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PREFILED TESTIMONY OF STANLEY D. RIEGER, PSC BUREAU OF SPECIAL ASSISTANCE

DIVISION OF WATER AND WASTEWATER

FILED ON BEHALF OF

THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION

SHADY OAKS MOBILE-MODULAR ESTATES, INC.

DOCKET NO. 900025-WS

FILED: OCTOBER 12, 1992

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1 DIRECT TESTIMONY OF STANLEY D. RIEGER

2 Q. Would you please state your name and business address?

3 A. Stanley D. Rieger, 101 East Gaines Street, Fletcher Building, Tallahassee,  
4 Florida 32399-0873

5 Q. By whom are you employed?

6 A. I am employed by the Florida Public Service Commission.

7 Q. In what capacity?

8 A. I am employed as an Engineer in the Division of Water and Wastewater.

9 Q. How long have you been employed in that capacity?

10 A. I have been employed in this capacity since April, 1981.

11 Q. Briefly describe your duties?

12 A. My general responsibilities normally include, but are not limited to the  
13 following:

14 (a) Participation in formal and informal rate proceedings involving  
15 water and sewer utilities under the jurisdiction of the Public Service  
16 Commission;

17 (b) Review and evaluation of rate applications; preparation and  
18 analysis for special projects; preparation of testimony, giving  
19 testimony and preparation of cross-examination questions for rate cases  
20 in which I am involved;

21 (c) Performance of detailed inspection of utility plants;

22 (d) Inspection of utility condition and appearances of plant;

23 (e) Review of capacity of treatment plants;

24 (f) Review of operational data relating to test years;

25 (g) Review of treatment costs;

- 1 (h) Review of operating personnel and their duties and salaries;
- 2 (i) Inspection of water meters and meter programs;
- 3 (j) Determination of what equipment is on hand to service systems;
- 4 (k) Review of booked plant value;
- 5 (l) Analysis of utilization of plant items;
- 6 (m) Review of upgrading requirements
- 7 (n) Review of operating and construction permits;
- 8 (o) Check for citations currently outstanding;
- 9 (p) Obtain permit and approval numbers from regulatory agencies.
- 10 (q) Preparation of original cost studies on utility plant.

11 Q. Please describe your educational qualifications and experience?

12 A. I received a Bachelor of Arts Degree from Washburn University of Topeka,  
13 Kansas, in 1974, with a major in Mass Communications. From 1974 to 1981, I  
14 was employed by the City of Tallahassee, Florida, as a wastewater treatment  
15 plant operator. I am currently certificated by the Florida Department of  
16 Environmental Regulation as a Class "A" Wastewater Treatment Plant Operator  
17 and as a Class "C" Water Treatment Plant Operator. Also, I am certified by  
18 the Florida Water and Pollution Control Operators Association as a Class "C"  
19 Wastewater Collection Technician and a Class "C" Water Distribution  
20 Technician.

21 Q. Have you participated in rate cases in your capacity as an Engineer with  
22 the Public Service Commission?

23 A. Yes I have.

24 Q. As part of your duties as an Engineer, are you occasionally assigned  
25 duties in relation to rate cases?

1 A. Yes I am.

2 Q. Were you given such duties in relation to the Shady Oaks staff assisted  
3 rate case Docket No. 900025-WS?

4 A. Yes I was.

5 Q. What is the present status of the Commission- ordered installation of  
6 meters at the Shady Oaks Subdivision?

7 A. Meters to all of the utility's customers have been installed.

8 Q. When were they installed?

9 A. On June 5, 1992, the Commission received a letter from the utility stating  
10 that meters were installed for all of its residential customers. On June 17,  
11 1992, I conducted an on-site inspection and verified that the residential  
12 customers were metered and that the utility was nearing completion of the  
13 installation of meters for its general service customers.

14 Q. Has the Commission formally recognized the installation of the meters?

15 A. Yes. As shown in Exhibit FJL-2, by Order No. 24084 issued February 8,  
16 1991, the Commission recognized the installation of the meters and approved  
17 the implementation of base facility and gallonage charges.

18 Q. You stated that when you conducted the on-site inspection on June 17,  
19 1992, the utility was completing the installation of meters for its general  
20 service customers. Would you say that June 17, 1992, was the day of  
21 completion of that project?

22 A. June 17, 1992 was the day of completion of the meter installation project.

23 Q. Did the utility comply with the Commission orders to install water meters  
24 in a timely fashion?

25 A. No. The utility installed the meters in a timely manner in accordance

1 with Commission Order No. 24084. PAA Order No. 24084 required the utility to  
2 install water meters for all its customers within six months. As shown in  
3 Exhibit FJL-3, Order No. 25296, issued on November 4, 1991, found that the  
4 utility had failed to comply with Order No. 24084. One part of the utility's  
5 noncompliance was its failure to complete the installation of meters. Citing  
6 problems with customers not paying their bills because of a court dispute over  
7 the utility's rates, the utility was allowed in Order No. 25296 an additional  
8 five months to install the meters. Noting that the utility was not in  
9 complete compliance with the order to install the meters, Order No. PSC-92-  
10 0367-FOF-WS, issued on May 14, 1992, show caused the utility as to why it  
11 should not be fined for noncompliance with the previous orders. This order  
12 is attached to Ms. Lingo's testimony as Exhibit FJL-4. Finally, on June 17,  
13 1992, 74 days past the deadline stated in Order No. 25296, the last meters  
14 were installed. Thus, I believe that the utility was in violation of a  
15 Commission order for 74 days.

16 Q. Order No. PSC-92-0367-FOF-WS ordered the utility to show cause why it  
17 should not be fined for continuing to provide unsatisfactory quality of  
18 service. Has the quality of service provided by the utility improved since  
19 that order was issued?

20 A. No. Because of the utility's failure to interconnect its wastewater  
21 system with Pasco County, quality of service should still be considered  
22 unsatisfactory. Also, staff has seen no indication that customer relations  
23 have improved. Staff has received several customer complaints concerning  
24 problems with the installation of the meters, limited office hours of the  
25 utility, and water outages.

1 | Q. Does this complete your testimony?

2 | A. Yes.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for staff-)  
assisted rate case in Pasco )  
County by SHADY OAKS MOBILE- )  
MODULAR ESTATES, INC. )  
\_\_\_\_\_ )

DOCKET NO. 900025-WS  
FILED: 10-12-92

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Prefiled Direct Testimony of Francis J. Lingo, along with Exhibits FJL-1 through FJL-8, and Stanley D. Rieger, filed in this proceeding on behalf of the Staff of the Florida Public Service Commission on this date, has been furnished by U.S. Mail to Mr. R.D. Sims, P.O. Box 280012, Zephyrhills, Florida, 33682-0012, this 12<sup>th</sup> day of October, 1992.



Matthew J. Feil, Staff Attorney

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