

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Betmar Utilities, Inc. )  
Application for Amendment )  
of Water and Sewer )  
Certificate )

Docket No. )  
Order No. )  
Issued )

79/280-WS

ORIGINAL  
FILE COPY

RESTATED OBJECTION TO NOTICE OF AMENDMENT TO  
WATER AND SEWER CERTIFICATE

PASCO COUNTY, a political subdivision of the State of Florida, acting by and through its undersigned attorney, hereby objects to the Notice of Amendment of Water and Sewer Certificate filed on behalf of Betmar Utilities, Inc., and proposing to provide service to an unincorporated area of Pasco County along Dean Dairy Road located in the southeast portion of the County; and, more specifically, Pasco County objects to the Notice of Amendment of Water and Sewer Certificate filed by Betmar Utilities, Inc. for service to those areas set forth in its Notice for the below stated reasons:

1. Pasco County is presently completing construction of a .8 million gallon per day wastewater treatment plant located in the southeast portion of the County which has been constructed and designed for an ultimate expansion to 9 million gallons per day of treatment capabilities.

2. The first phase of this subregional wastewater treatment will be fully operational as of January 1, 1990 with an uncommitted treatment capacity as of that date of .578 million gallons per day.

3. Pasco County currently has wastewater collection lines and force mains located along Dean Dairy Road which are adjacent to the area described in the Notice of Betmar Utilities, Inc. and which are capable of providing state-of-the-art wastewater treatment services from the aforementioned subregional facility.

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG / \_\_\_\_\_  
LIN / \_\_\_\_\_  
OPC / \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC / \_\_\_\_\_  
WAS / \_\_\_\_\_  
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

12287 DEC 26 1989

FPSC-RECORDS/REPORTING

4. Pasco County currently possesses sufficient potable water production facilities and transmission facilities in order to provide an adequate, cost-effective source of potable water to the area sought to be served by Betmar Utilities, Inc.

5. The extension of service as proposed by Betmar Utilities, Inc. will result in an unnecessary and uneconomic duplication of water and wastewater services in light of the existing facilities and service capabilities of Pasco County.

6. The proposed extension by Betmar Utilities, Inc., will violate the provisions of Pasco County's Local Government Comprehensive Plan as said plan relates to the provision of both potable water and wastewater treatment services.

7. Pasco County has expended in excess of \$5 million dollars in the southeast subregional service area in order to meet the long-term needs for environmentally sound and cost-effective wastewater treatment services and potable water production supply services thereby eliminating the need for any future expansion of privately owned and operated interim treatment facilities and water supply facilities.

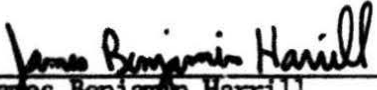
8. The wastewater treatment plant currently operated by Betmar Utilities, Inc., and proposed for expansion, has been under enforcement action by the Florida Department of Environmental Regulation for approximately the last four (4) years while Pasco County continues to provide a state-of-the-art utility system capable of meeting both the present and future needs of its citizens.

9. Any authorization for the extension of services by Betmar Utilities, Inc. for the expansion of the existing wastewater treatment plant would be inconsistent with Section 163.1394, Florida Statutes.

WHEREFORE, Pasco County would respectfully request that the Public Service Commission:

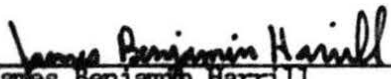
1. Initiate a formal hearing in accordance with Section 367.051(2), (3), Florida Statutes, Section 367.061(3)(b), Florida Statutes and Section 120.57, Florida Statutes.
2. Deny the request of Betmar Utilities, Inc. for an extension of its water and/or sewer certificate.
3. Grant such other relief as the Public Service Commission may deem appropriate.

Respectfully Submitted,

  
James Benjamin Harrill  
Pasco County Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original and fifteen (15) copies of the foregoing has been furnished by regular U.S. Mail to the Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32304 and a true and correct copy of the foregoing has been furnished by regular U.S. Mail to Betmar Utilities, Inc., Post Office Box 370, Port Richey, Florida 34673-0370, this 21<sup>st</sup> of December, 1989.

  
James Benjamin Harrill  
County Attorney  
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813-847-8120  
Bar No. 275557