

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 040384-WS

SANLANDO UTILITIES CORPORATION

REBUTTAL TESTIMONY OF

SCOTTY L. HAWS

REGARDING THE APPLICATION FOR

AMENDMENT TO CERTIFICATES 247-W AND 189-S

IN SEMINOLE COUNTY, FLORIDA

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

TESTIMONY OF SCOTTY L. HAWS

1 Q. Please state your name and business address.

2 A. My name is Scotty L. Haws and my business address is 200
3 Weathersfield Avenue, Altamonte Springs, Florida.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by a subsidiary of Utilities, Inc., the company which
6 owns 100% of the stock of Sanlando Utilities Corporation (*Sanlando*).
7 Presently, I serve as Assistant Operations Manager and am responsible for
8 overseeing all day-to-day operations for all water and wastewater systems
9 owned by any subsidiary of Utilities, Inc. in Seminole and Orange
10 Counties, Florida.

11 Q. Please summarize your background and experience in the industry
12 of providing water and sewer service to the public.

13 A. I began employment with Sanlando in 1980 as an Operator
14 Trainee, and in 1985, I was promoted to Lead Operator. In 1995, I was
15 promoted to Chief Operator, responsible for the day-to-day operations of
16 all facilities owned by Greater Construction Company, which included
17 Sanlando, Lake Groves Utilities, Inc. and Lake Hills Utilities, Inc. In 1999,
18 Utilities, Inc. acquired the stock of Sanlando. Utilities, Inc. of Florida, a
19 wholly-owned subsidiary of Utilities, Inc., which is the operating company
20 for all Florida operations, hired me as Area Manager. I was responsible for
21 all day-to-day operations of all Seminole County facilities. In 2000, I was

1 promoted to Assistant Operations Manager, a position I currently hold.

2 In 1982, I received certifications from the Florida Department of
3 Environmental Protection in both water and wastewater plant operations.
4 In 1984, I received advanced certifications in water and wastewater to
5 Class "B" level. In 1987, I received Class "A" wastewater certification, and
6 in 1989, I received Class "A" water certification. Later, I received
7 certifications in both water distribution and wastewater collection systems
8 operations. I currently hold Class "A" certifications in both water and
9 wastewater operations. In addition, I have taken many courses, seminars
10 and workshops relating to water and wastewater operations. A copy of
11 my resume is attached to my testimony. (SLH-1)

12 **Q. What is the purpose of your testimony in this proceeding?**

13 **A.** I will respond to the testimony of the witnesses for the City, Mr.
14 Richard Kornbluh and Mr. Thomas Jensen, with respect to the technical
15 and engineering effects of disconnecting the customers in the Sleepy
16 Hollow, Windsor Manor, Devonshire and Moorings subdivisions (*Disputed*
17 *Areas*), and in particular:

- 18 1. The manner in which service is provided to Sanlando's customers.
- 19 2. Sanlando's current levels and types of service to its customers.
- 20 3. The areas within Sanlando's service area which will be affected by
21 the transfer of the customers in the Disputed Areas to the City.
- 22 4. Sanlando's current levels and types of service in the areas which

1 will be affected by the transfer of the customers in the Disputed
2 Areas to the City.

3 5. The systems and facilities which will be affected by the transfer of
4 the customers in the Disputed Areas to the City.

5 6. The manner in which service to such customers will be affected.

6 7. How the transfer of the customers in the Disputed Areas will affect
7 Sanlando's ability to provide service to its remaining customers.

8 Q. How does Sanlando currently provide water and wastewater
9 service to its customers?

10 A. Sanlando owns and operates three (3) water treatment plants and
11 two wastewater treatment plants. Sanlando has been providing
12 continuous and satisfactory service to the customers in its water and
13 wastewater service areas, including the areas which are the subject of the
14 current application, for over 30 years. Its service areas are essentially built
15 out and therefore consumption is relatively stable. For over 30 years,
16 Sanlando has satisfactorily complied with all rules and regulations
17 affecting water and wastewater operations. In addition, Sanlando
18 frequently and routinely invests in upgrading its facilities so that
19 customers can be assured that they will receive reliable water and
20 wastewater service that complies with all governmental requirements.

21 Q. What are Sanlando's current levels and types of service to
22 customers?

1 A. Sanlando currently serves over 10,000 water customers. Of these,
2 over 9,500 are residential customers, and approximately 500 are general
3 service customers. Sanlando also serves 8,200 wastewater customers.

4 Q. What areas within Sanlando's service area will be affected by the
5 transfer of the customers in the Disputed Areas to the City?

6 A. The portions of Sanlando's current service areas which will be
7 affected by the proposed transfer of the customers in the Disputed Areas
8 are marked on the maps attached to the testimony of Mr. Patrick C. Flynn.
9 (PCF-8 and PCF-9).

10 Q. What are Sanlando's current levels and types of service in the
11 areas which will be affected by the transfer of the customers in the
12 Disputed Areas?

13 A. There are 475 residential water customers and approximately 450
14 residential wastewater customers in the Disputed Areas. As you can see,
15 there are a significant number of customers that will be affected as a result
16 of the transfer.

17 Q. What systems and facilities will be affected by the transfer of the
18 customers in the Disputed Areas to the City?

19 A. Water service to the Disputed Areas is provided primarily through
20 the Des Pinar water treatment plant (*WTP*). The water distribution lines
21 serving the Disputed Areas are also integrated into Sanlando's distribution
22 system as a whole. For instance, the Knollwood WTP and the Wekiva

1 WTP are interconnected to the Des Pinar distribution system and provide
2 operational redundancy.

3 Wastewater service to the Disputed Areas is provided solely through
4 the Des Pinar wastewater treatment plant (*WWTP*). The wastewater
5 collection system associated with this plant is designed to serve only that
6 portion of Sanlando's service area located east of Markham Woods Road.
7 The treatment plants and facilities in the Disputed Areas are marked on
8 the maps attached to Mr. Flynn's testimony. (PCF-5, PCF-6, PCF-8 and
9 PCF-9)

10 There are approximately 2,300 customers to whom Sanlando
11 provides service through its Des Pinar WTP, the Des Pinar *WWTP*, and
12 their associated facilities. This includes the approximately 475 customers
13 in the Disputed Areas. The disconnection of customers in the Disputed
14 Areas will have a profound and prolonged impact on the remaining
15 customers served by the Des Pinar WTP and Des Pinar *WWTP* and
16 associated systems.

17 **Q. Please explain why and how these customers will be affected?**

18 **A.** As shown on the maps attached to Mr. Flynn's testimony (PCF-5,
19 PCF-6, PCF-8 and PCF-9), these customers are served by the same water
20 distribution and wastewater collection systems. These systems comprise
21 an integrated arrangement of lines and facilities which are necessary to
22 provide service to Sanlando's entire service area. Transferring the

1 customers in the Disputed Areas is not just a simple matter of transferring
2 accounts. The Disputed Areas are not contiguous with each other and
3 therefore the disconnection of the customers in the Disputed Areas from
4 Sanlando's facilities will require the construction and installation of
5 parallel facilities in order for Sanlando to maintain the provision of service
6 to its remaining customers. Disconnection will cause a disruption of
7 service to all 2,300 customers who are connected to the systems.
8 Additionally, new lines must be constructed to reestablish service,
9 including fire protection, to the remaining customers who are not
10 transferred.

11 **Q. How will the transfer of the customers in the Disputed Areas**
12 **affect Sanlando's ability to provide service to its remaining customers?**

13 **A. Customers will experience disruptions in water and wastewater**
14 **service during construction. In addition, the costs associated with having**
15 **to install new facilities would be passed on to Sanlando's customers. If the**
16 **Commission approves Sanlando's application, no new or additional**
17 **facilities are needed to provide service to the affected area. No one will**
18 **incur additional costs as a function of this application.**

19 **Q. Will Sanlando be able to provide continuous and uninterrupted**
20 **service to its remaining customers if the customers in the Disputed Areas**
21 **are transferred to the City?**

22 **A. No, not without major capital investments to insure adequate flow**

1 and pressure.

2 Q. Does this conclude your testimony?

3 A. Yes it does.

TESTIMONY OF
SCOTTY L. HAWS
REGARDING THE APPLICATION FOR
AMENDMENT TO CERTIFICATES 247-W AND 189-S
IN SEMINOLE COUNTY, FLORIDA

LIST OF EXHIBITS

SLH-1 Resume of Scotty L. Haws

Pages 1-8

Scotty L. Haws
78 Lake Drive
DeBary, FL 32713

RE: **Resume**

Experience

Sanlando Utilities Corporation & Utilities, Inc. of Florida

September 1980 to February 1982

Water & Wastewater Plant Operator Trainee

Assisted plant operators in operation and maintenance of the Wekiva water and wastewater treatment facilities

February 1982 to April 1985

Water & Wastewater Plant Operator

Performed day to day operation and maintenance duties – Wekiva water and wastewater facilities

April 1985 to January 1995

Lead Water & Wastewater Plant Operator

Responsible for the day to day operation and maintenance of the Wekiva water and wastewater facilities

January 1995 to January 1999

Chief Water & Wastewater Plant Operator

Responsible for day to day operations of all Sanlando, Lake Groves, and Lake Hills Utilities, owned by Greater Construction Company

January 1999 to August 2000 – Utilities, Inc. of Florida

Area Manager – Seminole County, FL.

Responsible for day to day operations of all plant facilities in Seminole County

August 2000 to Present

Assistant Operations Manager

Responsible for day to day operations of all water and wastewater systems in Seminole and Orange County

Resume
Scotty L. Haws
Page Two

Education

January 1981 to April 1981
Seminole Community College – “C” Wastewater Plant Operations Course

April 1981 to August 1981
Seminole Community College – “C” Water Plant Operations Course

January 1984 to April 1984
Seminole Community College – “B” Wastewater Plant Operations Course

April 1984 to August 1984
Seminole Community College – “B” Water Plant Operations Course

January 1986 to April 1986
California State University, Sacramento - “A” Wastewater Plant Operations Course

January 1987 to April 1987
Michigan State University – Management Course (for “A” Water Certification)

Numerous short course/seminars for water and wastewater process control, electrical system troubleshooting, rules and regulations

October 2003 to November 2003
“C” Wastewater collection technician Course

October 2005 to November 2005
“C” Water distribution technician Course

References

Robert Mandell , President, - Greater Construction Company (407) 869-0300
Hampton Conley, Exec. Vice President, - Greater Construction Company (407) 869-0300
Patrick C. Flynn, Regional Director, - Utilities, Inc. of Florida

State of Florida
Department of Environmental Regulation



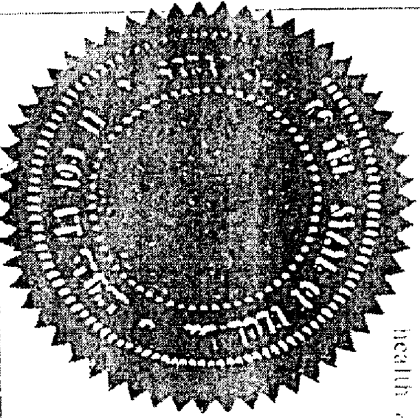
Be it known that

SCOTT W. THOMAS

having demonstrated competency in successfully meeting the requirements of Chapter 403, Florida Statutes and Chapter 17-16, Florida Administrative Code, is hereby licensed a

Class A Certified Drinking Water Treatment Plant Operator

with all the privileges and responsibilities appurtenant to this profession.
In recognition of the above achievements and as provided by law, the Department of Environmental Regulation hereby issues this certificate numbered 004534 on the 4th day of May A.D., 1989, which bestows the responsibilities to protect the health and environment of the citizens of the State of Florida.



Certification Officer
Certification and Manpower Development Section

Alan W. ...
Secretary of the Department

State of Florida
Department of Environmental Regulation

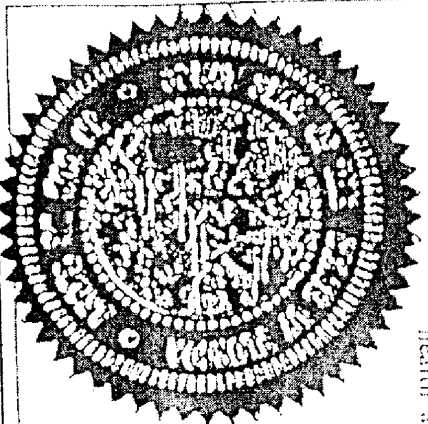


BE IT KNOWN THAT
SUQOQYU 正, 新入册

having demonstrated competency in successfully meeting the requirements of Chapter 403, Florida Statutes and Chapter 17-16, Florida Administrative Code, is hereby licensed a

Class A Certified Wastewater Treatment Plant Operator

with all the privileges and responsibilities appurtenant to this profession.
In recognition of the above achievements and as provided by law, the Department of Environmental Regulation hereby issues this certificate, numbered 005312, on the 5th day of February, A.D., 1987, which bestows the responsibilities to protect the health and environment of the citizens of the State of Florida.



[Signature]
Certification Officer
Certification and Manpower Development Section
[Signature]
Secretary of the Department

GOVERNOR

DISPLAY IS REQUIRED BY LAW

SECRETARY

JEB BUSH

COLLEEN M. CASTILLE

SCOTTY L HAWS

VALID UNTIL: 4/30/2007

THE CLASS A DRINKING WATER TREATMENT PLANT OPERATOR NAMED BELOW IS LICENSED UNDER THE PROVISIONS OF CHAPTER 403, FLORIDA STATUTES.

ISSUED:

2/15/2005

LICENSE NO: 0004534

State of Florida
Department of Environmental Protection

State of Florida
Department of Environmental Protection

ISSUED: 2/15/2005 LICENSE NO: 0005312

THE CLASS A WASTEWATER TREATMENT PLANT OPERATOR NAMED BELOW IS LICENSED UNDER THE PROVISIONS OF CHAPTER 403, FLORIDA STATUTES.

VALID UNTIL: 4/30/2007

SCOTTY L HAWS

JEB BUSH GOVERNOR
COLLEEN M. CASTILLE SECRETARY

DISPLAY IS REQUIRED BY LAW

Florida Water & Pollution Control Operators Association

Voluntary Certification Program

hereby certifies that

Scotty L. Hauss

has met the requirements for certification

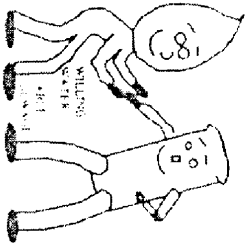
as


Water Distribution Technician


Certificate Number 4465

Date issued November 17, 2005

FW & PCOA




President, FW&PCOA


Chairman, Voluntary Certification Board

Florida Water & Pollution Control Operators Association

Voluntary Certification Program

hereby certifies that

Satty L. Hauss

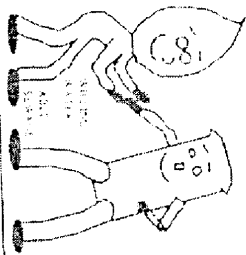
has met the requirements for certification

as

Wastewater Collection Technician

Certificate Number 4265

Date issued November 16, 2003



FW & PCOA

Walter S. Jones

President, FWPCOA

Walter S. Jones

Chairman, Voluntary Certification Board