

ADDITIONAL REBUTTAL TESTIMONY

STEVE MESSNER

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Q. Could you comment on Mr. Kleinschmidt's statement relative to a fire hydrant maintenance agreement?

A. Gulf Utility entered into an agreement with the Estero Fire Department on March 25, 1992 where Estero agreed to maintain the hydrants within their jurisdiction.

Q. Mr. Elliott in his rebuttal testimony basically said the existing Lee County ordinances require fire service in new developments but not in areas built prior to the effective date of the ordinance. Do you agree with that?

A. Yes, I do.

Q. Mr. Kleinschmidt said Gulf Utility Company is required by Lee County to meet hydrant spacing requirements. What are your comments?

A. The statement is not entirely correct. This is correct in new developments; there are no requirements for utility companies to retrofit or upgrade older areas to meet current standards for fire protection.

Q. Would you comment on Mr. Kleinschmidt's statement relating to unsuccessful fire flow due to debris in the lines?

A. It is company policy that a utility representative accompany the fire department on all flow tests. On

1 tests where we were present, we observed no "debris,
2 nor were we advised by Mr. Kleinschmidt of debris in
3 the lines from unauthorized testing he performed where
4 we were not present. Specifically, the utility was
5 not notified prior to or after the tests in Wildcat
6 Run or the Breckenridge subdivision referred to by Mr.
7 Kleinschmidt. Mr. Kleinschmidt suggests a problem
8 with obtaining fire flow in some cases, however, to
9 date this information has not been communicated to
10 Gulf Utility Company.

11 Q. Would you comment on Mr. Kleinschmidt's statement
12 relating to the effects of reduced pressure on
13 existing buildings?

14 A. A fire sprinkler system is designed based on the
15 results of prerequisite testing and with looping of
16 the system in January 1996, pressures and flows have
17 improved. In any event, a developer of a new project
18 is responsible to make sure that the project has been
19 designed to meet fire protection standards. That is
20 not the utility's responsibility.

21 Q. Mr. Kleinschmidt testified that Gulf Utility does not
22 meet flow requirements in its service area and
23 attached Exhibit BOK-1 as back-up. Would you comment
24 on this?

25 A. Mr. Kleinschmidt included fire flow results from 1995.

1 This is 1997. As stated in previous testimony, Gulf
2 has greatly improved its capabilities of supplying
3 water and pressure in its distribution system through
4 system looping in early 1996. On February 18, 1997,
5 two (2) fire flow tests were conducted by a state
6 certified fire sprinkler contractor. These tests were
7 taken in Gulf Utility's system at the locations deemed
8 deficient by Mr. Kleinschmidt. The results of the
9 test were

	<u>Kleinschmidt</u>	<u>Gulf</u>
<u>Location</u>	<u>1995</u>	<u>1997</u>
U.S.41-Sunny Grove MH Park	939.76 GPM	5642 GPM
	@ 20 psi	@ 20 psi
Breckenridge @ Pensacola	1154.93 GPM	3254 GPM
	@ 20 psi	@ 20 psi

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16 Mr. Kleinschmidt's tests are on pages 1 and 2 of
17 Exhibit_(SM-2), and Gulf's 1997 tests on pages 3 and
18 4. I am not acquainted with how Mr. Kleinschmidt
19 conducted his test, but Gulf's was performed by an
20 independent party, namely a state certified fire
21 sprinkler contractor. Test results provided in
22 Exhibit_(SM-2) are a true representation of fire flow
23 availability based upon current system capabilities.

24 Q. Does this conclude your testimony on this subject?

25 A. Yes, it does.

Exhibit_(SM 2)
Docket No. 960329-WS
Witness: Messner

GULF UTILITY COMPANY

FIRE FLOW TEST

SUNNY GROVE MOBILE HOME PARK

BRECKENRIDGE @ PENSACOLA

Exhibit BOK-1 (Page 1 of 2)

FIRE FLOW REPORT

DATE: 01-19-93 TIME: 1015 HYDRANT#: 02

REPORT BY: T.A. FERNANDES

LOCATION: US-41, NORTH OF NEURO RIVER

SUBDIVISION: ESTERO

BLOCK: C

UTILITY COMPANY: GULF UTILITY

PRESENT AT SITE: T. VERNADES, D. OTT, P. REYNOLDS, S. SELLS, G. HALL

RESIDUAL HYDRANT # USED FOR TEST: 01 LOCATED IN FRONT OF SUNNY GROVE PARK

COEFFICIENT OF DISCHARGE: 0.9 INCHES OUTLET DIAMETER: 3.5 INCHES

STATIC PRESSURE: 70 RESIDUAL PRESSURE: 34 PITOT PRESSURE: 32

FLOW PER MINUTE: 787.02 G.P.M.

FLOW @: 939.78 G.P.M. AT 30 P.S.I. RESIDUAL

UTILITY REP.: G. HALL

FIRE DEPT. REP.: T. FERNANDES

PROPERTY REF.: A. HILTON

FAX #: FEE CHARGED: \$25.00

FEE RECEIVED ON (DATE): FEE IS WAIVED

COMMENTS:

: THE MAP SHOWS THIS TO BE A 10" MAIN. THIS IS THE END OF THE MAIN.

: PUMP BOOSTER STATION LOCATED UP ON PINE RD. IN SAN CARLOS PARK.

:

:

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:

:

SIGNATURE _____

Exhibit BOK-1 (Page 2 of 2)

FIRE FLOW REPORT

DATE: 12-18-95 **TIME:** 1:30 pm **HYDRANT:** AT PENSACOLA CIRCLE

REPORT BY: LT. OTT

LOCATION: BRACKENRIDGE BATH + TENNIS

SUBDIVISION: PHASE IV-B

BLOCK:

UTILITY COMPANY: GULF UTILITIES

PRESENT AT SITE: GARY HALL FF REYNOLDS FF HANNING LY. OTT

RESIDUAL HYDRANT / USED FOR TEST: IAW COURT

COEFFICIENT OF DISCHARGE: 0.9 INCHES **OUTLET DIAMETER:** 2.5 INCHES

STATIC PRESSURE: 60 **RESIDUAL PRESSURE:** 42 **PITOT PRESSURE:** 20

FLOW PER MINUTE: 760.40 G.P.M.

FLOW @ 1154.93 G.P.M. AT 20 P.S.I. RESIDUAL

UTILITY REP.: GARY HALL

FIRE DEPT. REP.: LT. OTT

PROPERTY REP.:

FAX #: **FEE CHARGED:** \$25.00

FEE RECEIVED ON (DATE):

COMMENTS:

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SIGNATURE _____

FLOW TEST DATA SHEET

DATE: 2/19/97 **TIME:** 14:25 **TEMPERATURE:**

JOB NAME: CULP UTILITIES

STREET: U S 41 & CORKSCREW

CITY:

COUNTY: LEE

STATE: FL

TYPE of System:

Gravity: X

Pumps:

Combination



Outlet Smooth end Standard Coupling



Outlet Sharp end Sharp Coupling

General types of hydrant outlets and their configurations of discharge

NOTES **HYDRANT OUTLETS SMOOTH**

HYDRANT FLOW FOR A DURATION OF TEN MINUTES

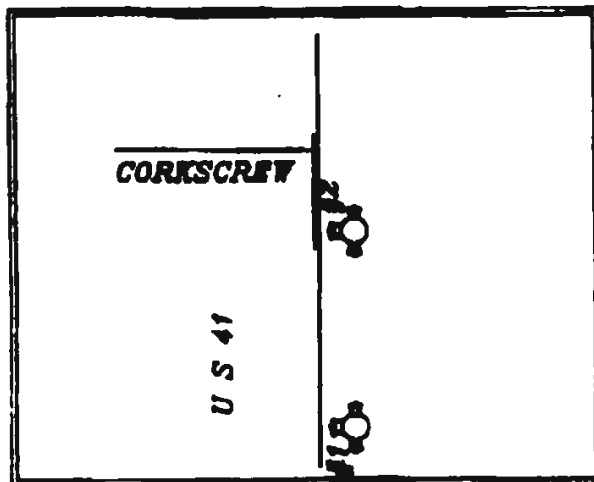
AVAILABLE FLOW APPEARS TO BE UNLIMITED DURATION

Test Conducted By: REGAN MELANSON SET - COASTAL FIRE PROTECTION

Witnessed By: GARY HALL

Copies To:

AREA MAP



OUTLET #1 SIZE:

	1 1/2"	2"	2 1/2"	3"	4"
Static	71				
Resid.	68				
Pilot					
Sub Tot					

OUTLET #2 SIZE:

	1 1/2"	2"	2 1/2"	3"	4"
Static					
Resid.					
Pilot	69				
Sub Tot					

ADJUSTED TOTALS

STATIC: 71
RESID.: 68
FLOW: 1220
 6842 C.P.M. © 20 per

Coastal Fire Protection
 6861 North Park Drive
 P.O. Box 2467
 North Fort Myers, FL 33903
 Phone: (813) 697-7781

Fax: (813) 697-0870

FLOW TEST DATA SHEET

DATE: 2/19/97 TIME: 14:10 TEMPERATURE:

JOB NAME: GULF UTILITIES

STREET: PENSACOLA CIRCLE

CITY:

COUNTY: LEE

STATE: FL

TYPE of System:

Gravity: X

Pumps:

Combination



General type of hydrant outlet and size regardless of discharge

NOTES HYDRANT OUTLETS SMOOTH

HYDRANT FLOW FOR A DURATION OF TEN MINUTES

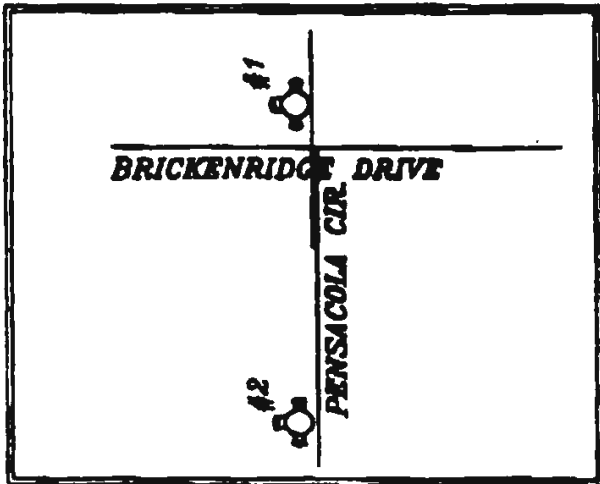
AVAILABLE FLOW APPEARS TO BE UNLIMITED DURATION

Test Conducted By: REGAN MELANSON SET - COASTAL FIRE PROTECTION

Witnessed By: GARY HALL

Copies To:

AREA MAP



OUTLET #1 SIZE:

	1/2"	3/4"	1"	1 1/4"	1 1/2"	2"
Static	66					
Resid.	60					
Pilot						
Sub Tot						

OUTLET #2 SIZE:

	1/2"	3/4"	1"	1 1/4"	1 1/2"	2"
Static						
Resid.						
Pilot	60					
Sub Tot						

ADJUSTED TOTALS

STATIC: 66
 RESID.: 58
 FLOW: 1190
 3254 G.P.M. @ 20 psi

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