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May 17, 1993

Mr. Steve Tribble  
Director of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0870

RE: Docket No. 911082-WS  
Proposed new, revised and repealed rules pertaining to water  
and wastewater regulation.

Dear Mr. Tribble:

Enclosed for filing on behalf of Florida Cities Water Company  
in the above docket are an original and 15 copies of the following:

- 5306-93** 1. Florida Cities Water Company's Response to Order  
Establishing Procedures to be Followed at Rulemaking  
Hearing; and
- 5307-93** 2. Florida Cities Water Company's Supplemental Comments  
regarding the "Response to Opposition Comments of the  
Florida Cities Water Company to the Rule Revision  
Proposal of the Florida Fire Sprinkler Association".

Please acknowledge receipt of the foregoing by stamping the  
enclosed extra copy of this letter and returning same to my  
attention. Thank you for your assistance.

Sincerely,

*Wayne L. Schiefelbein*

Wayne L. Schiefelbein

ACK  \_\_\_\_\_  
 AE \_\_\_\_\_  
 AD  \_\_\_\_\_  
 CD \_\_\_\_\_  
 CMJ \_\_\_\_\_  
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 FRI  \_\_\_\_\_  
 SJC  \_\_\_\_\_  
 WLS  \_\_\_\_\_  
 OTH \_\_\_\_\_

WLS/jhg

cc: All interested persons listed  
on FPSC docket mailing list.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

**FLORIDA CITIES WATER COMPANY'S SUPPLEMENTAL COMMENTS  
REGARDING THE "RESPONSE TO OPPOSITION COMMENTS  
OF THE FLORIDA CITIES WATER COMPANY TO THE RULE REVISION  
PROPOSAL OF THE FLORIDA FIRE SPRINKLER ASSOCIATION"**

**DOCKET NO. 911082-WS**

DOCUMENT NUMBER-DATE

05307 MAY 17 88

FPSC-RECORDS/REPORTING

Florida Cities Water Company (FCWC) does not oppose the installation of or question the effectiveness of fire sprinkler systems. FCWC recognizes that these systems have the potential to save lives and property. On this point we have no disagreement with the Florida Fire Sprinkler Association.

FCWC disagrees that standby water fees are a deterrent to the installation of fire sprinkler systems and that the level of cross connection control should be controlled by anyone other than the water purveyor. Standby water fees are not the deterrent preventing the installation of fire sprinkler systems. The lack of local and state mandates along with the high capital investment of fire sprinkler systems are the deterrents.

Mr. Dewar states that many political jurisdictions relax the fire hydrant spacing requirements when fire sprinklers are used in the area. FCWC's experience has been that hydrant spacing is not reduced by the installation of fire sprinkler systems. Water mains, in many areas, are sized based on the zoning of the property regardless of whether fire sprinkler systems will be installed as part of the building construction. Contrary to Mr. Dewar's claims, FCWC does understand fire sprinkler system design and operation. We acknowledge his expertise in this field but we also have the knowledge and experience of dealing with local and state regulations regarding these matters. The supposition that installation of a fire sprinkler system will reduce the size of the water main to serve the area is not borne out by FCWC's experience.

Mr. Dewar says that FCWC requires unnecessary, redundant and very costly cross connection control far above what is needed. FCWC has a written cross connection control program that has been submitted to FDER and meets all the requirements of 17-555 F.A.C. These devices are installed at the point of service, usually at the road right-of-way/property line. FCWC's cross connection control program allows three types of cross connection control devices based on the cross connection exposure. The very three devices that Mr. Dewar references in his comments, reduced pressure type, double check valve type and air gaps, are allowed by FCWC. Air gaps are not an option in a closed system such as a fire sprinkler system. That leaves reduced pressure and double check valve type devices. FCWC requires reduced pressure devices only when a fire sprinkler system has the potential to use an auxiliary source of water and/or when in-line additives are used. Virtually every sprinklered building, with the exception of single family residences, has a siamese or fire department connection to allow the fire department to pump water into the fire sprinkler system. The fire department itself is often the auxiliary source of water, via their pumper truck. The water used from the fire truck may not be potable, creating a source of contamination for the water purveyor. FCWC also requires a fire line meter assembly along with the cross connection control device. The fire line meter is used to account for water which is consumed by the fire sprinkler system during testing or in case of a fire. Mr. Dewar suggests that this equipment somehow compromises the operation of the fire sprinkler

system. While there is some pressure loss in this equipment, a properly designed fire sprinkler system would not be compromised by the inclusion of this equipment. All equipment used for the fire line meter/cross connection control assembly is listed by Underwriters Laboratories and is approved by Factory Mutual. There are not any unnecessary valves or meters in these facilities. Mr. Dewar's emphatic statements to the contrary are simply untrue.

FCWC believes that the public health can not and should not be compromised by allowing anyone other than the water purveyor to establish what level of cross connection control is required. The water purveyor is responsible for providing safe, efficient and sufficient service. Since it has the responsibility for that end result, it must have the authority to determine what reasonable measures are necessary to obtain that end result. AWWA's Manual M-14 provides minimum guidelines only and should not be used to limit the authority of the water purveyor to require more stringent cross connection control as may be necessary to protect the public health.

In summary, FCWC does not believe that standby water fees are a deterrent to the installation of fire sprinkler systems; high capital investment and lack of local and state requirements are the deterrent. FCWC has not seen the reduced infrastructure needs for water distribution systems that are envisioned in the Florida Fire Sprinkler Association's Report. FCWC is firmly opposed to anyone other than the water purveyor establishing standards for cross connection control.