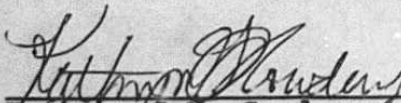


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct of the Testimony of Kim Robert Kreiger has been furnished by hand delivery to Ms. Catherine Bedell, Division of Legal Services, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, FL 32399-0850, and by U.S. mail to Mr. Robert D. Pritt, City of Sanibel, 800 Dunlop Road, Sanibel, Florida 33957, DATED this 22nd day of April, 1991.

Respectfully submitted,



Kathryn G.W. Cowdery
Gatlin, Woods, Carlson & Cowdery
1709-D Mahan Drive
Tallahassee, FL 32308
(904) 877-7191

Attorneys for
Sanibel Sewer System
Partners, Ltd.

DOCUMENT NUMBER-DATE

03868 APR 22 1991

PPSC-RECORDS/REPORTING

1 SANIBEL SEWER SYSTEM
2 TESTIMONY OF KIM ROBERT KREIGER
3 DOCKET NUMBERS 900802-SU AND 910476-SU
4
5

6 Q. Please state your name.

7 A. My name is Kim Robert Kreiger.
8

9 Q. Did you file direct testimony in Docket No. 900802-SU?

10 A. Yes I did.
11

12 Q. What is the purpose of this, your Supplemental Direct
13 Testimony?

14 A. The purpose of my testimony is to address certain
15 revised maps and legal descriptions filed in Docket
16 No. 900802-SU, and to address the subject matter of
17 the Application of Sanibel Sewer System Partners, Ltd.
18 - Amendment to Certificate No. 187-S, originally
19 assigned Docket No. 910476-SU.
20

21 Q. On March 29, 1991, in Docket 900802-SU Sanibel Sewer
22 System filed amended legal descriptions and maps of
23 the proposed certificated service area. Could you
24 provide a general description of these areas?

25 A. The March 29, 1991 filing addressed two geographic

1 areas. The first is on West Gulf Drive and the second
2 on Periwinkle Way. Both of these areas are in Sanibel
3 Sewer System's certificated area. In its original
4 filing, Sanibel requested that these areas be deleted
5 from its certificated territory. Facts have been
6 brought to Sanibel Sewer System's attention which
7 cause it to conclude that these two geographic areas
8 should not be deleted from Sanibel Sewer System's
9 certificated territory.

10

11 Q. Please describe the first geographic area referenced
12 above.

13 A. The first geographic area is located on West Gulf
14 Drive in S34-T46-R22 and S27-T46-R22. It was
15 discovered that two customers are located here.
16 "Lantana on the Gulf" had paid a connection fee but
17 has not connected to the system. The original Service
18 Availability Letter was issued under a different
19 condominium name, and was therefore overlooked when
20 the certificated territory was being analyzed.

21 The second customer in this area, Beachview
22 Cottages, is located adjacent to the Lantana on the
23 Gulf project. The original request for service from
24 the Beachview Cottages contained an error in the site
25 address. The incorrect site address identified the

1 parcel as being within the current certificated area
2 and not in an area proposed for deletion. However,
3 upon further identification by the Utility, the actual
4 parcel would fall within the area proposed for
5 deletion. The Utility believes that the error was an
6 honest mistake on behalf of Beachview Cottages and
7 therefore is now requesting that this area not be
8 deleted from the certificated territory.
9

10 Q. Please address the second geographic area referenced
11 above.

12 A. The second parcel which was originally requested for
13 deletion is located in S19-T46-R23. A current
14 customer on an adjacent parcel has paid connection
15 fees for 10 ERC's to be constructed on the parcel
16 requested for deletion. Because of the circumstances,
17 the Utility is therefore not asking for this area to
18 be deleted from its certificated territory.

19
20 Q. Docket 910476-SU, Application for amendment of
21 Certificate No. 187-S in Lee County by Sanibel Sewer
22 System Partners, Ltd., was opened on April 3, 1991,
23 for the purpose of adding a parcel to the certificated
24 territory. Could you describe why the Utility took
25 this action?

1 A. In reviewing the application filed in Docket
2 900802-SU, Commission Staff discovered that an area
3 located in S26, T46 S, R22 E, which the Utility was
4 requesting to add to its certificated territory, had
5 not been noticed for extension as part of the
6 Application. This small area contains one customer,
7 U.S. Fish and Wildlife, which has been receiving
8 service since 1985. This addition will have no impact
9 on the Utility or current customers, since the area is
10 so small and contains one current customer. The
11 Utility has always treated this area for regulatory
12 purposes as if it were in the certificated territory,
13 believing that to be the case.

14

15 Q. Does the request to include the parcel described in
16 S26, T46 S, R22 E in the Utility's certificated area
17 meet the criteria for determining the appropriate
18 certificated territory as described in your Direct
19 Testimony?

20 A. Yes it does.

21

22 Q. Do you have anything further to add?

23 A. Not at this time.

24

25