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March 9, 1993

DEPOSIT TREAS REC DATE

MAR 1 [illegible]

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399

930256-WS

Re: Sanlando Utilities Corporation Petition for Limited Proceeding to Implement Water Conservation Plan (the "Petition")

Dear Mr. Tribble:

Enclosed are an original and fifteen (15) copies of the above referenced Petition along with a check in the amount of $2,250.00, payable to the Public Service Commission, in payment of the filing fee.

Sanlando Utilities Corporation is filing the Petition pursuant to PSC Order No. 92-1356-FOF-WS, issued on November 23, 1992, mandating that the Utility file a limited proceeding to implement the water conservation plan discussed in the Order.

If the Public Service Commission has any questions regarding the Petition or needs any other information in connection with the filing thereof, please contact either James Balletta of this office or me.

Yours very truly,

John F. Lowndes

JFL:JB:dkb
001080/26497
Enclosures

c: Mr. Lester N. Mandell
Mr. Robert A. Mandell
Mr. George H. Billings, Jr.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition of SANLANDO UTILITIES CORPORATION for a Limited Proceeding to Implement Water Conservation Plan

Docket No.: 930256-WS
Filed: 3-10-93

PETITION FOR LIMITED PROCEEDING
TO IMPLEMENT WATER CONSERVATION PLAN

SANLANDO UTILITIES CORPORATION (the "Utility"), by and through its undersigned attorneys, files this Petition with the Florida Public Service Commission (the "PSC") to implement a water conservation plan within its service area in Seminole County, Florida, pursuant to a Limited Proceeding under provisions of Section 367.0822, Florida Statutes. In support thereof, the Utility states the following:

1. The Utility is a Florida corporation, incorporated on September 12, 1969, and the address of its principal place of business is:

Sanlando Utilities Corporation
1105 Kensington Park Drive
Altamonte Springs, Florida 32701

2. The Utility is regulated by the PSC under the provisions of Chapter 367, Florida Statutes, and Section 25-30, Florida Administrative Code.

3. In PSC Order No. 23809, issued on November 27, 1990, the PSC requested that the Utility submit a plan detailing actions it would take to implement water conservation initiatives. In PSC Order No. 24920, issued on August 16, 1991, the Commission approved in part and denied in part the water conservation plan submitted by

the Utility. By PSC Order No. 92-1356-FOF-WS, issued on November 23, 1992, the PSC stated that the revised conservation plan submitted by the Utility on September 21, 1992 (the "Conservation Plan"), fulfilled the requirements of PSC Order Nos. 23809 and 24920 and further mandated the Utility to file a Limited Proceeding to implement the Conservation Plan.

4. Attached hereto and made a part hereof is a document entitled, "Proposed Water Reuse Program First Amendment dated January 31, 1993." This attachment is an Amendment and update of the Utility's Conservation Plan which was the subject of PSC Order No. 92-1356-FOF-WS, which has been amended in accordance with said Order. This attachment contains a detailed description of the Utility's Conservation Plan and sets forth descriptive narratives and schedules indicating its projected costs, revenues and time table, and the methodology for determining proposed rates and reduction in water consumption by the Utility's customers as a result of such rates.

5. If the Utility is permitted to implement the Conservation Plan, the Utility will design and construct a system to reuse a portion of the treated effluent generated by its Wekiva wastewater treatment plant. The system will consist of both on-site storage and pumping capabilities and off-site delivery facilities. The system will have the ability to deliver at least one million gallons per day on an annual average basis to three (3) golf courses within the Utility's service area and another 225,000 gallons per day to commercial users within the Utility's service

area which are in the vicinity of the main transmission routes to the respective golf courses. The three (3) golf courses are currently irrigated with on-site wells and have a combined estimated average daily withdrawal from the aquifer of one million gallons per day. The on-site wells are operated pursuant to Consumptive Use Permits issued by the St. John's River Water Management District. These permits indicate that St. John's River Water Management District will require the golf courses to stop withdrawing water from the aquifer and to use the treated wastewater when a reuse system is made available. The use by the three (3) golf courses of the Utility's effluent will result in an immediate and significant reduction in water resource withdrawal from Florida's diminishing potable water supply. Moreover, the Conservation Plan also will result in reduced usage of potable water by the Utility's customers.

6. The Conservation Plan proposes that the Utility raise the funds necessary to implement the Conservation Plan by increasing in a graduated manner the water rates it charges larger water users. In order to implement the Conservation Plan through increased water revenues, approximately TWO MILLION AND NO/100 DOLLARS ($2,000,000.00) in additional water revenues must be collected. The Utility proposes raising the TWO MILLION AND NO/100 DOLLARS ($2,000,000.00) necessary to implement the plan and construct the reuse facilities over approximately a four (4) year period of time by adopting during this period an inclining block water rate structure.

7. The graduated rate structure proposed in the Conservation Plan for all users (residential, multi-family, general service and bulk rate customers) will begin after the customer has used the first ten thousand (10,000) gallons in a month. The first ten thousand (10,000) gallons in a month will be charged at the Utility's existing gallonage charge of $.355 per thousand gallons of water (the rate established in PSC Docket No. 900338). For gallons used in a month in excess of the first 10,000 gallons, the charge will be increased as follows:

Gallons Per Month	Charge Per 1,000 Gallons
from 10,001 to 20,001	$.50
from 20,001 to 30,000	$.65
Over 30,000	$.85

The proposed increased rates shall hereinafter be referred to as the "Water Conservation Rates."

8. The water revenues received by the Utility through the Water Conservation Rates which are in excess of those water revenues necessary to provide the Utility with an amount equal to the fair rate of return permitted to the Utility by the PSC (the "Excess Revenues") will be deposited in an interest-bearing escrow account and will be used by the Utility solely for expenditures related to implementation of the Conservation Plan. The Utility does not intend to earn a profit on this project and any interest earned from the Excess Revenues escrow account will be used for the Conservation Plan. Upon the collection of Excess Revenues

necessary for the full implementation of the Conservation Plan, a determination will be made by the PSC for the disposition of any future Excess Revenues generated by the Water Conservation Rates. Alternatives might include a reduction in water rates or a continuation of the Water Conservation Rates for further expansion of the Conservation Plan.

9. Pursuant to PSC Order No. 23809, the Utility is required to use TWENTY-FIVE THOUSAND EIGHT AND NO/100 DOLLARS ($25,008.00) of its annual water revenues for expenses specifically related to water conservation. The Utility proposes to use such funds along with the Excess Revenues for the implementation of the Conservation Plan. The Utility has expended TWENTY-TWO THOUSAND ONE HUNDRED FORTY AND 25/100 DOLLARS ($22,140.25) in 1991 and TWENTY-SIX THOUSAND TWO HUNDRED SIXTY AND 41/100 DOLLARS ($26,260.41) in 1992 (for a total of FORTY-EIGHT THOUSAND FOUR HUNDRED AND 66/100 DOLLARS $48,400.66) towards developing the Conservation Plan and various public information segments regarding water conservation. The Utility requests that it be allowed to apply the remaining portion of the annual set-aside funds (ONE THOUSAND SIX HUNDRED FIFTEEN AND 34/100 DOLLARS $1,615.34) and such set aside funds in future years towards the costs it incurs in this proceeding and in the implementation of the Conservation Plan.

10. Attached to this Petition is a Memorandum of Law in support of the Utility's Petition herein.

WHEREFORE, the Utility petitions the PSC to approve the Conservation Plan, to approve the Water Conservation Rate structure set forth herein, to approve using the Excess Revenues received by the Utility to implement the Conservation Plan and to approve the use of the TWENTY-FIVE THOUSAND EIGHT AND NO/100 DOLLARS ($25,008.00) set aside required under PSC Order No. 23809 to implement the Conservation Plan.

Respectively submitted this 9th day of March, 1993.

John F. Lowndes, Esquire
Lowndes, Drosdick, Doster, Kantor,
& Reed, Professional Association
215 North Eola Drive
Post Office Box 2809
Orlando, Florida 32802
(407) 843-4600

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and 15 copies of the foregoing petition and all exhibits were filed with the Clerk of the Florida Public Service Commission this 9th day of March, 1993.

John F. Lowndes, Esquire

AFFIDAVIT

I, Lester N. Mandell, President of SANLANDO UTILITIES CORPORATION do solemnly swear that the facts stated in the foregoing Petition for Limited Proceeding to Implement Water Conservation Plan and all exhibits attached thereto are true and correct to the best of my knowledge and belief and that such statement of facts constitutes a complete statement of the matter to which it relates.

Lester N. Mandell,
President
Sanlando Utilities Corporation

STATE OF FLORIDA
COUNTY OF SEMINOLE

The foregoing instrument was acknowledged before me this 9th day of March, 1993, by Lester N. Mandell, as President of Sanlando Utilities Corporation, who is personally known to me ~~(or who has produced _____ as identification)~~ and who ~~did~~ (did not) take an oath.

SEAL

Signature: Donna J. Maddox
Name: DONNA J. MADDOX
Notary Public -
State of Florida
Commission No.: AA691539
My Commission Expires:

Notary Public, State of Florida
My Commission Expires Aug. 1, 1993
Bonded thru Troy Fain-Insurance Inc.

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MEMORANDUM OF LAW
IN SUPPORT OF PETITION FOR
LIMITED PROCEEDING TO IMPLEMENT
WATER CONSERVATION PLAN BY
SANLANDO UTILITIES CORP.

I. FACTS

Sanlando Utilities Corp. ("Sanlando") is filing a Petition For Limited Proceeding with the Public Service Commission ("PSC"), to seek permission to change its water rate structure to a structure that will enable it to charge a higher rate per 1,000 gallons per month as the usage by a particular customer increases. This proposed graduated rate structure will cause Sanlando to earn water revenues in excess of those necessary to provide it with the fair rate of return permitted by the PSC. Sanlando's goal is to escrow the additional revenues earned from the higher rates and to use the escrowed funds to construct the infrastructure necessary to deliver treated effluent to three (3) golf courses in its service area for irrigation purposes.

Currently, all three (3) golf courses are irrigating with on-site wells with combined estimated average daily uses of approximately 1,000,000 gallons per day. When Sanlando's proposed reuse project is completed, it will result in the elimination of this water resource withdrawal from Florida's diminishing potable water supply. Moreover, it will encourage reduced water consumption by Sanlando's customers because of the higher rates for increased use.

Significantly, the Florida Department of Environmental Regulation and the St. Johns Water Management District are in favor

of Sanlando's reuse project because it encourages, and promotes, water conservation.

II. ISSUE

The legal issue is whether the PSC has the authority to allow Sanlando to change its water rate structure to a graduated rate structure which will provide excess revenues to be set aside and used for the construction of Sanlando's proposed water conservation and reuse project.

III. DISCUSSION

The encouragement and promotion of water conservation, and the reuse of reclaimed water, are "state objectives" expressly established by the Florida Legislature in Fla. Stat. §403.064(1) (1991). This statement of state objectives clearly makes water conservation and reuse projects in the "public interest." To empower the PSC with respect to these state objectives, Fla. Stat. §403.064(6) provides as follows:

> "Pursuant to Chapter 367, the Public Service Commission shall allow entities which implement reuse projects to recover the full cost of such facilities through their rate structure."

Chapter 367 of the Florida Statutes expressly allows the PSC, when fixing rates, to consider the future investment by utilities in the construction of facilities which are in the public interest. Specifically, Fla. Stat. §367.081(2)(a) (1991) provides, in part, as follows:

> "The Commission shall, either upon request or upon its

own motion, fix rates which are just, reasonable, compensatory, and not unfairly discriminatory. In every such proceeding, the Commission shall consider the value and quality of the service and the cost of providing the service.... The Commission shall also consider the investment of the utility in land acquired or facilities constructed or to be constructed in the public interest within a reasonable time in the future, not to exceed, unless extended by the Commission, twenty-four (24) months from the end of the historical test period used to set final rates." (Emphasis supplied.)

It is clear from §403.064(1)(6) and §367.081(2)(a) that the PSC has the statutory authority to allow Sanlando to change its rate structure to provide revenues to fund the infrastructure necessary for the proposed water conservation and reuse project.

With regard to the type of rate structure proposed by Sanlando, the Florida Supreme Court has held that criteria other than cost of service, including conservation, may be used by the PSC in setting fair and reasonable rates. Occidental Chemical Co. v. Mayo, 351 So.2d 336,340 (Fla. 1977).

Occidental Chemical Co. ("Occidental") purchased electric power from Florida Power Corporation ("Florida Power"). Id. at 338. When Florida Power sought a general rate increase from the PSC, Occidental intervened in the rate proceeding. Occidental attempted to convince the PSC that it should exclusively use a "cost of service" method for allocating any proposed rate increase.

Id. at 339. The PSC, joined by Florida Power, argued that cost of service need not be the sole or dominant factor in structuring rates. Id. at 340. The PSC stated:

> "That in designing rates many factors must be considered, including but not limited to such factors as history of the tariff, rate continuity, public acceptance, value of service, cost of service, conservation, competition, and consumption and loan characteristics, and that no single factor is controlling and susceptible of precise quantification but rather each must be viewed collectively in designing said rates." Id. at 340. (Emphasis supplied.)

The Florida Supreme Court agreed with the PSC and held that other criteria, including conservation, may be used by the PSC in setting fair and reasonable rates. Id. at 340. The Court emphasized that the weight given to each of the aforementioned criteria would be determined by the PSC. Id. at 340, where the Court said:

> "It is immaterial whether we would agree or disagree with Occidental as to the weight to be given a particular "cost of service" formula. The Commission sets rates; not this Court."

The PSC clearly has the authority to allow Sanlando to adopt the type of rate structure proposed to enable Sanlando to pay for the full cost of their proposed reuse project.

IV. CONCLUSION

The PSC has the authority to allow Sanlando to change its water rate structure to a graduated rate structure which will provide excess revenues to be set aside and used for the construction of Sanlando's proposed water conservation and reuse project.

PROPOSED WATER REUSE PROGRAM

FIRST AMENDMENT DATED 1/31/93

SANLANDO UTILITIES CORPORATION

On July 10, 1992, The Florida Department of Environmental Regulation issued Operating Permit Number DO59-200447 to Sanlando Utilities Corporation authorizing Sanlando to continue operating its Wekiva wastewater treatment plant. Included in the specific conditions of the operating permit, specifically paragraphs 3 and 4, are conditions requiring Sanlando to enter into preliminary discussions with Florida Public Service Commission Staff and Commissioners, (to the extent permitted by law), to determine if the Public Service Commission would allow implementation of reuse water conservation rates which will provide capital funding for the construction and installation of the necessary improvements to further treat and deliver reclaimed wastewater to three golf courses located within Sanlando's service area. Paragraph 4 requires that on-site plant modifications and improvements be completed by December 31, 1995, and that the distribution system be completed by December 31, 1996. All three golf courses are currently irrigating with on-site wells with combined estimated average daily usage of approximately 1 MGD. As a result, Sanlando's proposed reuse program, in addition to encouraging reduced water consumption by it's customers, would result in an immediate and significant reduction in water resource withdrawl from Florida's diminishing potable water supply.

At Sanlando's request, Conklin, Porter and Holmes Engineers, Inc. has updated and revised previous studies related to the reuse of

treated effluent produced by Sanlando's Wekiva wastewater treatment plant. A review of their latest report indicates that a system designed to maintain pressure for local system reuse on demand as well as for transmission to the respective golf courses would be the most advantageous and the most economical. This system would be designed with both on-site storage and pumping with the ability to deliver slightly over 1 MGD to the three golf courses on an annual average basis, and another 225,000 gallons to commercial users in the vicinity of the main transmission route to the respective golf courses. Initially, the total captial cost of the three golf course system is estimated by CPH at approximately $1,000,000. As this estimate was prepared during 1992 and will be expended during 1995, 1996, and 1997, the original estimate of $1,000,000 has been escalated by a factor of 5% annually, or for a total of approximately $1,200,000. When considering the other cost associated with the collection of these additional revenues, primarily regualtory assessment fees and income taxes, the total cost of the project approximates $2,050,000.

It is contemplated that funding for this capital program can and should be achieved by implementing a rate structure which requires increases in rates as consumption increases while minimizing the effect on water consumption that can be attributed to household usage. A preliminary review of the consumption data for Sanlando Utilties Corporation for the years ended December 31, 1991 and December 31, 1992 indicates that approximately 80% of Sanlando's total consumption was used by residential customers, approximately 50% of which falls in the

over 15,000 gallon per month range. This translates to approximately one billion gallons per year for irrigation and other outside uses. This disparity suggests that Sanlando's current gallonage charge of 35.5 cents per thousand gallons simply does not encourage water conservation. As a result, implementation of a conservation rate structure provides a method of increasing revenues which can be reserved to fund a water reclamation program without causing the Utility to take unnecessary risks and potentially deteriorate its capital structure. In addition, the impact on the average customer would be minimal.

In developing a rate structure that will not only encourage water conservation, but also provide funds with which to complete the water reuse capital program, the collection of water reuse rates is estimated to occur for the years ended December 31, 1994 through December 31, 1997. This will enable Sanlando to substantially comply with the requirements of its operating permit, and enable earlier adoption of its reuse program. Based on recent historical trends, realizing that Sanlando's service area is almost entirely built out, an annual growth rate of 1% per year was chosen as reasonable for purposes of projecting customers and the resultant number of bills for the years ended December 31, 1993 through December 31, 1997. Consumption patterns on the other hand have traditionally been projected based on historical averages as was the case during the last two rate proceedings. In that regard, the average historical consumption was determined by customer class and in blocks of 0 to 10,000 gallons, 10,000 to 20,000 gallons,

20,000 to 30,000 gallons, and over 30,000 gallons. These averages which are presumed to contemplate weather normalization were then applied to the number of bills as determined above resulting in normalized consumption. The results of these calculations are as shown on Exhibit I, attached hereto. A review of Exhibit I indicates that Sanlando's normalized consumption is expected to range from approximately 3.06 billion gallons in 1993 to approximately 3.18 billion gallons in 1997.

In connection with the adoption of inclining block rates, there is an expectation of a decrease in consumption as the price for water increases. For illustration purposes, estimated reduction in residential consumption caused by an increase in the gallonage charge above the current gallonage charge of 35.5 cents per thousand gallons is as indicated in the following chart:

	CHARGE PER 1000 GALLONS	REDUCED CONSUMPTION
10,000 to 20,000 gallons per month	$ .50	5%
20,000 to 30,000 gallons per month	$ .65	10%
over 30,000 gallons per month	$ .85	20%

These reductions are assumned only for the purpose of illustration. Subsequent to implementation of inclining block rates, real reduction in consumption will be monitored to determine the real impact on consumption. It should be noted that actual variations in consumption

patterns will merely have the effect of accelerating or lengthening the time requirement for collection of the funds necessary with which to complete the reuse project. Assuming the proposed rates are implemented on January 1, 1994, consumption might be impacted as shown on Exhibit II, attached hereto. A review of Exhibit II indicates that consumption might be expected to range from 2.80 billion gallons to 2.87 billion gallons. This represents an annual reduction in potable water withdrawl of approximately 300 million gallons. The total annual reduction in potable water withdrawl when considering the golf course usage could be in excess of a half billion gallons per year.

The annual effect on revenues was determined by applying Sanlando's existing rates to the projected data from Exhibit I, Sanlando's proposed rates to the projected data from Exhibit II, and comparing the two. The difference between the two represents the gross increase in revenues available for the water reuse capital expansion program and is more fully illustrated in Exhibit III, attached hereto. Given the assumptions used in this analysis, the gross and net increase in water revenues could be expected to flow as follows:

YEAR	GROSS REVENUE INCREASE	REGULATORY ASSESSMENT FEE	INCOME TAXES	NET REVENUE INCREASE
1994	534,806	24,066	197,223	313,517
1995	539,613	24,283	202,070	313,260
1996	544,464	24,501	200,425	319,538
1997	549,341	24,720	200,645	323,976
	2,168,224	97,570	800,363	1,270,291

It is contemplated that the excess revenues received would be deposited to an escrow fund and held soley for capital expenditures related to the water reuse program. This escrow fund would also provide the vehicle for tracking fund earnings, and payment of regulatory assessment fees and income taxes related to those excess revenues. Exhibit IV provides a four year summary of the escrow fund which contemplates fund earnings at 5% per year, payment of the regulatory assessment fee at 4.5% per year, and payment of income taxes at the current maximum rate of 37.63% per year. The block rates as shown on Exhibit III given the assumptions used in this analysis would generate funds sufficient with which to fully implement the first phase of the water reuse capital expansion program by December 31, 1997. Upon full implementation of Phase I of the water reuse program, a determination would be made regarding the disposition of the excess funds produced by the water conservation rates. Alternatives might

include a reduction in rates to a level consistent with the then current rate setting regulation, or continued collection based on water conservation rates for further expansion of the water reuse program.

For information purposes, Exhibit V represents a calculation of comparable monthly bills at differing levels of consumption demonstrating the monthly effect on various customers. Exhibit VI depicts a comparison of Sanlando's typical monthly bill at 15,000 gallons of consumption calculated using the proposed water conservation rates to various other utilities within the area. In addition, a copy of the FDER operating permit and a complete copy of the most recent analysis prepared by Conklin, Porter and Holmes Engineers, Inc. are enclosed.

Exhibit VII represents the proposed method of calculating and reporting the portion of the revenues collected that are being transferred to the escrow fund. This schedule contemplates a calculation of revenues as if the existing rates remained in effect whereas the base charge is determined by multiplying the actual number of bills rendered times the applicable base facility charge. Consumption is determined by multiplying the number of bills rendered by the applicable historical four average of consumption. The resultant consumption is multiplied by the applicable gallonage charge and then added to the base facility charge calculation above resulting in total water revenues as if existing rates remained in effect. These amounts are compared to actual revenues based on the reuse rates, the difference representing that portion of the revenues that will be

transferred to the escrow fund. This calculation would be required monthly in order to determine the proper transfer to the escrow fund.

SANLANDO UTILITIES CORPORATION
ASSUMING EXISTING RATES
EXHIBIT I
CUSTOMER GROWTH RATE:
1.00% ANNUALLY

		HISTORICAL DATA					PROJECTED	PROJECTED	PROJECTED	PROJECTED	PROJECTED
		ACTUAL NUMBER OF BILLS/ CONSUMPTION 12/89	ACTUAL NUMBER OF BILLS/ CONSUMPTION 12/90	ACTUAL NUMBER OF BILLS/ CONSUMPTION 12/91	ACTUAL NUMBER OF BILLS/ CONSUMPTION 12/92	FOUR YEAR AVERAGE CONSUMPTION PER BILL	NUMBER OF BILLS/ CONSUMPTION 12/93	NUMBER OF BILLS/ CONSUMPTION 12/94	NUMBER OF BILLS/ CONSUMPTION 12/95	NUMBER OF BILLS/ CONSUMPTION 12/96	NUMBER OF BILLS/ CONSUMPTION 12/97
WATER:											
RESIDENTIAL	3/4"	70,466	71,124	70,976	71,083		71,794	72,512	73,237	73,969	74,709
	1"	32,816	33,767	34,110	34,512		34,857	35,206	35,558	35,914	36,273
	1 1/2"	240	239	246	247		249	251	251	254	254
	TOTALS	103,522	105,130	105,332	105,842		106,900	107,969	109,046	110,137	111,236
GALLONS BILLED (000)	0-10000	887,528	902,149	881,013	885,371	8.471	905,550	914,605	923,729	932,971	942,280
	10000-20000	552,231	563,822	490,318	497,677	5.014	535,997	541,357	546,757	552,227	557,737
	20000-30000	351,127	365,566	288,548	304,391	3.121	333,635	336,971	340,333	343,738	347,168
	OVER 30000	751,224	736,462	513,474	550,640	6.085	650,487	656,991	663,545	670,184	676,871
	TOTALS	2,542,110	2,567,999	2,173,353	2,238,079	22.691	2,425,669	2,449,924	2,474,364	2,499,120	2,524,056
GENERAL SERVICE	3/4"	1,233	1,197	1,152	1,272		1,285	1,298	1,311	1,324	1,337
	1"	1,911	1,968	1,997	2,125		2,146	2,167	2,189	2,211	2,233
	1 1/2"	536	554	599	622		628	634	640	646	652
	2"	568	590	634	648		654	661	668	675	682
	3"	45	49	49	51		52	53	54	55	56
	4"	34	36	36	36		36	36	36	36	36
	6"	24	25	24	24		24	24	24	24	24
	TOTALS	4,351	4,419	4,491	4,778		4,825	4,873	4,922	4,971	5,020
GALLONS BILLED (000)	0-10000	29,718	30,270	30,549	33,211	6.858	33,090	33,419	33,755	34,091	34,427
	10000-20000	22,673	22,971	23,204	24,989	5.202	25,100	25,349	25,604	25,859	26,114
	20000-30000	18,752	19,110	19,167	20,421	4.294	20,719	20,925	21,135	21,345	21,556
	OVER 30000	207,536	211,333	216,092	226,614	47.767	230,476	232,769	235,109	237,450	239,790
	TOTALS	278,679	283,684	289,012	305,235	64.121	309,385	312,462	315,603	318,745	321,887
MULTI FAMILY	3/4"	228	230	228	228		230	232	234	236	238
	1"	84	83	84	84		85	86	87	88	89
	1 1/2"	812	812	814	817		825	833	841	849	857
	2"	730	728	738	816		824	832	840	848	856
	3"	168	180	180	180		182	184	186	188	190
	4"	24	24	24	24		24	24	24	24	24
	6"	12	12	12	12		12	12	12	12	12
	TOTALS	2,058	2,069	2,080	2,161		2,182	2,203	2,224	2,245	2,266
GALLONS BILLED (000)	0-10000	19,492	19,983	19,924	20,794	9.583	20,910	21,111	21,313	21,514	21,715
	10000-20000	16,851	17,709	17,523	18,089	8.386	18,298	18,474	18,650	18,827	19,003
	20000-30000	13,659	15,071	14,941	15,233	7.038	15,357	15,505	15,653	15,800	15,948
	OVER 30000	109,631	111,741	104,875	114,976	52.726	115,048	116,155	117,263	118,370	119,477
	TOTALS	159,633	164,504	157,263	169,092	77.733	169,613	171,245	172,879	174,511	176,143
BULK SALES	6"	24	24	24	24		24	24	24	24	24
	8"	0	0	3	12		12	12	12	12	12
	TOTALS	24	24	27	36		36	36	36	36	36
GALLONS BILLED (000)	0-10000	240	240	260	282	9.366	337	337	337	337	337
	10000-20000	240	240	247	250	9.023	325	325	325	325	325
	20000-30000	240	240	240	240	8.889	320	320	320	320	320
	OVER 30000	120,205	133,130	113,200	104,945	4,415.839	158,970	158,970	158,970	158,970	158,970
	TOTALS	120,925	133,850	113,947	105,717	4,443.117	159,952	159,952	159,952	159,952	159,952
TOTAL CONSUMPTION		3,101,347	3,150,037	2,733,575	2,818,123		3,064,619	3,093,583	3,122,798	3,152,328	3,182,038
TOTAL BILLS		109,955	111,642	111,930	112,817		113,943	115,081	116,228	117,389	118,558

CALCULATION OF PROJECTED BILLS & CONSUMPTION USING WATER CONSERVATION RATES
SANLANDO UTILITIES CORPORATION
EXHIBIT II

CUSTOMER GROWTH RATE:		1.00%	PROJECTED NUMBER OF BILLS/ CONSUMPTION 12/93	PROJECTED NUMBER OF BILLS/ CONSUMPTION 12/94	PROJECTED NUMBER OF BILLS/ CONSUMPTION 12/95	PROJECTED NUMBER OF BILLS/ CONSUMPTION 12/96	PROJECTED NUMBER OF BILLS/ CONSUMPTION 12/97
EST. CONSUMPTION REDUCTION:							
10,000 TO 20,000 GALLONS-		5.00%					
20,000 TO 30,000 GALLONS-		10.00%					
OVER 30,000 GALLONS-		20.00%					
WATER:							
RESIDENTIAL		3/4"	71,794	72,512	73,237	73,969	74,709
		1"	34,857	35,206	35,558	35,914	36,273
		1 1/2"	249	251	251	254	254
		TOTALS	106,900	107,969	109,046	110,137	111,236
BLOCK CONSUMPTION (000)		0-10000	905,550	914,605	923,729	932,971	942,280
		10000-20000	535,997	514,289	519,419	524,616	529,850
		20000-30000	333,635	303,274	306,300	309,364	312,451
		OVER 30000	650,487	525,593	530,836	536,147	541,497
		TOTALS	2,425,669	2,257,761	2,280,284	2,303,098	2,326,078
GENERAL SERVICE		3/4"	1,285	1,298	1,311	1,324	1,337
		1"	2,146	2,167	2,189	2,211	2,233
		1 1/2"	628	634	640	646	652
		2"	654	661	668	675	682
		3"	52	53	54	55	56
		4"	36	36	36	36	36
		6"	24	24	24	24	24
		TOTALS	4,825	4,873	4,922	4,971	5,020
BLOCK CONSUMPTION (000)		0-10000	33,090	33,419	33,755	34,091	34,427
		10000-20000	25,100	24,082	24,324	24,566	24,808
		20000-30000	20,719	18,833	19,022	19,211	19,400
		OVER 30000	230,476	186,215	188,087	189,960	191,832
		TOTALS	309,385	262,549	265,188	267,828	270,467
MULTI FAMILY		3/4"	230	232	234	236	238
		1"	85	86	87	88	89
		1 1/2"	825	833	841	849	857
		2"	824	832	840	848	856
		3"	182	184	186	188	190
		4"	24	24	24	24	24
		6"	12	12	12	12	12
		TOTALS	2,182	2,203	2,224	2,245	2,266
BLOCK CONSUMPTION (000)		0-10000	20,910	21,111	21,313	21,514	21,715
		10000-20000	18,298	17,550	17,718	17,886	18,053
		20000-30000	15,357	13,955	14,088	14,220	14,353
		OVER 30000	115,048	92,924	93,810	94,696	95,582
		TOTALS	169,613	145,540	146,929	148,316	149,703
BULK SALES		6"	24	24	24	24	24
		8"	12	12	12	12	12
		TOTALS	36	36	36	36	36
BLOCK CONSUMPTION (000)		0-10000	337	337	337	337	337
		10000-20000	325	309	309	309	309
		20000-30000	320	288	288	288	288
		OVER 30000	158,970	127,176	127,176	127,176	127,176
		TOTALS	159,952	128,110	128,110	128,110	128,110
TOTAL CONSUMPTION			3,064,619	2,793,960	2,820,511	2,847,352	2,874,358
TOTAL BILLS			113,943	115,081	116,228	117,389	118,558

COMPARISON OF WATER REVENUES
SANLANDO UTILITIES CORPORATION
PROJECTED FOR THE YEAR ENDED 12/31/94
WATER CONSERVATION RATE STRUCTURE
EXHIBIT III

PAGE 1

		SANLANDO CURRENT RATES	SANLANDO PROPOSED RATES	PROJECTED NUMBER OF BILLS AND CONSUMPTION AT CURRENT RATES 1994	PROJECTED NUMBER OF BILLS AND CONSUMPTION AT PROPOSED RATES 1994	PROJECTED REVENUE AT CURRENT RATES 1994	PROJECTED REVENUE AT PROPOSED RATES 1994	GROSS AMOUNT SUBJECT TO ESCROW FUND
WATER:								
RESIDENTIAL	3/4"	4.03	4.03	72,512	72,512	292,223	292,223	0
	1"	10.09	10.09	35,206	35,206	355,229	355,229	0
	1 1/2"	20.18	20.18	251	251	5,065	5,065	0
	TOTALS			107,969	107,969	652,517	652,517	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	914,605	914,605	324,685	324,685	0
	10000-20000	0.355	0.50	541,357	514,289	192,182	257,145	64,963
	20000-30000	0.355	0.65	336,971	303,274	119,625	197,128	77,503
	OVER 30000	0.355	0.85	656,991	525,593	233,232	446,754	213,522
	TOTALS			2,449,924	2,257,761	869,724	1,225,712	355,988
GENERAL SERVICE	3/4"	4.03	4.03	1,298	1,298	5,231	5,231	0
	1"	10.09	10.09	2,167	2,167	21,865	21,865	0
	1 1/2"	20.18	20.18	634	634	12,794	12,794	0
	2"	32.29	32.29	661	661	21,344	21,344	0
	3"	64.57	64.57	53	53	3,422	3,422	0
	4"	100.91	100.91	36	36	3,633	3,633	0
	6"	201.81	201.81	24	24	4,843	4,843	0
	TOTALS			4,873	4,873	73,132	73,132	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	33,419	33,419	11,864	11,864	0
	10000-20000	0.355	0.50	25,349	24,082	8,999	12,041	3,042
	20000-30000	0.355	0.65	20,925	18,833	7,428	12,241	4,813
	OVER 30000	0.355	0.85	232,769	186,215	82,633	158,283	75,650
	TOTALS			312,462	262,549	110,924	194,429	83,505
MULTI FAMILY	3/4"	4.03	4.03	232	232	935	935	0
	1"	10.09	10.09	86	86	868	868	0
	1 1/2"	20.18	20.18	833	833	16,810	16,810	0
	2"	32.29	32.29	832	832	26,865	26,865	0
	3"	64.57	64.57	184	184	11,881	11,881	0
	4"	100.91	100.91	24	24	2,422	2,422	0
	6"	201.81	201.81	12	12	2,422	2,422	0
	TOTALS			2,203	2,203	62,203	62,203	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	21,111	21,111	7,494	7,494	0
	10000-20000	0.355	0.50	18,474	17,550	6,558	8,775	2,217
	20000-30000	0.355	0.65	15,505	13,955	5,504	9,071	3,567
	OVER 30000	0.355	0.85	116,155	92,924	41,235	78,985	37,750
	TOTALS			171,245	145,540	60,791	104,325	43,534
BULK SALES	6"	201.81	201.81	24	24	4,843	4,843	0
	8"	362.83	362.83	12	12	4,354	4,354	0
	TOTALS			36	36	9,197	9,197	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	337	337	120	120	0
	10000-20000	0.355	0.50	325	309	115	155	40
	20000-30000	0.355	0.65	320	288	114	187	73
	OVER 30000	0.355	0.85	158,970	127,176	56,434	108,100	51,666
	TOTALS			159,952	128,110	56,783	108,562	51,779
	GRAND TOTALS					1,895,271	2,430,077	534,806

SANLANDO UTILITIES CORPORATION
PROJECTED FOR THE YEAR ENDED 12/31/95
WATER CONSERVATION RATE STRUCTURE
EXHIBIT III

PAGE 2

		SANLANDO CURRENT RATES	SANLANDO PROPOSED RATES	PROJECTED NUMBER OF BILLS AND CONSUMPTION AT CURRENT RATES 1995	PROJECTED NUMBER OF BILLS AND CONSUMPTION AT PROPOSED RATES 1995	PROJECTED REVENUE AT CURRENT RATES 1995	PROJECTED REVENUE AT PROPOSED RATES 1995	GROSS AMOUNT SUBJECT TO ESCROW FUND
WATER:								
RESIDENTIAL	3/4"	4.03	4.03	73,237	73,237	295,145	295,145	0
	1"	10.09	10.09	35,558	35,558	358,780	358,780	0
	1 1/2"	20.18	20.18	251	251	5,065	5,065	0
	TOTALS			109,046	109,046	658,990	658,990	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	923,729	923,729	327,924	327,924	0
	10000-20000	0.355	0.50	546,757	519,419	194,099	259,710	65,611
	20000-30000	0.355	0.65	340,333	306,300	120,818	199,095	78,277
	OVER 30000	0.355	0.85	663,545	530,836	235,558	451,211	215,653
	TOTALS			2,474,364	2,280,284	878,399	1,237,940	359,541
GENERAL SERVICE	3/4"	4.03	4.03	1,311	1,311	5,283	5,283	0
	1"	10.09	10.09	2,189	2,189	22,087	22,087	0
	1 1/2"	20.18	20.18	640	640	12,915	12,915	0
	2"	32.29	32.29	668	668	21,570	21,570	0
	3"	64.57	64.57	54	54	3,487	3,487	0
	4"	100.91	100.91	36	36	3,633	3,633	0
	6"	201.81	201.81	24	24	4,843	4,843	0
	TOTALS			4,922	4,922	73,818	73,818	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	33,755	33,755	11,983	11,983	0
	10000-20000	0.355	0.50	25,604	24,324	9,089	12,162	3,073
	20000-30000	0.355	0.65	21,135	19,022	7,503	12,364	4,861
	OVER 30000	0.355	0.85	235,109	188,087	83,464	159,874	76,410
	TOTALS			315,603	265,188	112,039	196,383	84,344
MULTI FAMILY	3/4"	4.03	4.03	234	234	943	943	0
	1"	10.09	10.09	87	87	878	878	0
	1 1/2"	20.18	20.18	841	841	16,971	16,971	0
	2"	32.29	32.29	840	840	27,124	27,124	0
	3"	64.57	64.57	186	186	12,010	12,010	0
	4"	100.91	100.91	24	24	2,422	2,422	0
	6"	201.81	201.81	12	12	2,422	2,422	0
	TOTALS			2,224	2,224	62,770	62,770	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	21,313	21,313	7,566	7,566	0
	10000-20000	0.355	0.50	18,650	17,718	6,621	8,859	2,238
	20000-30000	0.355	0.65	15,653	14,088	5,557	9,157	3,600
	OVER 30000	0.355	0.85	117,263	93,810	41,628	79,739	38,111
	TOTALS			172,879	146,929	61,372	105,321	43,949
BULK SALES	6"	201.81	201.81	24	24	4,843	4,843	0
	8"	362.83	362.83	12	12	4,354	4,354	0
	TOTALS			36	36	9,197	9,197	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	337	337	120	120	0
	10000-20000	0.355	0.50	325	309	115	155	40
	20000-30000	0.355	0.65	320	288	114	187	73
	OVER 30000	0.355	0.85	158,970	127,176	56,434	108,100	51,666
	TOTALS			159,952	128,110	56,783	108,562	51,779
	GRAND TOTALS					1,913,368	2,452,981	539,613

SANLANDO UTILITIES CORPORATION
PROJECTED FOR THE YEAR ENDED 12/31/96
WATER CONSERVATION RATE STRUCTURE
EXHIBIT III

PAGE 3

		SANLANDO CURRENT RATES	SANLANDO PROPOSED RATES	PROJECTED NUMBER OF BILLS AND CONSUMPTION AT CURRENT RATES 1996	PROJECTED NUMBER OF BILLS AND CONSUMPTION AT PROPOSED RATES 1996	PROJECTED REVENUE AT CURRENT RATES 1996	PROJECTED REVENUE AT PROPOSED RATES 1996	GROSS AMOUNT SUBJECT TO ESCROW FUND
WATER:								
RESIDENTIAL	3/4"	4.03	4.03	73,969	73,969	298,095	298,095	0
	1"	10.09	10.09	35,914	35,914	362,372	362,372	0
	1 1/2"	20.18	20.18	254	254	5,126	5,126	0
	TOTALS			110,137	110,137	665,593	665,593	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	932,971	932,971	331,205	331,205	0
	10000-20000	0.355	0.50	552,227	524,616	196,041	262,308	66,267
	20000-30000	0.355	0.65	343,738	309,364	122,027	201,087	79,060
	OVER 30000	0.355	0.85	670,184	536,147	237,915	455,725	217,810
	TOTALS			2,499,120	2,303,098	887,188	1,250,325	363,137
GENERAL SERVICE	3/4"	4.03	4.03	1,324	1,324	5,336	5,336	0
	1"	10.09	10.09	2,211	2,211	22,309	22,309	0
	1 1/2"	20.18	20.18	646	646	13,036	13,036	0
	2"	32.29	32.29	675	675	21,796	21,796	0
	3"	64.57	64.57	55	55	3,551	3,551	0
	4"	100.91	100.91	36	36	3,633	3,633	0
	6"	201.81	201.81	24	24	4,843	4,843	0
	TOTALS			4,971	4,971	74,504	74,504	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	34,091	34,091	12,102	12,102	0
	10000-20000	0.355	0.50	25,859	24,566	9,180	12,283	3,103
	20000-30000	0.355	0.65	21,345	19,211	7,577	12,487	4,910
	OVER 30000	0.355	0.85	237,450	189,960	84,295	161,466	77,171
	TOTALS			318,745	267,828	113,154	198,338	85,184
MULTI FAMILY	3/4"	4.03	4.03	236	236	951	951	0
	1"	10.09	10.09	88	88	888	888	0
	1 1/2"	20.18	20.18	849	849	17,133	17,133	0
	2"	32.29	32.29	848	848	27,382	27,382	0
	3"	64.57	64.57	188	188	12,139	12,139	0
	4"	100.91	100.91	24	24	2,422	2,422	0
	6"	201.81	201.81	12	12	2,422	2,422	0
	TOTALS			2,245	2,245	63,337	63,337	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	21,514	21,514	7,637	7,637	0
	10000-20000	0.355	0.50	18,827	17,886	6,684	8,943	2,259
	20000-30000	0.355	0.65	15,800	14,220	5,609	9,243	3,634
	OVER 30000	0.355	0.85	118,370	94,696	42,021	80,492	38,471
	TOTALS			174,511	148,316	61,951	106,315	44,364
BULK SALES	6"	201.81	201.81	24	24	4,843	4,843	0
	8"	362.83	362.83	12	12	4,354	4,354	0
	TOTALS			36	36	9,197	9,197	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	337	337	120	120	0
	10000-20000	0.355	0.50	325	309	115	155	40
	20000-30000	0.355	0.65	320	288	114	187	73
	OVER 30000	0.355	0.85	158,970	127,176	56,434	108,100	51,666
	TOTALS			159,952	128,110	56,783	108,562	51,779
	GRAND TOTALS					1,931,707	2,476,171	544,464

SANLANDO UTILITIES CORPORATION
PROJECTED FOR THE YEAR ENDED 12/31/97
WATER CONSERVATION RATE STRUCTURE
EXHIBIT III

PAGE 4

		SANLANDO CURRENT RATES	SANLANDO PROPOSED RATES	PROJECTED NUMBER OF BILLS AND CONSUMPTION AT CURRENT RATES 1997	PROJECTED NUMBER OF BILLS AND CONSUMPTION AT PROPOSED RATES 1997	PROJECTED REVENUE AT CURRENT RATES 1997	PROJECTED REVENUE AT PROPOSED RATES 1997	GROSS AMOUNT SUBJECT TO ESCROW FUND
WATER:								
RESIDENTIAL	3/4"	4.03	4.03	74,709	74,709	301,077	301,077	0
	1"	10.09	10.09	36,273	36,273	365,995	365,995	0
	1 1/2"	20.18	20.18	254	254	5,126	5,126	0
	TOTALS			111,236	111,236	672,198	672,198	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	942,280	942,280	334,509	334,509	0
	10000-20000	0.355	0.50	557,737	529,850	197,997	264,925	66,928
	20000-30000	0.355	0.65	347,168	312,451	123,245	203,093	79,848
	OVER 30000	0.355	0.85	676,871	541,497	240,289	460,272	219,983
	TOTALS			2,524,056	2,326,078	896,040	1,262,799	366,759
GENERAL SERVICE	3/4"	4.03	4.03	1,337	1,337	5,388	5,388	0
	1"	10.09	10.09	2,233	2,233	22,531	22,531	0
	1 1/2"	20.18	20.18	652	652	13,157	13,157	0
	2"	32.29	32.29	682	682	22,022	22,022	0
	3"	64.57	64.57	56	56	3,616	3,616	0
	4"	100.91	100.91	36	36	3,633	3,633	0
	6"	201.81	201.81	24	24	4,843	4,843	0
	TOTALS			5,020	5,020	75,190	75,190	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	34,427	34,427	12,222	12,222	0
	10000-20000	0.355	0.50	26,114	24,808	9,270	12,404	3,134
	20000-30000	0.355	0.65	21,556	19,400	7,652	12,610	4,958
	OVER 30000	0.355	0.85	239,790	191,832	85,125	163,057	77,932
	TOTALS			321,887	270,467	114,269	200,293	86,024
MULTI FAMILY	3/4"	4.03	4.03	238	238	959	959	0
	1"	10.09	10.09	89	89	898	898	0
	1 1/2"	20.18	20.18	857	857	17,294	17,294	0
	2"	32.29	32.29	856	856	27,640	27,640	0
	3"	64.57	64.57	190	190	12,268	12,268	0
	4"	100.91	100.91	24	24	2,422	2,422	0
	6"	201.81	201.81	12	12	2,422	2,422	0
	TOTALS			2,266	2,266	63,903	63,903	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	21,715	21,715	7,709	7,709	0
	10000-20000	0.355	0.50	19,003	18,053	6,746	9,027	2,281
	20000-30000	0.355	0.65	15,948	14,353	5,662	9,329	3,667
	OVER 30000	0.355	0.85	119,477	95,582	42,414	81,245	38,831
	TOTALS			176,143	149,703	62,531	107,310	44,779
BULK SALES	6"	201.81	201.81	24	24	4,843	4,843	0
	8"	362.83	362.83	12	12	4,354	4,354	0
	TOTALS			36	36	9,197	9,197	0
USAGE CHARGE PER 1000	0-10000	0.355	0.355	337	337	120	120	0
	10000-20000	0.355	0.50	325	309	115	155	40
	20000-30000	0.355	0.65	320	288	114	187	73
	OVER 30000	0.355	0.85	158,970	127,176	56,434	108,100	51,666
	TOTALS			159,952	128,110	56,783	108,562	51,779
	GRAND TOTALS					1,950,111	2,499,452	549,341

ANALYSIS OF ESCROW FUND
SANLANDO UTILITIES CORPORATION
EXHIBIT IV

ESTIMATED EARNINGS RATE: 5.00%
REGULATORY ASSESSMENT FEE: 4.50%
ESTIMATED INCOME TAX RATE: 37.63%

	DEPOSIT	PROGRESS EXPENDITURES	EARNINGS	REGULATORY ASSESSMENT FEE	INCOME TAXES	END OF PERIOD BALANCE
1994	534,806	0	13,370	24,066	197,223	326,887
1995	539,613	400,000	11,663	24,283	198,307	255,573
1996	544,464	400,000	10,001	24,501	199,425	186,112
1997	549,341	400,000	8,386	24,720	200,571	118,548
	2,168,224	1,200,000	43,420	97,570	795,526	

CALCULATION OF COMPARABLE MONTHLY BILLS
SANLANDO UTILITIES CORPORATION
METER SIZE-3/4"
EXHIBIT V

		MONTHLY BILL AT SANLANDO CURRENT RATES	MONTHLY BILL AT SANLANDO PROPOSED RATES	MONTHLY INCREASE
RESIDENTIAL--				
CONSUMPTION-	10,000	7.58	7.58	0.00
CONSUMPTION-	20,000	11.13	12.58	1.45
CONSUMPTION-	30,000	14.68	19.08	4.40
CONSUMPTION-	40,000	18.23	27.58	9.35
CONSUMPTION-	50,000	21.78	36.08	14.30
AVERAGE-	22,691	12.09	14.33	2.24
GENERAL SERVICE--				
CONSUMPTION-	10,000	7.58	7.58	0.00
CONSUMPTION-	20,000	11.13	12.58	1.45
CONSUMPTION-	30,000	14.68	19.08	4.40
CONSUMPTION-	40,000	18.23	27.58	9.35
CONSUMPTION-	50,000	21.78	36.08	14.30
AVERAGE-	64,121	26.79	48.08	21.29
MULTI FAMILY--				
CONSUMPTION-	10,000	7.58	7.58	0.00
CONSUMPTION-	20,000	11.13	12.58	1.45
CONSUMPTION-	30,000	14.68	19.08	4.40
CONSUMPTION-	40,000	18.23	27.58	9.35
CONSUMPTION-	50,000	21.78	36.08	14.30
AVERAGE-	77,733	31.63	59.65	28.02
BULK SALE:6"--				
AVERAGE-	4,443,117	1779.12	3968.01	2188.89

NOTE: AN ANALYSIS OF THE BULK SALE ARRANGEMENTS INDICATED THAT THERE ARE APPROXIMATELY 690 BILLING UNITS CONVERTING TO AN AVERAGE USAGE OF 17,000 GALLONS PER MONTH PER BILLING UNIT.

COMPARISION OF CHARGES FOR MONTHLY UTILITY SERVICES
SANLANDO UTILITIES CORPORATION
USAGE OF 15000 GALLONS
EXHIBIT VI

COMBINED RESIDENTIAL WATER & SEWER FEE	
CITY OF CLERMONT	$ 29.85
DELTONA UTILITIES, INC.	30.73
CITY OF LAKELAND	31.10
SANLANDO UTILITIES CORPORATION (PROPOSED)	**32.38**
CITY OF WINTER GARDEN	32.72
CITY OF APOPKA	37.00
CITY OF MAITLAND	43.65
CITY OF WINTER PARK	44.30
POINCIANA, INC.	44.55
CITY OF ORLANDO	46.79
CITY OF CASSELBERRY	49.55
CITY OF WINTER SPRINGS	49.78
CITY OF OCOEE	51.01
CITY OF LONGWOOD	51.78
SEMINOLE COUNTY	53.00
CITY OF ALTAMONTE SPRINGS	53.31
CITY OF COCOA	54.79
SOUTHERN STATES (UNIV. SHORES)	55.88
CITY OF LAKE MARY	58.56
DEBARY ASSOCIATES, INC.	60.03
CITY OF KISSIMMEE	62.56
CITY OF ST. CLOUD	65.25
CITY OF MELBOURNE	69.62
BREVARD COUNTY	69.95
REEDY CREEK IMPROVEMENT DISTRICT	75.04
ORANGE COUNTY	77.90
SOUTHERN STATES (SEMINOLE COUNTY)	82.73
ENTERPRISE UTILITIES CORPORATION	85.14
SOUTHERN STATES (SUGAR MILL)	89.80
CITY OF PALM BAY	108.10
COMBINED AVERAGE UTILITY	$ 56.56

CALCULATION OF ESCROW FUND DEPOSIT
SANLANDO UTILITIES CORPORATION
FOR THE MONTH ENDED

EXHIBIT VII

		SANLANDO APPROVED RATES	SANLANDO CONSERVATION RATES	PROJECTED CONSUMPTION PER BILL	ACTUAL NUMBER OF BILLS AND PROJECTED CONSUMPTION FOR THE MONTH ENDED	PROJECTED REVENUE AT APPROVED RATES FOR THE MONTH ENDED	ACTUAL REVENUE AT CONSERVATION RATES FOR THE MONTH ENDED	GROSS AMOUNT TO BE TRANSFERRED TO ESCROW FUND
WATER:								
RESIDENTIAL	3/4"	4.03	4.03					
	1"	10.09	10.09					
	1 1/2"	20.18	20.18					
	TOTALS							
USAGE CHARGE PER 1000	0-10000	0.355	0.355	8.471				
	10000-20000	0.355	0.50	5.014				
	20000-30000	0.355	0.65	3.121				
	OVER 30000	0.355	0.85	6.085				
	TOTALS			22.691				
GENERAL SERVICE	3/4"	4.03	4.03					
	1"	10.09	10.09					
	1 1/2"	20.18	20.18					
	2"	32.29	32.29					
	3"	64.57	64.57					
	4"	100.91	100.91					
	6"	201.81	201.81					
	TOTALS							
USAGE CHARGE PER 1000	0-10000	0.355	0.355	6.858				
	10000-20000	0.355	0.50	5.202				
	20000-30000	0.355	0.65	4.294				
	OVER 30000	0.355	0.85	47.767				
	TOTALS			64.121				
MULTI FAMILY	3/4"	4.03	4.03					
	1"	10.09	10.09					
	1 1/2"	20.18	20.18					
	2"	32.29	32.29					
	3"	64.57	64.57					
	4"	100.91	100.91					
	6"	201.81	201.81					
	TOTALS							
USAGE CHARGE PER 1000	0-10000	0.355	0.355	9.583				
	10000-20000	0.355	0.50	8.386				
	20000-30000	0.355	0.65	7.038				
	OVER 30000	0.355	0.85	52.726				
	TOTALS			77.733				
BULK SALES	6"	201.81	201.81					
	8"	362.83	362.83					
	TOTALS							
USAGE CHARGE PER 1000	0-10000	0.355	0.355	9.366				
	10000-20000	0.355	0.50	9.023				
	20000-30000	0.355	0.65	8.889				
	OVER 30000	0.355	0.85	4415.839				
	TOTALS			4443.117				
	GRAND TOTALS							

Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL
P 037 854 039

c: HC
MAC
South
RAM
GHB 8/7/92

RECEIVED
JUL 17 1992
SANLANDO UTILITIES CORP.

Sanlando Utilities Corporation
Post Office Box 3884
Longwood, FL 32750

Attention: Hubert Jacques,
Executive Vice President

Seminole County - DW
Wekiva Hunt Club, W.W.T.P.

Dear Mr. Jacques:

Enclosed is Permit Number DO59-200447 to operate a domestic wastewater treatment facility issued pursuant to Section(s) 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information; (a) the name, address, and telephone number of each petitioner, the applicant's name and address, the Department permit file number and the county in which the project is proposed; (b) a statement of how and when each petitioner received notice of the Department's action or proposed action; (c) a statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) a statement of the material facts disputed by petitioner, if any; (e) a statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) a statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) a statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for D. M. McDonald, P.E.
A. Alexander
District Director
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk _____ Date 7/10/92

CF
AA/lm/dv

Copies furnished to:

Terry M. Zaudtke, P.E.
Richard Drew, NPDES, Tallahassee
Nancy Prine
Charles Lee
Doug Maclaughlin, Esquire

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on 7/14/92 to the listed persons, by Darlyn McLaughlin

Rev. 4/91

Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

Permittee:
Sanlando Utilities Corporation
Post Office Box 3884
Longwood, FL 32750

Attention: Hubert Jacques,
Executive Vice President

I. D. Number: 3059P03243
Permit Number: DO59-200447
Expiration Date: 06/27/97
County: Seminole
Project: Wekiva Hunt Club, W.W.T.P.

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-4, 17-600, and 17-610 F.A.C. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operate: A 2.9 MGD design capacity wastewater treatment facility, consisting of three (3) parallel activated sludge package plants with chemical feed (sodium aluminate) facilities for phosphorus control, disinfection by chlorination, tertiary filtration and dechlorination via a sulfur dioxide system . Domestic residuals (sludge) stabilization/processing is by aerobic digestion and two (2) vacuum assisted drying beds. The disinfected/dechlorinated effluent is discharged to surface water via outfall pipe to Sweetwater Creek at the existing north outfall structure.

Location: 144 Ledbury Drive, Wekiva Hunt Club Subdivision, Longwood, Seminole County, Florida.

Treatment Required: Treatment beyond secondary in accordance with the effluent limitations contained in Specific Condition #7, basic disinfection and dechlorination prior to discharge to Sweetwater Creek.

Operators Required: This is a Class B, Category I treatment facility. In accordance with Chapter 17-602, F.A.C. an operator of minimum certification Class C shall be on-site for sixteen (16) hours per day for seven (7) days per week. The lead/chief operator shall be Class B, or higher.

Other Permits: This permit supersedes and replaces DO59-164029. This permit also supersedes and replaces DO59-200447, originally issured October 23, 1991.

General Conditions are attached to be distributed to the permittee only.

NERAL CONDITIONS:

The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

(a) Have access to and copy any records that must be kept under conditions of the permit;

(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of noncompliance; and

(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

ENERAL CONDITIONS:

In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.309, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

This permit or a copy thereof shall be kept at the work site of the permitted activity.

This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)

( ) Determination of Prevention of Significant Deterioration (PSD)

( ) Certification of compliance with state Water Quality Standards (Section 401, PL 92-500)

( ) Compliance with New Source Performance Standards

The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

(b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

1. the date, exact place, and time of sampling or measurements;
2. the person responsible for performing the sampling or measurements;
3. the dates analyses were performed;
4. the person responsible for performing the analyses;
5. the analytical techniques or methods used;
6. the results of such analyses.

When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Attention: Hubert Jacques
Executive Vice President

SPECIFIC CONDITIONS:

1. The required compliance sampling for the treatment plant effluent (at the meter box) prior to discharge to Sweetwater Creek shall be as follows:

Parameter	Recording or sampling Frequency
Total Suspended Solids (TSS)*	weekly
$CBOD_5$*	weekly
pH	continuous
Chlorine residual	continuous
Flow	continuous
Fecal coliform	weekly
Nitrate Nitrogen as N	weekly
Total Nitrogen as N	weekly
Ammonia Nitrogen as N	weekly
Total Phosphorus as P	weekly
Dissolved Oxygen	daily
Chlorine Residual following dechlorination (at outfall)	daily

* Influent and effluent

The sampling and analysis required above shall be in accordance with Chapter 17-601, F.A.C. and approved standard methods. Properly executed reports shall be submitted monthly to this office, by the 28th day of the following month.

2. Water quality monitoring shall be performed in Sweetwater Creek/Cove Lake for the six (6) sampling stations identified in Section 4-4 of the Wekiva Hunt Club, S.T.P. Phase III Expansion and Improvement Engineering Report dated March 1989 and an additional station in the Wekiva River where Miami Springs Road bridge is located as follows:

Parameter	Frequency
$CBOD_5$	monthly
Chloride	monthly
TOC	monthly
Nitrate Nitrogen as N	monthly
Ammonia Nitrogen as N	monthly
Total Kjeldahl Nitrogen as N	monthly
Total Phosphorus as P	monthly
Ortho Phosphorus as P	monthly
Total Suspended Solids	monthly
Chlorophyll-a	monthly
Alkalinity	monthly
Dissolved Oxygen	monthly
pH	monthly
Temperature	monthly
Sediment Oxygen Demand	annually

Attention: Hubert Jacques
Executive Vice President

SPECIFIC CONDITIONS:

Monthly sampling must be conducted to ensure that two (2) of the twelve (12) samples are taken during low flow and high flow conditions in Sweetwater Creek and Cove Lake. USGS gauging stations in the Wekiva River will be used to predict high and low flow conditions. In addition, during the first two (2) years of this permit - four (4) sampling events (two (2) each year) shall be conducted within twenty four (24) hours of a significant rainfall event following a period of dry weather of a minimum seven (7) day duration.

Whole Effluent Toxicity Testing shall be conducted in accordance with the requirements of NPDES permit FL0036251, dated February 1, 1991, (see Attachment A) and the results submitted to the Central District Office following each testing period.

3. In order to encourage the conservation of water and the reduction of sewage effluent, and in order to provide a fund for the construction of the improvements described in Paragraphs 3(i) and 3(ii) hereof, Sanlando Utilities Corporation, and any successor owner of the sewage treatment plant which is the subject of the Operating Permit, shall use its best efforts to implement an "inverted rate structure" which shall charge customers an increased rate based upon the amount of water consumed. Beginning when permitted by the Florida Public Service Commission, the rates charged shall be not less than the following schedule:

Charge per 1,000 gallons of water:

Up to 10,000 gallons per month:	$.34 per 1,000 gallons.
10,000 to 20,000 gallons per month:	$.50 per 1,000 gallons.
20,000 to 30,000 gallons per month:	$.65 per 1,000 gallons.
30,000 gallons per month and up:	$.85 per 1,000 gallons.

It is agreed that the obligation of Sanlando Utilities Corporation to implement such an inverted rate structure shall be subject to the prior approval of the Florida Public Service Commission. Petitioners agree to join with Sanlando Utilities Corporation in preliminary discussions with the staff of the Public Service Commission, and selected individual members of the Commission (to the extent permitted by law), to determine if the Commission and its staff would be receptive to the approval of rate changes such as those specified herein for the purposes of encouraging water conservation, generating capital for the construction of the improvements specified in Subparagraphs (3)(i) and (ii) below, and for the operation and maintenance of reclaimed water processing and distribution facilities. If these preliminary discussions provide positive indications that there is a reasonable likelihood that a formal application for such rate changes (or similar rate changes) will be approved by the Commission, Sanlando will do the following:

(i) The charges set forth in this paragraph, shall be requested by Sanlando Utilities Corporation in a rate proceeding which Sanlando Utilities Corporation shall initiate no later than nine (9) months subsequent to the effective date of this stipulation. It is agreed by the parties hereto that the rate changes initially sought through the Commission shall be not less than those shown above.

SPECIFIC CONDITIONS:

(ii) Sanlando Utilities Corporation shall diligently pursue and advocate these rate changes before the Public Service Commission.

(iii) Sanlando Utilities Corporation shall advocate these rate changes pursuant to Section 403.064(6), Florida Statutes, which provides that " The Public Service Commission shall allow utilities which implement reuse projects to recover the full cost of such facilities through their rate structure."

4. SANLANDO UTILITIES CORPORATION, or any successor operating pursuant to the Operating Permit, will do the following:

(i) By December 31, 1995, improve the Wekiva wastewater plant so that this plant meets all regulatory standards for providing and distributing reclaimed water for golf course irrigation purposes in sufficient quantities to irrigate the Sweetwater Club, Wekiva Hunt Club and Sabal Point Golf courses. Such quantities shall not be less than 1.8 MGD.

(ii) By December 31, 1996, have installed distribution lines necessary for the delivery of reclaimed water to the boundary of each of the three (3) golf courses identified in subparagraph (i) above.

(iii) In the event that the rate structure of Sanlando Utiltiies Corporation is not sufficient to fund the construction of improvements by the times required as identified in subparagraphs (i) and (ii) above because the Florida Public Service Commission fails to approve the inverted rate structure outlined in Specific Condition 3 or some alternative rate structure, which will provide the funding for the construction of said improvements, the Department shall provide Sanlando Utilities Corporation, or any successor operating under this permit, with the opportunity to demonstrate to the Department, that it lacks sufficient revenue from customer rates to fund the construction and complete these requirements on the schedule provided herein. Should Sanlando Utilities Corporation, or its successor, satisfy the Department that it lacks sufficient revenue to make these improvements, the Department will grant extensions of time, or such other relief as is appropriate under the circumstances.

5. Sanlando Utilities Corporation and any successor to Sanlando Utilities Corporation, and any successor operating pursuant to this Operating Permit, agrees to install one (1) additional water quality monitoring station to be located within the Wekiva River at a location immediately downstream of the confluence of Sweetwater Creek/Cove Lake and the Wekiva River. The precise location of this monitoring station shall be fixed in consultation with Friends of the Wekiva and Florida Audubon Society. Parameters to be monitored at this location shall be the same as those stated in Specific Condition 2 above.

Attention: Hubert Jacques
Executive Vice President

SPECIFIC CONDITIONS:

6. A mixing zone for Dissolved Oxygen (DO) is granted for this facility. The zone shall extend from the upstream outfall (East) to a point approximately 1,000 feet downstream from the outfall at the foot bridge off Wild Oak Circle.

7. The facility shall be operated to provide compliance with the following effluent limits at the meter box:

Flow	2.9	MGD annual average
$CBOD_5$	5.0	mg/L monthly average
TSS	5.0	mg/L monthly average
NH_3 as N	2.5	mg/L monthly average
TP as P	0.40	mg/L monthly average
DO	6.0	mg/L daily minimum

8. Monitoring of the existing ground water monitoring wells shall be continued as established in the previously approved Ground Water Monitoring Plan through December 1991.

9. The maintenance and operation log required pursuant to Rule 17-602.360(e), F.A.C., shall be stored on-site in a weather resistant structure.

10. Operational difficulties, which may cause or result in non-compliance with the requirements of this permit, shall be immediately reported to both the local pollution control program and to the Department.

11. The permittee shall submit the prescribed application and supporting data for an operation permit no later than sixty (60) days prior to the expiration date of this permit.

12. Domestic residual (sludge) disposal shall be in accordance with Rule 17-640, F.A.C. Residuals shall be analyzed quarterly and the information submitted to the Department. Agricultural land use plans shall be submitted annually on forms approved by the Department. In accordance with this rule, the permittee is responsible for compliance with the requirements of Department rules as they relate to land application of residuals.

13. The treatment plant effluent shall be adequately chlorinated at all times so as to maintain a minimum 0.5 mg/L total chlorine residual after a minimum contact period of 15 minutes (based on peak hourly flow) or as required to achieve the basic disinfection criteria of Rule 17-600.440(4), F.A.C. Effluent shall be dechlorinated to reduce chlorine residual to not more than 0.01 mg/L prior to discharge to Sweetwater Creek.

14. The permittee will promptly notify the Department upon sale or legal transfer of the permitted facility. In accordance with General Condition #11 of this permit, this permit is transferable only upon Department approval. The new owner must apply, by letter, for a transfer of permit within thirty (30) days.

Attention: Hubert Jacques
Executive Vice President

SPECIFIC CONDITIONS:

15. The permittee shall submit to the Department, at least (180) days prior to the expiration date of this permit a "Surface Water Impact Summary Report" (SWISR) summarizing water quality impacts and the previous five (5) years water quality monitoring data, in numerical and graphical form and indicating any changes to the operation, processes or loadings to the receiving stream. This data includes all effluent data and any monitoring data which may have been collected on the receiving water.

    The Department will evaluate the information submitted to determine if water quality of Sweetwater Creek and/or Cove Lake is being degraded below the water quality standards established for Class III waters. If adverse water quality impacts attributable to the discharge are detected, the Department will require an additional level of treatment and/or implementation of water reuse.

16. The permittee shall harvest the created wetland system south of Wekiva Springs road when the removal efficiency of the plants becomes less than 25% when measured on a yearly basis. To determine removal rates of nitrogen and phosphorus, water quality shall be monitored for total nitrogen and total phosphorus prior to, and exiting the wetland. One (10 year after issuance of this permit and ever twelve (12) months thereafter, the permittee shall review the performance of the system and provide this information (along with any recommendation to harvest) to the Department for review.

17. During the life of this permit, the permittee shall periodically monitor the Sweetwater Creek/Cove Lake system for nuisance plants and in consultation with the Department, will consider selective herbicides which will not harm designated plants. In addition, the Department may require the manual removal of nuisance plants, related to the nutrient loading in the discharge.

ISSUED 7-10-92

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

for J. M. McAward, P.E.
A. Alexander
District Director
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803-3767

Conklin, Porter and Holmes
ENGINEERS, INC.
1104 E. ROBINSON STREET
ORLANDO, FLORIDA 32801
TEL 407-425-0452
FAX #407-648-1036

H 7/13/92

ORIG → Hamp
C: HJ

SANLANDO UTILITIES CORPORATION - REUSE WATER SYSTEM
PRELIMINARY ANALYSIS AND DOCUMENTATION
CPH PROJECT NO. S1614.01

INTRODUCTION

This report has been compiled at the request of Sanlando Utilities Corporation to summarize and update previous letters and reports. It is also noted that when finalized, this update will assist the Utility in complying with the specific conditions in the proposed operating permit for the Wekiva Hunt Club Wastewater Treatment Plant. It could also serve as a starting point in the planning of a utility-wide reuse system with the ultimate goal of eliminating direct discharge from the wastewater treatment plant to the waters of the State.

BACKGROUND

The current request for additional studies relating to the reuse system for Sanlando Utilities Corporation is outlined in a June 26, 1992 letter to William R. Holmes, P.E., Conklin, Porter and Holmes - Engineers, Inc. from Hubert Jacques, Vice President, Sanlando Utilities Corporation, (copy attached in appendix.) The letter request refers to a number of previous studies, and widens the scope to include certain other potential bulk users such as apartment complexes, residential and office complexes, retail and commercial centers and schools. Previous studies dealt only with the three golf courses in the vicinity: the Sweetwater County Club Golf Course, the Wekiva Golf Course, and the Sable Point Golf Course. In order to facilitate the addition of other potential users, the Utility has furnished a listing and summary of irrigation meters grouped in sub-areas throughout the utility service area. This listing also includes the mean daily usage of the users and the sum of the meters within each of the smaller sub areas. A map was also provided showing the location of the sub areas with map area identification related to each individual user.

The previous studies provided for the Utility were performed in direct response to questions at the time of their initiation and were primarily related to effluent disposal alternatives at the plant site, to responses to consumptive use questions raised by the regulatory agencies during the permitting of plant expansions, and to the need to reduce the discharge of nutrients to Sweetwater Creek. Nutrient assimilation models (FDER River Model) were run and the oxygen sag response to BOD levels were determined at various flow levels in Sweetwater Creek. Water

samples for the various nutrients of concern were collected at several locations on the creek, and are still being collected for compliance documentation to the various plant expansions and the ongoing direct discharge to Sweetwater Creek. The work referred to was started in mid-1985 and the first report reviewing the potential cost of providing effluent to the three golf courses, and also to the power easement area was provided in July 1986. This study was updated and expanded in August 1989 and dealt specifically with the Wekiva Golf Course. The study was revised again October 1989 to include the Sweetwater County Club Golf Course. In July 1990 and February 1991, letters were written in response to specific questions asked by representatives of the Wekiva Golf Course and the Sable Point County Club regarding certain conditions of the potential reuse system and what limitations would be on the system relative to effluent use on the referenced golf courses.

As a follow-up to earlier studies, and to requests for information from the golf courses, the Water Management District and the FDER (as related to consumptive use permits for the respective golf courses), we were directed to initiate a study in February 1991 to estimate capital costs and operating costs for various pumping and storage configurations for each of the golf courses alone, for two of the golf courses and for all three of the golf courses. This work initially provided for a 12-hour and 24-hour pumping period and was later revised to a 16-hour pumping period with and without storage on the plant site or on the golf courses.

The February/March 1991 study included considerations from FDER, 17-610, Part III, regarding reuse requirements for public access areas. A transmission main route was outlined and updated from previous studies on the Wekiva Wastewater Treatment Plant, to the Sweetwater County Club Golf Course and the Sable Point Golf Course. A schematic design was developed for rechorination, storage and pumping facilities at the Wekiva Wastewater Treatment Plant site.

JULY 1992 UPDATE

In response to the Utilities request, and the widened scope of providing reuse to various other commercial users, the previous study from March 6, 1991 involving a 16-hour pumping scenario has been updated to provide both pumping and storage on the Wekiva Wastewater Treatment Plant site. Storage and some pumping under pressure will be required at the treatment plant site to allow random demand similar to a water system to occur. The transmission mains leaving the site must be pressurized at all times and back-up storage must be provided to meet peak demands and to meet demands at times when the plant flow is the lowest (the 8-hour, nighttime operating period.) Because of the operation protocol, the reuse water may only be diverted into the storage or pumping facilities when the Class "C" operator is on site for the 16-hour day shift, seven days a week. The lead or chief operator must be a Class "B" or higher.

Exhibit A shows some of the plant site modifications that might be required for the reuse system. In reviewing the previous studies, it was determined that an average flow of about 360,000 gallons-per-day was being provided for each golf course. This rate was compared with current experiences from the City of Sanford system, where two courses are using effluent, one designed for total coverage for maximum use of effluent and another designed as a standard center fairway system plus green and tee sprinklers. The 360,000 gallon-per-day average is realistic for planning purposes, although demand during non-rain periods in the hot summer months can push into the 600,000 gallon-per-day range. This system as proposed would result in slightly over 1 MGD being allocated to the three golf courses on an annual average basis, and another 225,000 gallons to commercial users in the vicinity of the main transmission route to the respective golf courses.

It is noted that the mean irrigation meter list indicated approximately 432,000 gallons-per-day being used by the sum of the irrigation meters in the system, but many of these meters are not in close proximity or reasonably accessible to the main transmission line. Even those users that are in the proximity of the line would require separate distribution mains to be installed along the street right-of-ways adjacent to the existing water system. This additional expense for design, permitting and installation would be in the range of $20.00 to $25.00 per linear foot, considering a minimum restoration type project where the open cut of roadways was held to minimum. The current study does not provide sufficient detail in determining the linear footage or preliminary pipe routes required for the local neighborhood reuse systems, but should serve as a discussion item to determine the scope of the future program. It is our opinion that once a neighborhood system is started, you will most likely pickup a large number of local users in addition to the current irrigation meters, especially if the rates are advantageous. The next phase of the study could involve a more detailed neighborhood analysis along the proposed route for the existing main line to the golf courses and a projection made to the number of potential users within the adjacent neighborhoods. Such an analysis may result in a slight shifting of the main line to make it more convenient to install the neighborhood systems rather than just trying to keep the main line in an area where minimal restoration would be required. For example, it would be placed on the side of the main road that would allow side runs into neighborhood streets rather than boring and jacking across the main boulevard, like Wekiva Trail East, to serve a number of streets on the north side of the boulevard. An examination of your existing meter data base within certain areas of the system will allow an expanded user projection to be developed. This would be the first phase of an area wide reuse system or at least a system large enough to assure maximum take back of available water from the treatment plant. It is felt that you could easily exceed your take back capacity with such a system and "make-up" water might even be required at certain times in order to meet peak demands. The availability of water will be the limitation once it is started, not the availability of users.

Conklin, Porter and Holmes
ENGINEERS, INC.
104 E. ROBINSON STREET
ORLANDO, FLORIDA 32801
TEL 407-425-0452
FAX #407-648-1036

In considering local users, the author is knowledgeable of at least two private 4-inch wells that are used to irrigate the mediums on Hunt Club Boulevard, both north and south. We are not sure what is used in the center section or if it is actually irrigated, but this would appear to be an additional effluent disposal area, that could easily be made available for a system hookup.

Conclusion

Based upon this information developed to date, it is our opinion that a system designed to maintain pressure for local system reuse on demand as well as for the transmission to the respective golf courses is the most advantageous. This system would provide for storage and pumping as shown in the Exhibit A. The cost analysis as outlined in Reuse Cost Table II shows the total capital cost for each golf course along Wekiva and Sweetwater County Club together, as well as for all three courses. The cost for the three course system is $977,200.00 with a annual operation cost of $20,421.00. The total cost with storage on the golf courses is higher, $1,150,000, (as shown in Table III) than with plant site storage. This option would not allow other local users to hook on. Table I is basically the result from the March 6, 1991 study.

There are many other alternatives such as combinations of the above, with storage initially on the golf courses as required or brought on line and then add smaller storage at a later date when the local reuse system is initiated.

After you review this data, we are available to discuss alternatives and further program planning.

sanrep.710

Table I

REUSE COST SUMMARY TABLE (16-HOUR/DAY) - NO STORAGE

REUSE SITE	RATE (GPM)	ONSITE (1) CAPITAL COSTS	OFFSITE(2) CAPITAL COSTS	TOTAL CAPITAL COSTS	ONSITE OPERATING COST (3) YEARS
Sweetwater County Club	345	162,000	209,000	371,000	6,012
Wekiva	345	160,000	29,000	189,000	4,376
Sable Point	345	136,000	203,000	339,000	4,367
SWCC & Wekiva	688	182,000 91,200EA	199,000(S) 16,000(W) 215,000Ttl	290,200(S) 107,200(W) 397,400Ttl	11,502 5,751EA
All Three	1042	235,200 78,400EA	199,000(S) 16,000(W) 203,000(SP) 418,000Ttl	277,400(S) 94,400(W) 281,400(SP) 653,200Ttl	16,921 5,640EA

1) Capital cost on wastewater treatment plant site includes 20% for Engineering, Administration and Contingency. Capital items include plant piping modification, a chlorine contact chamber, wetwell with pumps and electrical, onsite discharge piping, chlorination equipment and test equipment.

2) Offsite costs include piping installation to golf course(s), including boring and jacking restoration, flow meter and 20% E.A.C. factor.

3) Operating costs include labor, chlorine and power cost. Power costs consider on and off peak period charges as well as on peak demand charge (from previous study at wastewater treatment plant.)

4) A. On Golf Courses - "Crom" type tank.
360,000 Gallons each Course $165,600.00

B. Other storage arrangements may be considered on a case-by-case basis by golf course.

C. With reuse, each course would need pumping station and irrigation system modifications (approximately) $50,000.00 upper end planning cost. Sable Point may not need a new pump station.

5) Note: Without storage on the plant site, the system would not be able to provide on demand flow to other (non golf course) users along the route.

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Table II

REUSE COST SUMMARY TABLE (16-HOUR/DAY) (WITH ONSITE STORAGE)					
REUSE SITE	RATE (GPM)	ONSITE (1) CAPITAL COSTS	OFFSITE(2) CAPITAL COSTS	TOTAL CAPITAL COSTS	ONSITE OPERATING COST (3) YEARS
Sweetwater County Club	345	345,600	209,000	554,600	7,412
Wekiva	345	343,600	29,000	372,600	5,776
Sable Point	345	319,600	203,000	522,600	5,767
SWCC & Wekiva	688	465,600 232,800EA	199,000(S) 16,000(W) 215,000Ttl	431,800(S) 248,800(W) 680,600Ttl	13,902 6,951EA
All Three	1042	559,200 186,400EA	199,000(S) 16,000(W) 203,000(SP) 418,000Ttl	385,400(S) 202,400(W) 389,400(SP) 977,200Ttl	20,421 6,807EA

1) Capital cost on wastewater treatment plant site includes 20% for Engineering, Administration and Contingency. Capital items include plant piping modification, a chlorine contact chamber, wetwell with pumps and electrical, onsite storage and low head pumps with wetwell, onsite discharge piping, chlorination equipment and test equipment.

2) Offsite costs include piping installation to golf course(s), including boring and jacking restoration, flow meter and 20% E.A.C. factor.

3) Operating costs include labor, chlorine and power cost. Power costs consider on and off peak period charges as well as on peak demand charge (from previous study at wastewater treatment plant.)

4) With reuse, each course would need pumping station and irrigation system modifications (approximately) $50,000.00 upper end planning cost. *Sable Point may not need a new pump station.*

tab2.710

Table III

REUSE COST SUMMARY TABLE: (16-HOUR/DAY)
(WITH STORAGE ON GOLF COURSE)

REUSE SITE	RATE (GPM)	ONSITE (1) CAPITAL COSTS	OFFSITE(2) CAPITAL COSTS	TOTAL CAPITAL COSTS	ONSITE OPERATING COST (3) YEARS
Sweetwater County Club	345	162,000	374,600	536,600	6,012
Wekiva	345	160,000	194,600	354,600	4,376
Sable Point	345	136,000	368,600	504,600	4,367
SWCC & Wekiva	688	182,400 91,200EA	364,600(S) 181,600(W) 546,200Ttl	455,800(S) 272,800(W) 728,600Ttl	11,502 5,751EA
All Three	1042	235,200 78,400EA	364,600(S) 181,600(W) 368,600(SP) 914,800Ttl	443,000(S) 260,000(W) 447,000(SP) 1,150,000Ttl	16,921 5,640EA

1) Capital cost on wastewater treatment plant site includes 20% for Engineering, Administration and Contingency. Capital items include plant piping modification, a chlorine contact chamber, wetwell with pumps and electrical, onsite discharge piping, chlorination equipment and test equipment.

2) Offsite costs include piping installation to golf course(s), storage, including boring and jacking restoration, flow meter and 20% E.A.C. factor.

3) Operating costs include labor, chlorine and power cost. Power costs consider on and off peak period charges as well as on peak demand charge (from previous study at wastewater treatment plant.)

4) A. On Golf Courses - "Crom" type tank
360,000 Gallons each Course $165,600.00

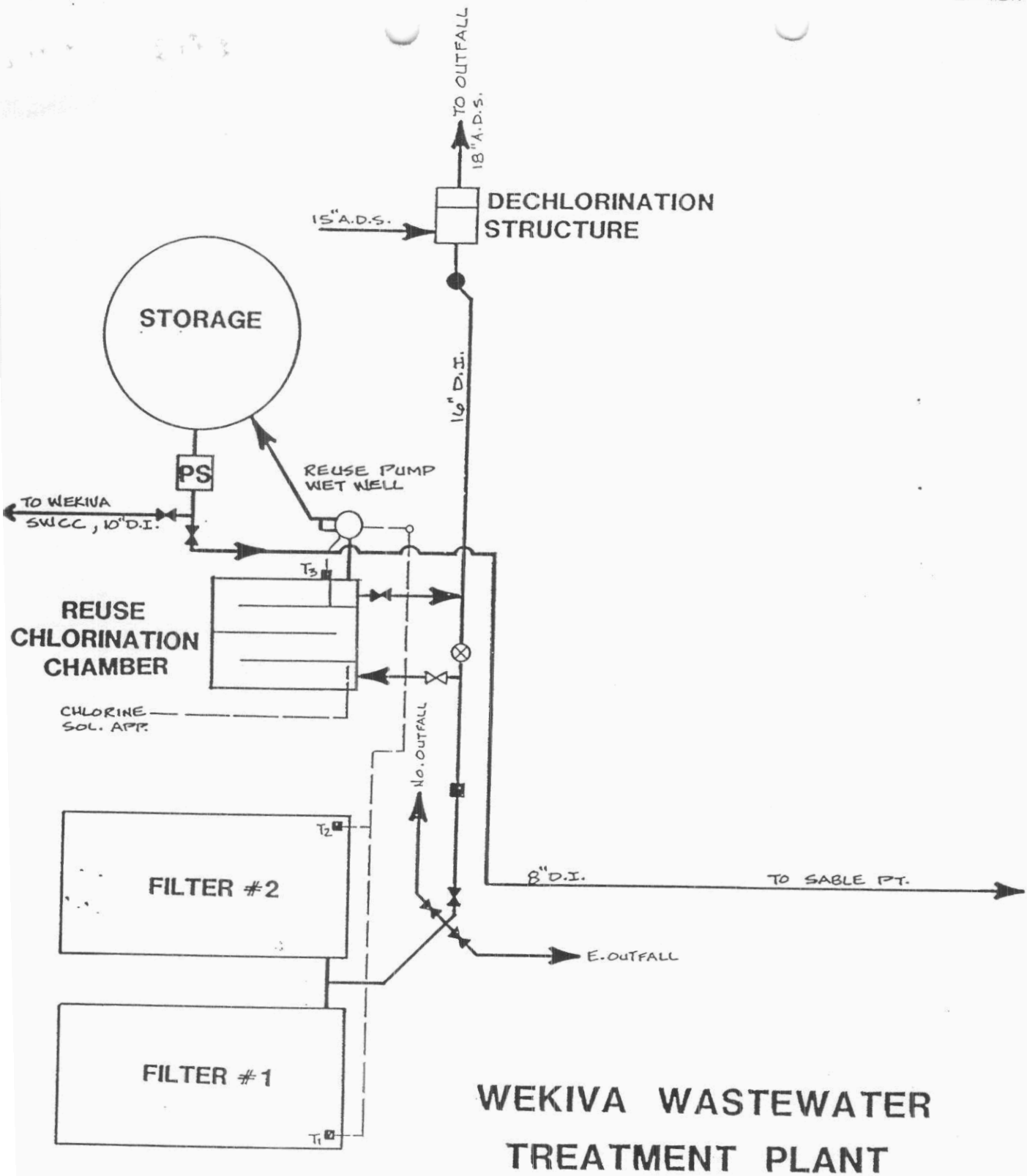
B. Other storage arrangements may be considered on a case-by-case basis by golf course.

C. With reuse, each course would need pumping station and irrigation system modifications (approximately) $50,000.00 upper end planning cost. *Sable Point may not need a new pump station.*

5) Note: Without storage on the plant site, system would not be able to provide an on demand flow to other minor users along the route.

tab3.710

EXHIBIT "A"



WEKIVA WASTEWATER TREATMENT PLANT

Conklin Porter and Holmes ENGINEERS, INC.
1104 EAST ROBINSON STREET
ORLANDO, FLORIDA, 32801
TEL 407-425-0452

Appendix

Orlando Utilities Corporation

S1614.01

June 26, 1992

Mr. William Holmes
Conklin, Porter & Holmes, Engineers
1104 E. Robinson St.
Orlando, Florida 32801

Dear Mr. Holmes:

This letter will confirm our telephone conversation of this date regarding reuse of treated effluent from the Wekiva Hunt Club treatment facility.

By July 10, 1992 please have completed a preliminary report that:

- recommends delivery of effluent to Wekiva Golf Course, Sweetwater County Club and Sabal Point Golf Course; and specific potential bulk users such as apartment complexes, residential and office condominium complexes, retail and commercial centers, and schools;

- reviews and updates the quantities of reclaimed wastewater required by the three golf courses and any specifically identified bulk user derived from the above;

- "dust-offs" your most recent projection of capital and operating costs.

Your cost elements for effluent reuse at the golf courses should include alternative costs for on-site and off-site storage and provide for no additional operator shift requirements beyond our existing 16 hour day.

As we discussed, as soon as possible, I will provide you with a list and maps of large general service customers that have irrigation meters.

Please charge your expenses to the existing reuse project member S1614.01. If you need additional information from me, please call.

Sincerely,

Hubert Jacques

Hubert Jacques
Vice President

HJ:kc
cc: H. Conley

RECEIVED
JUN 29 1992
CONKLIN, PORTER & HOLMES
ORLANDO, FLORIDA

P.O. BOX 3684 • LONGWOOD, FLORIDA 32791 • Phone (407) 788-3000

LOWNDES, DROSDICK, DOSTER, KANTOR & REED

PROFESSIONAL ASSOCIATION

ATTORNEYS AT LAW

215 NORTH EOLA DRIVE

POST OFFICE BOX 2809

ORLANDO, FLORIDA 32802-2809

TELEPHONE (407) 843-4600

TELECOPIER (407) 423-4495

March 9, 1993

DEPOSIT TREAS. REC. DATE

C649 MAR 1 : '93

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399

WS397

DOCUMENT NUMBER-DATE
02671 MAR 10 93
FPSC-RECORDS/REPORTING

Re: Sanlando Utilities Corporation Petition for Limited Proceeding to Implement Water Conservation Plan (the "Petition")

Dear Mr. Tribble:

Enclosed are an original and fifteen (15) copies of the above-referenced Petition along with a check in the amount of $2,250.00, payable to the Public Service Commission, in payment of the filing fee.

Sanlando Utilities Corporation is filing the Petition pursuant to PSC Order No. 92-1356-FOF-WS, issued on November 23, 1992, mandating that the Utility file a limited proceeding to implement the water

SANLANDO UTILITIES CORPORATION
POST OFFICE BOX 3884
LONGWOOD, FL 32791

FIRST UNION First Union National Bank of Florida Winter Park, Florida 32789

23704

March 08, 1993

83-751/831
Branch 410

PAY $2,250.00 DOLLARS $ 2,250.00

TO THE ORDER OF FLORIDA PUBLIC SERVICE COMMISSION

Gary H. Bullock

⑈023704⑈

REDACTED