

GATLIN, WOODS, CARLSON & COWDERY  
Attorneys at Law  
a partnership including professional associations

The Mahan Station  
1709-D Mahan Drive  
Tallahassee, Florida 32308

B. KENNETH GATLIN, P.A.  
THOMAS F. WOODS  
JOHN D. CARLSON  
KATHRYN G.W. COWDERY  
WAYNE L. SCHIEFELBEIN

TELEPHONE (904) 877-7191  
TELECOPIER (904) 877-9031

ORIGINAL  
FILE COPY

March 3, 1993

Hand-Deliver

Mr. Steve Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0850

RE: Docket No. 911082-WS  
Proposed Revision of PSC Water and Wastewater Rules

Dear Mr. Tribble:

Enclosed is an original and fifteen (15) copies of the  
Comments of Florida Cities Water Company in Opposition to Proposal  
by Florida Fire Sprinkler Association.

Please acknowledge receipt of the foregoing by stamping the  
enclosed extra copy of this letter and returning same to my  
attention. Thank you for your assistance.

Very truly yours,

ACK ✓  
AFA \_\_\_\_\_  
APP L  
CAF \_\_\_\_\_  
CMM \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 1  
LIN 6  
OPC \_\_\_\_\_  
RCH 2  
SEC 1

*B. Kenneth Gatlin*  
B. Kenneth Gatlin

BKG/meg  
Enclosures  
cc: (w/enc.)  
Buddy Dewar  
Jack Shreve  
Kenneth Hoffman  
Matthew J. Feil  
Chuck Hill

RECEIVED & FILED

FPSC BUREAU OF RECORDS

WAS  
OTH *misdan*

DOCUMENT NUMBER-DATE  
02375 MAR-3 93  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Revision of )  
PSC Water and Wastewater Rules)

Filed: March 3, 1993  
Docket No. 911082-WS

ORIGINAL  
FILE COPY

COMMENTS OF FLORIDA CITIES WATER COMPANY IN  
OPPOSITION TO PROPOSAL BY FLORIDA FIRE SPRINKLER ASSOCIATION

Florida Cities Water Company (FCWC), by and through its counsel, files the following comments in opposition to the proposals by the Florida Fire Sprinkler Association regarding fire sprinkler system stand-by fees and cross connection control.

1. In the section of its proposal entitled "The Issue," the Association contends that property owners of sprinkled buildings are paying for the water supply burden created by non-sprinkled buildings because the quantity and pressure demand for water within a community is based on the needed fire flow for non-sprinkled buildings. The fact is that most communities have minimum fire flow requirements regardless of whether or not a building is sprinkled. In addition, the only people benefiting from the sprinkled building are those occupying the building. Why should the general body of ratepayers be required to subsidize (via increased plant capacity, and thus rates, to provide adequate pressure and flow for the sprinkler systems) the few benefiting from the sprinkler system? The property owners of sprinkled buildings are also receiving benefits from reduced insurance rates that the general body of ratepayers are not receiving.

2. In the section of its proposal entitled "Less Demand on Water Distribution Systems," the Association states that each fire sprinkler typically flows 24 gallons per minute (gpm) at 20 pounds

DOCUMENT NUMBER-DATE

02375 MAR-3 88

FPSC-RECORDS/REPORTING

per square inch (psi). The Association also states that a fire official may require a fire pump or provisions for an alternative water source. If 24 gpm at 20 psi are good numbers, it does not eliminate the fact that each sprinkler system has many (hundreds in the case of a large building) fire sprinklers. If the Association's contention that only small flow rates are required, why is it that the vast majority of sprinkler system services are four inches and larger in diameter? A fire pump can typically put a very high demand on a water distribution system. In addition, the alternative water source is of great concern to a water purveyor. The fire department may fill their pumper truck with water from any source (canal, pool, drainage ditch, salt or brackish water bodies, lakes, etc.) and then pump this into the sprinkler system. This is a potential cross connection of monumental proportions requiring the maximum protection for the public water supply.

3. In the section of its proposal entitled "Fire Sprinklers Verses Fire Hydrants," the Association states that water supply demand at a fire hydrant is based upon the fire hazards in proximity to and designated to be protected by that hydrant. While this is true many communities also require minimum hydrant spacing regardless of what will be in the proximity of the hydrant. Many communities also have minimum sizing requirements for water mains based solely on the type of zoning, not on the potential fire hazard. Thus, the contention that a fire sprinkler system would reduce the size of the water distribution system is untrue.

4. In the section of its proposal entitled "The Cost of Fire Department Suppression Activities," the Association uses the recent City of Jacksonville petroleum storage tank fire to promote the water savings of a sprinkler system. It is unclear how a sprinkler system would have prevented the massive use of water in this particular fire. Also, the Association states "fires will not extend or expand beyond this fire sprinkler design area if the system is properly designed." This statement sounds like a guarantee. The Association also states that "allowing the deterrents to the installation of fire sprinkler system, such as standby water fees, is not in the best interest of firefighter safety." The fact is that a monthly fee for the service of providing the water supply to sprinkler systems does not provide a deterrent to installation of the system; the very high capital investment often is THE deterrent.

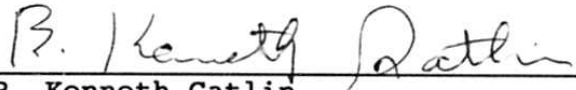
5. In the section of its proposal entitled "A Call For Eliminating Standby Water Charges," the Association contends that tax and other incentives offered have been retorted by standby water fees. Again, the monthly charge for the service does not discourage the installation of such systems, the high capital investment does discourage their installation. In addition, property owners do not voluntarily install fire sprinkler systems, they must be mandated to do so by local ordinance, type of building construction or insufficient fire flow as determined by local ordinance. Therefore, the standby water fees are not the problem;

the problems are lack of local ordinances and the high capital investment required for these systems.

6. In the section of its proposal entitled "Cross Connection Obsession," the Association states that the potential for cross connection from properly maintained fire sprinkler systems is minute. Therefore, the Association contends that any cross connection control beyond the recommendations of the AWWA's Pamphlet M-14 should not be allowed. The fact is that even the most well-maintained sprinkler system, if an alternate water source connection is present, is an enormous cross connection waiting to happen. The public health can not be compromised on this issue. Chapter 17-555 of the Florida Administrative Code requires the water purveyor to have a cross connection control program based on AWWA's Pamphlet M-14. AWWA's Pamphlet M-14 establishes minimum recommended standards for cross connection control. It is incumbent on the water purveyor to protect the water distribution system from contamination via cross connections. Therefore, the water purveyor should be the one who establishes the cross connection control policy for its system.

7. To summarize FCWC's position on the foregoing, standby water fees should remain in place, and the details of cross connection control programs should stay within the authority of the water purveyor and not be hamstrung by a minimum recommended standard.

Respectfully submitted,



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

Counsel for FLORIDA CITIES WATER  
COMPANY