANY SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES**

### **Florida Power & Light Company (FPL):**

**ISSUE 11:** Should the Commission approve FPL's Miami-Dade Clean Water Recovery Center Project for cost recovery through the Environmental Cost Recovery Clause?

**PCS Phosphate:** No position.

**ISSUE 12:** How should any approved Environmental Cost Recovery Clause costs associated with FPL's Miami-Dade Clean Water Recovery Center Project be allocated to the rate classes?

**PCS Phosphate:** No position.

**ISSUE 13:** Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modification to its Turkey Point Cooling Canal Monitoring Plan Project?

**PCS Phosphate:** No position.

**ISSUE 14:** Should FPL be allowed to recover, through the ECRC, prudently incurred costs associated with its proposed modification to its Lowest Quality Water Source Project?

**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 6, 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 6th of October 2021, to the following:

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