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DOCKET NO.: 950495-WS - [Southern States Utilities, Inc. - Burnt Store Water System, Deep Creek Water System, Leisure Lakes Water System, Marco Island Water System, Marco Shores Water System]

WITNESS: Direct Testimony of Gary A. Maier, P.E., Florida Department of Environmental Protection, Appearing on Behalf of the Staff of the Florida Public Service Commission

DATE FILED: February 26, 1996

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FPSC-RECORDS/REPORTING

1 DIRECT TESTIMONY OF GARY A. MAIER, P.E.

2 Q. Please state your name and business address.

3 A. Gary A. Maier, Department of Environmental Protection, 2295 Victoria
4 Avenue, Suite 364, Fort Myers, Florida 33901.

5 Q. Please state a brief description of your educational background and
6 experience.

7 A. I received a B.S. degree in Chemical Engineering with high honors from
8 the University of Illinois at Chicago in 1976, and a Juris Doctor degree with
9 honors from the University of Florida in 1989. I have six years of experience
10 working for the Department of Environmental Protection, eight years of
11 experience working for Florida Power and Light Company, and two years of
12 experience working for the Institute of Gas Technology.

13 Q. By whom are you presently employed?

14 A. I am employed by the Florida Department of Environmental Protection.
15 (FDEP)

16 Q. How long have you been employed with the FDEP and in what capacity?

17 A. Six years. Presently, I am the supervisor of the FDEP's South District
18 Drinking Water Program. Previously, I was a supervisor in the South District
19 Air Pollution Program; and before that, an air permitting engineer in the
20 FDEP's Tampa office.

21 Q. What are your general responsibilities at the FDEP?

22 A. I am responsible for regulating all of the Public Water Systems in
23 FDEP's South District, except for those in Lee County. Public Water Systems
24 in Lee County are regulated by the HRS Lee County Public Health Unit.

25 Q. Are you familiar with the Southern States Utilities, Inc. water systems

1 | located in the South District?

2 | A. Yes, except for Lehigh.

3 | Q. Were these systems inspected by you, or by FDEP staff under your
4 | supervision?

5 | A. Yes, except for Lehigh.

6 |

Burnt Store Water System

7 | Q. Does the utility have a current construction permit from the FDEP for
8 | the Burnt Store Water System (Burnt Store)?

9 | A. The utility does not have a current active construction permit from the
10 | FDEP South District Drinking Water Program. I do not know if the utility has
11 | a current construction permit from any other section or division within FDEP.

12 | Q. Are the utility's treatment facilities and distribution system
13 | sufficient to serve its present customers?

14 | A. I am not aware of any evidence that would cause me to conclude that the
15 | treatment facilities and distribution system are not currently sufficient to
16 | serve the present customers.

17 | Q. Does the utility maintain the required 20 psi minimum pressure
18 | throughout the distribution system?

19 | A. I am not aware of any evidence that would cause me to conclude that the
20 | utility does not currently maintain the required 20 psi minimum pressure
21 | throughout the distribution system.

22 | Q. Does the utility have an adequate auxiliary power source in the event
23 | of a power outage?

24 | A. I am not aware of any evidence that would cause me to conclude that the
25 | utility does not currently have an adequate auxiliary power source in the

1 | event of a power outage.

2 | Q. Are the utility's water wells for Burnt Store located in compliance with
3 | Rule 62-555, Florida Administrative Code?

4 | A. FDEP has delegated water well permitting to the Water Management
5 | Districts. I am not aware of any evidence that would cause me to conclude
6 | that the utility's water wells are not currently located in compliance with
7 | Rule 62-555, Florida Administrative Code.

8 | Q. Does the utility have certified operators as required by Rule 61E12-41,
9 | Florida Administrative Code?

10 | A. Rule 61E12-41, Florida Administrative Code, is under the jurisdiction
11 | of the Department of Business and Professional Regulation. I am not aware of
12 | any evidence that would cause me to conclude that the utility does not
13 | currently have certified operators as required by Rule 61E12-41.

14 | Q. Has the utility established a cross-connection control program in
15 | accordance with Rule 62-555.360, Florida Administrative Code?

16 | A. Yes, the utility has established a cross-connection control program in
17 | accordance with Rule 62-555.360, Florida Administrative Code.

18 | Q. Is the overall maintenance of the treatment plant and distribution
19 | facilities satisfactory?

20 | A. For the treatment plant, yes. FDEP inspector, Mr. Louis LeMaire,
21 | inspected the treatment plant on October 19, 1995, and determined that the
22 | overall condition of the water treatment plant was excellent. FDEP
23 | recommended that the utility consider a periodic finished water storage tank
24 | inspection and cleaning program.

25 | For the distribution facilities, I am not aware of any evidence that

1 | would cause me to conclude that the overall maintenance is not currently
2 | satisfactory.

3 | Q. Does the water produced by the utility meet the State and Federal
4 | maximum contaminant levels for primary and secondary water quality standards?

5 | A. I am not aware of any evidence that would cause me to conclude that the
6 | utility is not currently meeting the State and Federal maximum contaminant
7 | levels for primary and secondary water quality standards.

8 | Q. Does the utility monitor the organic contaminants listed in Rule
9 | 62-550.410, Florida Administrative Code?

10 | A. Yes, the utility monitors for the organic contaminants listed in Rule
11 | 62-550.410, Florida Administrative Code.

12 | Q. Do recent chemical analyses of raw and finished water, when compared to
13 | regulations, suggest the need for additional treatment?

14 | A. No.

15 | Q. Does the utility maintain the required chlorine residual or its
16 | equivalent throughout the distribution system?

17 | A. I am not aware of any evidence that would cause me to conclude that the
18 | utility is not currently maintaining the required chlorine residual or its
19 | equivalent throughout the distribution system.

20 | Q. Are the plant and distribution systems in compliance with all the other
21 | provisions of Rule 62, Florida Administrative Code, not previously mentioned?

22 | A. I am not aware of any evidence that would cause me to conclude that the
23 | plant and distribution systems are not currently in compliance with all the
24 | other provisions of Rule 62, Florida Administrative Code.

25 | Q. Has Burnt Store been the subject of any FDEP enforcement action within

1 | the past two years?

2 | A. The FDEP South District Drinking Water Program has not initiated
3 | enforcement against Burnt Store within the past two years. I do not know if
4 | any other section or division within FDEP has initiated enforcement action
5 | against Burnt Store within the past two years.

6 | Deep Creek Water System

7 | Q. Does the utility have a current construction permit from the FDEP for
8 | the Deep Creek Water System (Deep Creek)?

9 | A. The utility does not have a current active construction permit from the
10 | FDEP South District Drinking Water Program. I do not know if the utility has
11 | a current construction permit from any other section or division within FDEP.

12 | Q. Are the utility's treatment facilities and distribution system
13 | sufficient to serve its present customers?

14 | A. SSU's Deep Creek facility is a consecutive public water system that
15 | purchases 100% of its finished drinking water from another regulated public
16 | water system. The utility has no treatment facilities. I am not aware of any
17 | evidence that would cause me to conclude that the distribution system is not
18 | currently sufficient to serve the present customers.

19 | Q. Does the utility maintain the required 20 psi minimum pressure
20 | throughout the distribution system?

21 | A. I am not aware of any evidence that would cause me to conclude that the
22 | utility does not currently maintain the required 20 psi minimum pressure
23 | throughout the distribution system.

24 | Q. Does the utility have an adequate auxiliary power source in the event
25 | of a power outage?

1 A. Because Deep Creek is a consecutive public water system that purchases
2 100% of its finished drinking water from another regulated public water
3 system, auxiliary power is not required.

4 Q. Are the utility's water wells for Deep Creek located in compliance with
5 Rule 62-555, Florida Administrative Code?

6 A. Because Deep Creek is a consecutive system, the utility has no water
7 wells.

8 Q. Does the utility have certified operators as required by Rule 61E12-41,
9 Florida Administrative Code?

10 A. Rule 61E12-41, Florida Administrative Code, is under the jurisdiction
11 of the Department of Business and Professional Regulation. I am not aware of
12 any evidence that would cause me to conclude that the utility does not
13 currently have certified operators as required by Rule 61E12-41.

14 Q. Has the utility established a cross-connection control program in
15 accordance with Rule 62-555.360, Florida Administrative Code?

16 A. Yes, the utility has established a cross-connection control program in
17 accordance with Rule 62-555.360, Florida Administrative Code.

18 Q. Is the overall maintenance of the treatment plant and distribution
19 facilities satisfactory?

20 A. Because Deep Creek facility is a consecutive system, the utility has no
21 treatment plant.

22 For the distribution facilities, I am not aware of any evidence that
23 would cause me to conclude that the overall maintenance is not currently
24 satisfactory.

25 Q. Does the water produced by the utility meet the State and Federal

1 | maximum contaminant levels for primary and secondary water quality standards?

2 | A. As a consecutive water system the utility does not produce water. I

3 | am not aware of any evidence that would cause me to conclude that the utility

4 | is not currently meeting the State and Federal maximum contaminant levels for

5 | primary and secondary water quality standards.

6 | Q. Does the utility monitor the organic contaminants listed in Rule

7 | 62-550.410, Florida Administrative Code?

8 | A. No, the utility does not monitor, and is not required to monitor, for

9 | the organic contaminants listed in Rule 62-550.410, Florida Administrative

10 | Code.

11 | Q. Do recent chemical analyses of raw and finished water, when compared to

12 | regulations, suggest the need for additional treatment?

13 | A. No.

14 | Q. Does the utility maintain the required chlorine residual or its

15 | equivalent throughout the distribution system?

16 | A. I am not aware of any evidence that would cause me to conclude that the

17 | utility is not currently maintaining the required chlorine residual or its

18 | equivalent throughout the distribution system.

19 | Q. Are the plant and distribution systems in compliance with all the other

20 | provisions of Rule 62, Florida Administrative Code, not previously mentioned?

21 | A. The utility has no plant. I am not aware of any evidence that would

22 | cause me to conclude that the distribution systems are not currently in

23 | compliance with all the other provisions of Rule 62, Florida Administrative

24 | Code.

25 | Q. Has Deep Creek been the subject of any FDEP enforcement action within

1 | the past two years?

2 | A. The FDEP South District Drinking Water Program has not initiated
3 | enforcement against Deep Creek within the past two years. I do not know if
4 | any other section or division within FDEP has initiated enforcement action
5 | against Deep Creek within the past two years.

6 | Leisure Lakes Water System

7 | Q. Does the utility have a current construction permit from the FDEP for
8 | the Leisure Lakes Water System (Leisure Lakes)?

9 | A. The utility does not have a current active construction permit from the
10 | FDEP South District Drinking Water Program. I do not know if the utility has
11 | a current construction permit from any other section or division within FDEP.

12 | Q. Are the utility's treatment facilities and distribution system
13 | sufficient to serve its present customers?

14 | A. I am not aware of any evidence that would cause me to conclude that the
15 | treatment facilities and distribution system are not currently sufficient to
16 | serve the present customers.

17 | Q. Does the utility maintain the required 20 psi minimum pressure
18 | throughout the distribution system?

19 | A. I am not aware of any evidence that would cause me to conclude that the
20 | utility does not currently maintain the required 20 psi minimum pressure
21 | throughout the distribution system.

22 | Q. Does the utility have an adequate auxiliary power source in the event
23 | of a power outage?

24 | A. I am not aware of any evidence that would cause me to conclude that the
25 | utility does not currently have an adequate auxiliary power source in the

1 | event of a power outage.

2 | Q. Are the utility's water wells for Leisure Lakes located in compliance
3 | with Rule 62-555, Florida Administrative Code?

4 | A. FDEP has delegated water well permitting to the Water Management
5 | Districts. I am not aware of any evidence that would cause me to conclude
6 | that the utility's water wells are not currently located in compliance with
7 | Rule 62-555, Florida Administrative Code.

8 | Q. Does the utility have certified operators as required by Rule 61E12-41,
9 | Florida Administrative Code?

10 | A. Rule 61E12-41, Florida Administrative Code, is under the jurisdiction
11 | of the Department of Business and Professional Regulation. I am not aware of
12 | any evidence that would cause me to conclude that the utility does not
13 | currently have certified operators as required by Rule 61E12-41.

14 | Q. Has the utility established a cross-connection control program in
15 | accordance with Rule 62-555.360, Florida Administrative Code?

16 | A. Yes, the utility has established a cross-connection control program in
17 | accordance with Rule 62-555.360, Florida Administrative Code.

18 | Q. Is the overall maintenance of the treatment plant and distribution
19 | facilities satisfactory?

20 | A. For the treatment plant, marginally satisfactory. FDEP inspector, Mr.
21 | Louis LeMaire, inspected the treatment plant on October 10, 1995, and
22 | determined that the aeration tank/clearwell interface may not be sealed
23 | properly. FDEP requested that the utility (a) seal the aeration
24 | tank/clearwell interface to prevent contamination, (b) consider a periodic
25 | finished water storage tank inspection and cleaning program, and (c) consider

1 | a program to continually paint and clean the area of the water treatment
2 | system.

3 | For the distribution facilities, I am not aware of any evidence that
4 | would cause me to conclude that the overall maintenance is not currently
5 | satisfactory.

6 | Q. Does the water produced by the utility meet the State and Federal
7 | maximum contaminant levels for primary and secondary water quality standards?

8 | A. I am not aware of any evidence that would cause me to conclude that the
9 | utility is not currently meeting the State and Federal maximum contaminant
10 | levels for primary and secondary water quality standards.

11 | Q. Does the utility monitor the organic contaminants listed in Rule
12 | 62-550.410, Florida Administrative Code?

13 | A. Yes, the utility monitors for the organic contaminants listed in Rule
14 | 62-550.410, Florida Administrative Code.

15 | Q. Do recent chemical analyses of raw and finished water, when compared to
16 | regulations, suggest the need for additional treatment?

17 | A. No.

18 | Q. Does the utility maintain the required chlorine residual or its
19 | equivalent throughout the distribution system?

20 | A. I am not aware of any evidence that would cause me to conclude that the
21 | utility is not currently maintaining the required chlorine residual or its
22 | equivalent throughout the distribution system.

23 | Q. Are the plant and distribution systems in compliance with all the other
24 | provisions of Rule 62, Florida Administrative Code, not previously mentioned?

25 | A. I am not aware of any evidence that would cause me to conclude that the

1 | plant and distribution systems are not currently in compliance with all the
2 | other provisions of Rule 62, Florida Administrative Code.

3 | Q. Has Leisure Lakes been the subject of any FDEP enforcement action within
4 | the past two years?

5 | A. The FDEP South District Drinking Water Program has not initiated
6 | enforcement against Leisure Lakes facilities within the past two years. I do
7 | not know if any other section or division within FDEP has initiated
8 | enforcement action against Leisure Lakes within the past two years.

9 | Marco Island Water System

10 | Q. Does the utility have a current construction permit from the FDEP for
11 | the Marco Island Water System (Marco Island)?

12 | A. Yes. The utility does have a current active construction permit from
13 | the FDEP South District Water Program. I do not know if the utility has a
14 | current construction permit from any other section or division within FDEP.

15 | Q. Are the utility's treatment facilities and distribution system
16 | sufficient to serve its present customers?

17 | A. I am not aware of any evidence that would cause me to conclude that the
18 | distribution system is not currently sufficient to serve the present
19 | customers.

20 | Q. Does the utility maintain the required 20 psi minimum pressure
21 | throughout the distribution system?

22 | A. I am not aware of any evidence that would cause me to conclude that the
23 | utility does not currently maintain the required 20 psi minimum pressure
24 | throughout the distribution system.

25 | Q. Does the utility have an adequate auxiliary power source in the event

1 | of a power outage?

2 | A. I am not aware of any evidence that would cause me to conclude that the
3 | utility does not currently have an adequate auxiliary power source in the
4 | event of a power outage.

5 | Q. Are the utility's water wells for Marco Island located in compliance
6 | with Rule 62-555, Florida Administrative Code?

7 | A. FDEP has delegated water well permitting to the Water Management
8 | Districts (WMD). FDEP inspector, Mr. Louis LeMaire, inspected Marco Island
9 | on September 26, 1995. He determined that several wells supplying the reverse
10 | osmosis plant might be susceptible to flooding and that the utility should
11 | take appropriate corrective action. Upon further investigation, it was
12 | determined that the wells were properly permitted through the delegated water
13 | management district. It appears there may be some deviation, however, between
14 | the rules and the design.

15 | Q. Does the utility have certified operators as required by Rule 61E12-41,
16 | Florida Administrative Code?

17 | A. Rule 61E12-41, Florida Administrative Code, is under the jurisdiction
18 | of the Department of Business and Professional Regulation. I am not aware of
19 | any evidence that would cause me to conclude that the utility does not
20 | currently have certified operators as required by Chapter 61E12-41.

21 | Q. Has the utility established a cross-connection control program in
22 | accordance with Rule 62-555.360, Florida Administrative Code?

23 | A. Yes, the utility has established a cross-connection control program in
24 | accordance with Rule 62-555.360, Florida Administrative Code.

25 | Q. Is the overall maintenance of the treatment plant and distribution

1 facilities satisfactory?

2 A. Marco Island has two drinking water treatment plants. One is a reverse
3 osmosis plant. The other is a lime softening plant. FDEP inspector, Mr.
4 Louis LeMaire, inspected both treatment plants on September 26, 1995. For
5 both treatment plants, the overall maintenance was acceptable. For both
6 plants, the FDEP requested the utility to (a) consider a periodic finished
7 water storage tank inspection and cleaning program, and (b) verify that there
8 is proper backflow protection between the wastewater facility and the drinking
9 water.

10 For the reverse osmosis plant, the FDEP requested the utility to (a)
11 ensure that all storage tank vents are properly sealed to prevent
12 contamination, (b) install a finer screen on the degassifier blower motor to
13 prevent entrance of insects, (c) remove hose bibbs or install approved
14 backflow prevention devices on hose bibbs, (d) paint the sulfuric acid room,
15 and (e) fix leaking sampling taps.

16 For the lime softening plant, the FDEP requested the utility to (a)
17 install all chlorine gas feed facilities in a separate above-grade room
18 provided with floor level ventilation along with adequate weighing devices and
19 safety equipment, (b) install an alarm system which will sound to indicate
20 loss of chlorine capability or chlorine residual, (c) ensure that all storage
21 tank vents are properly sealed to prevent contamination, (d) be certain that
22 all of the access points to the clearwell are watertight, (e) inspect the
23 storage tanks to make certain that all access points are watertight, and (f)
24 consider a program to continually paint portions and clean the area of the
25 water treatment system.

1 For the distribution facilities, I am not aware of any evidence that
2 would cause me to conclude that the overall maintenance is not currently
3 satisfactory.

4 Q. Does the water produced by the utility meet the State and Federal
5 maximum contaminant levels for primary and secondary water quality standards?

6 A. I am not aware of any evidence that would cause me to conclude that the
7 utility is not currently meeting the State and Federal maximum contaminant
8 levels for primary and secondary water quality standards.

9 Q. Does the utility monitor the organic contaminants listed in Rule
10 62-550.410, Florida Administrative Code?

11 A. Yes, the utility monitors for the organic contaminants listed in Rule
12 62-550.410, Florida Administrative Code.

13 Q. Do recent chemical analyses of raw and finished water, when compared to
14 regulations, suggest the need for additional treatment?

15 A. No.

16 Q. Does the utility maintain the required chlorine residual or its
17 equivalent throughout the distribution system?

18 A. I am not aware of any evidence that would cause me to conclude that the
19 utility is not currently maintaining the required chlorine residual or its
20 equivalent throughout the distribution system.

21 Q. Are the plant and distribution systems in compliance with all the other
22 provisions of Rule 62, Florida Administrative Code, not previously mentioned?

23 A. I am not aware of any evidence that would cause me to conclude that the
24 distribution systems are not currently in compliance with all the other
25 provisions of Chapter 62, Florida Administrative Code.

1 Q. Has Marco Island been the subject of any FDEP enforcement action within
2 the past two years?

3 A. Yes. The FDEP South District Drinking Water Program initiated
4 enforcement against Marco Island on January 24, 1994, for alleged failure to
5 submit a nitrite & nitrate analysis report, and alleged failure to submit a
6 radiological analysis report. The matter was resolved through a consent
7 order. The utility has returned to compliance. The matter was closed on
8 March 18, 1994.

9 I do not know if any other section or division within FDEP has initiated
10 enforcement against Marco Island within the past two years.

11 Marco Shores Water System

12 Q. Does the utility have a current construction permit from the FDEP for
13 the Marco Shores Water System (Marco Shores)?

14 A. The utility does not have a current active construction permit from the
15 FDEP South District Drinking Water Program. I do not know if the utility has
16 a current construction permit from any other section or division within FDEP.

17 Q. Are the utility's treatment facilities and distribution system
18 sufficient to serve its present customers?

19 A. I am not aware of any evidence that would cause me to conclude that the
20 distribution system is not currently sufficient to serve the present
21 customers.

22 Q. Does the utility maintain the required 20 psi minimum pressure
23 throughout the distribution system?

24 A. I am not aware of any evidence that would cause me to conclude that the
25 utility does not currently maintain the required 20 psi minimum pressure

1 | throughout the distribution system.

2 | Q. Does the utility have an adequate auxiliary power source in the event
3 | of a power outage?

4 | A. I am not aware of any evidence that would cause me to conclude that the
5 | utility does not currently have an adequate auxiliary power source in the
6 | event of a power outage.

7 | Q. Are the utility's water wells for Marco Shores located in compliance
8 | with Rule 62-555, Florida Administrative Code?

9 | A. Marco Shores uses surface water, not water wells, as its source of raw
10 | water. This rule, therefore, does not apply.

11 | Q. Does the utility have certified operators as required by Rule 61E12-41,
12 | Florida Administrative Code?

13 | A. Rule 61E12-41, Florida Administrative Code, is under the jurisdiction
14 | of the Department of Business and Professional Regulation. I am not aware of
15 | any evidence that would cause me to conclude that the utility does not
16 | currently have certified operators as required by Rule 61E12-41.

17 | Q. Has the utility established a cross-connection control program in
18 | accordance with Rule 62-555.360, Florida Administrative Code?

19 | A. Yes, the utility has established a cross-connection control program in
20 | accordance with Rule 62-555.360, Florida Administrative Code.

21 | Q. Is the overall maintenance of the treatment plant and distribution
22 | facilities satisfactory?

23 | A. For the treatment plant, overall maintenance is acceptable and
24 | improving. FDEP inspector, Mr. Louis LeMaire, inspected the treatment plant
25 | on April 13, 1995, and determined that the utility should (a) ensure that all

1 vents on storage tanks are completely screened to prevent contamination, (b)
2 remove hose bibbs or install approved backflow prevention devices on all hose
3 bibbs, (c) consider a periodic finished water storage tank inspection and
4 cleaning program, and (d) continue its program to continually paint and clean
5 the area of the water treatment system.

6 For the distribution facilities, I am not aware of any evidence that
7 would cause me to conclude that the overall maintenance is not currently
8 satisfactory.

9 Q. Does the water produced by the utility meet the State and Federal
10 maximum contaminant levels for primary and secondary water quality standards?

11 A. I am not aware of any evidence that would cause me to conclude that the
12 utility is not currently meeting the State and Federal maximum contaminant
13 levels for primary and secondary water quality standards.

14 Q. Does the utility monitor the organic contaminants listed in Rule
15 62-550.410, Florida Administrative Code?

16 A. Yes, the utility monitors for the organic contaminants listed in Rule
17 62-550.410, Florida Administrative Code.

18 Q. Do recent chemical analyses of raw and finished water, when compared to
19 regulations, suggest the need for additional treatment?

20 A. No.

21 Q. Does the utility maintain the required chlorine residual or its
22 equivalent throughout the distribution system?

23 A. I am not aware of any evidence that would cause me to conclude that the
24 utility is not currently maintaining the required chlorine residual or its
25 equivalent throughout the distribution system.

1 Q. Are the plant and distribution systems in compliance with all the other
2 provisions of Rule 62, Florida Administrative Code, not previously mentioned?

3 A. I am not aware of any evidence that would cause me to conclude that the
4 distribution systems are not currently in compliance with all the other
5 provisions of Rule 62, Florida Administrative Code.

6 Q. Has Marco Shores been the subject of any Department of Environmental
7 Protection enforcement action within the past two years?

8 A. Yes. The FDEP South District Drinking Water Program initiated
9 enforcement against Marco Shores on January 24, 1994, for alleged failure to
10 submit a nitrate & nitrate analysis report, and alleged failure to submit a
11 radiological analysis report. The matter was resolved through a consent
12 order. The utility has returned to compliance. The matter was closed on
13 March 18, 1994.

14 I do not know if any other section or division within FDEP has initiated
15 enforcement against Marco Shores within the past two years.

16 Q. Do you have anything further to add?

17 A. Yes. Overall, SSU is one of the best utility companies that I have had
18 the pleasure to regulate. In general, SSU is very cooperative and tries to
19 do all of the right things.

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