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FAMILY DINER, INC. AND TURKEY CREEK, INC. D/B/A TURKEY CREEK UTILITIES

DOCKET NO: [REDACTED]

DIRECT TESTIMONY OF JOANN CHASE, BUREAU OF CERTIFICATION
ON BEHALF OF THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF WATER AND WASTEWATER

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FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF JOANN CHASE

1
2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. JoAnn Chase, 101 East Gaines Street, Tallahassee, Florida, 32399.

4 Q. BY WHOM ARE YOU EMPLOYED?

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

6 Q. WHAT ARE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUNDS?

7 A. I received a Bachelor of Science degree in Business Management from
8 Florida State University. I have been employed with the Public Service
9 Commission for approximately 18 years. During this time, I have worked
10 in the Division of Electric and Gas in the area of rates and cost of
11 service, the Division of Research in the area of management studies, and
12 in the Division of Water and Wastewater in the areas of rates and
13 certification. I have been a supervisor in the Bureau of Certification
14 since 1989.

15 Q. WHAT IS YOUR INVOLVEMENT IN DOCKET NO. 921098-WS REGARDING THE
16 APPLICATION OF TURKEY CREEK UTILITIES FOR A GRANDFATHER CERTIFICATE?

17 A. I supervise the staff members which have been assigned to this case.

18 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS DOCKET?

19 A. The purpose of my testimony is to present justification for the staff's
20 positions on the territory that should be granted to Turkey Creek
21 Utilities under grandfather rights as well as the appropriate rates and
22 charges that should be approved for this utility.

23 Q. PLEASE EXPLAIN HOW AND WHEN TURKEY CREEK UTILITIES BECAME SUBJECT TO THE
24 JURISDICTION OF THE PUBLIC SERVICE COMMISSION.

25 A. The Alachua County Commission passed an ordinance effective June 30,

1 1992 transferring jurisdiction of privately owned water and wastewater
2 utilities in Alachua County to the Public Service Commission (Commission
3 or PSC), pursuant to Section 367.171, Florida Statutes. According to
4 that statute, any utility engaged in the operation or construction of
5 a system shall be entitled to receive a certificate for the area served
6 by such utility on the date this chapter becomes applicable to it.
7 Turkey Creek Utilities was operating water and wastewater utilities in
8 Alachua County on June 30, 1992, and, therefore, is entitled to receive
9 certificates from the PSC for the area served by it on that date.

10 **Q. HAVE CERTIFICATES BEEN ISSUED TO TURKEY CREEK UTILITIES?**

11 **A.** No. In its application for grandfather certificate, the utility
12 requested more territory than it was serving on June 30, 1992. By
13 proposed agency action Order No. PSC-93-0229-FOF-WS, dated February 10,
14 1993, the Commission granted Certificate Nos. 550-W and 480-S to Turkey
15 Creek Utilities only for the territory served by the utility on June 30,
16 1992. Since that order was protested by the utility, no certificates
17 have yet been issued. The territory that should be approved for this
18 utility under grandfather rights is an issue in this proceeding.

19 **Q. HOW DOES THE COMMISSION DETERMINE THE SERVICE TERRITORY THAT SHOULD BE**
20 **GRANTED IN GRANDFATHER CERTIFICATE CASES?**

21 **A.** If the county that turns over jurisdiction to the Commission has in
22 place a process where territory served by utilities is identified and
23 approved, the Commission would grant a grandfather certificate to each
24 utility for the territory approved by the county. However, in most
25 cases when a county turns over jurisdiction to the Commission, we find

1 that the county has not actively regulated the private utilities.
2 Frequently, this means that the county did not specifically define the
3 service territory that utilities were authorized to serve. In such
4 cases, the Commission attempts to make a reasonable determination of the
5 proper service area to be granted in a grandfather proceeding. This may
6 be limited to the area the utility is actually serving or a greater
7 area.

8 An example of when the Commission would grant more territory than that
9 being served is the case where a utility provides service to a
10 subdivision that is not built out. Rather than granting only the area
11 where there are customers or lines, the Commission may include the
12 entire subdivision in the utility's service territory. This would be
13 reasonable if the utility has treatment plant and lines sized to serve
14 the subdivision or executed developer agreements or service requests for
15 territory not already served, as long as the utility has been providing
16 service that meets standards set by the Department of Environmental
17 Protection.

18 **Q. WHAT SERVICE TERRITORY WAS GRANTED IN PAA ORDER NO. PSC-93-0229-FOF-WS?**

19 **A.** The territory granted by the PAA order consisted solely of the
20 portion of the Turkey Creek subdivision which the utility is currently
21 serving.

22 **Q. HAVE YOU RECEIVED ANY INFORMATION SINCE THAT ORDER WAS ISSUED THAT**
23 **CHANGES YOUR OPINION AS TO WHAT SERVICE TERRITORY SHOULD BE GRANTED IN**
24 **THIS CASE?**

25 **A.** Yes. Since that order was issued, the utility has provided a copy of

1 | the water and wastewater portions of the approved Development of
2 | Regional Impact (DRI) for the Turkey Creek subdivision. This is
3 | attached to the testimony of Norwood Hope as Composite Exhibit A.
4 | According to the DRI, the utility was built with the intention of
5 | serving the entire Turkey Creek subdivision. The water and wastewater
6 | treatment plants were built with sufficient capacity to serve the entire
7 | subdivision, as were the transmission and collection lines. Therefore,
8 | I believe the utility should be granted territory encompassing the
9 | entire Turkey Creek development.

10 | Attached to my testimony as Exhibit No. JC-1 is a color-coded map of the
11 | requested territory. The utility requested the entire territory shown
12 | on the map. The yellow portion of the map is that granted by the
13 | Commission in the PAA order. The pink portion of the map is the
14 | additional territory I believe should be granted to the utility in this
15 | grandfather proceeding since it was a part of the approved DRI for the
16 | Turkey Creek development. Also attached to my testimony as Exhibit No.
17 | JC-2 is the territory description encompassing the yellow and pink areas
18 | outlined on the map.

19 | **Q. SHOULD TURKEY CREEK UTILITIES BE GRANTED THE REMAINDER OF THE TERRITORY**
20 | **REQUESTED IN ITS APPLICATION FOR GRANDFATHER CERTIFICATE?**

21 | **A.** In my opinion, the remainder of the requested territory, which was not
22 | a part of the DRI, should not be approved in a grandfather proceeding.
23 | The utility has no facilities in place in that area and according to
24 | information provided by the utility, there are no requests for service
25 | in that area. Granting this territory would go beyond the intent of a

1 grandfather proceeding.
2 However, at some later date, the utility can file an application to
3 amend its certificates pursuant to Section 367.045(2), Florida Statutes.
4 An amendment proceeding requires a demonstration of the financial and
5 technical ability of the applicant to provide the service as well as a
6 need for service in the requested territory. In addition, the amendment
7 process requires noticing of the application in the local newspaper as
8 well as neighboring utilities and governmental entities, and affords
9 affected parties an opportunity to object to the application. A
10 grandfather proceeding includes none of these requirements, since this
11 type of certificate is granted as a matter of right.

12 **Q. WHAT RATES FOR SERVICE ARE NORMALLY APPROVED BY THE COMMISSION IN A**
13 **GRANDFATHER PROCEEDING?**

14 **A.** In a grandfather proceeding, the Commission normally approves the rates
15 for service in effect on the date the county passed jurisdiction to the
16 PSC. If the county exercised its regulatory authority, the Commission
17 obtains the appropriate rates from the county. If the county did not
18 exercise its regulatory authority, the Commission normally determines
19 the appropriate rates by reviewing customer billing records to ascertain
20 the rates in effect on the jurisdictional date.

21 **Q. TO YOUR KNOWLEDGE, DID ALACHUA COUNTY EXERCISE ANY JURISDICTION OVER THE**
22 **UTILITY?**

23 **A.** Not to my knowledge.

24 **Q. TO YOUR KNOWLEDGE, DID THE CITY OF ALACHUA EXERCISE ANY JURISDICTION**
25 **OVER THE UTILITY?**

1 A. Yes, in fact, as explained on page 12 of the testimony of Norwood Hope,
2 President of the utility, the City of Alachua passed an ordinance
3 exerting its jurisdiction over the rates and charges of the utility.

4 Q. DO YOU AGREE WITH THE STATEMENTS ON PAGES 2 AND 12 OF MR. HOPE'S
5 TESTIMONY THAT THE CITY OF ALACHUA DID NOT HAVE ANY STATUTORY AUTHORITY
6 TO PASS AN ORDINANCE REGULATING PRIVATE UTILITIES WITHIN THE CITY?

7 A. Yes. I have been advised by the Commission's legal staff that there is
8 no Florida law giving the City that authority. Therefore, whether or
9 not the City of Alachua ever approved, or was even provided notice of,
10 any rate changes of Turkey Creek Utilities is not relevant to
11 determining rates in this grandfather proceeding.

12 Q. WHAT RATES FOR SERVICE DO YOU BELIEVE SHOULD BE APPROVED FOR THIS
13 UTILITY?

14 A. I believe the rates the utility was charging on the jurisdictional date
15 should be approved. Staff members under my supervision examined the
16 books and records of Turkey Creek Utilities and determined the rates
17 which were being charged on June 30, 1992. I have attached a schedule
18 of these rates to my testimony as Exhibit No. JC-3.

19 Q. WHAT IS THE COMMISSION PRACTICE WITH REGARD TO THE APPROVAL OF SERVICE
20 AVAILABILITY CHARGES AND OTHER MISCELLANEOUS CHARGES FOR UTILITIES IN
21 A GRANDFATHER PROCEEDING?

22 A. In a grandfather proceeding, the Commission normally approves the
23 service availability charges and other miscellaneous service charges
24 which were in effect on the date the county passed jurisdiction to the
25 PSC. However, in this case, staff believes many of the utility's

1 | charges are excessive, discriminatory or do not comport with the
2 | practices of the Commission and, therefore, should not be approved.
3 | These charges include public fire protection charges, miscellaneous
4 | service charges, late payment fee, and service availability charges.
5 | I will discuss each of these charges separately.

6 | Q. DOES TURKEY CREEK CHARGE FOR PUBLIC FIRE PROTECTION? IF SO, WHAT IS
7 | YOUR UNDERSTANDING OF WHAT THIS CHARGE INCLUDES?

8 | A. The utility charges the Turkey Creek Master Owners Association (TCMOA)
9 | \$19.98 annually per public fire hydrant for service to approximately 92
10 | hydrants. This charge is made to the TCMOA in October of each year.
11 | Mr. Hope explained in a letter to staff that this charge is a token fee
12 | for furnishing fire hydrant service, maintenance and water to each fire
13 | hydrant. A copy of this letter is attached as Exhibit No. JC-4.

14 | Q. IS THERE A WRITTEN AGREEMENT BETWEEN THE UTILITY AND THE TCMOA REGARDING
15 | A CHARGE FOR PUBLIC FIRE HYDRANTS?

16 | A. No. According to Mr. Hope, during the time he was acting as both
17 | president of the TCMOA and president of the utility, he made a verbal
18 | agreement between the two parties that the association would be
19 | responsible for the fire protection bill.

20 | Q. IS THERE ANY DOCUMENTATION OF PAYMENT BY THE TCMOA OF THE FIRE
21 | PROTECTION BILL?

22 | A. No. While, the utility provided copies of bills indicating the charge
23 | was made to the TCMOA in the past when Mr. Hope was its president, no
24 | documentation has been provided which clearly shows that the charge has
25 | ever been paid.

1 Q. WHAT IS THE COMMISSION PRACTICE OF ALLOWING REGULATED UTILITIES TO
2 RECOVER THE COSTS ASSOCIATED WITH PUBLIC FIRE PROTECTION?

3 A. It is Commission practice to include the cost of public fire protection
4 in the rates for service rather than to develop a separate charge for
5 this service. There are several reasons for this position. The
6 primary reason is that it is not reasonable to allow a utility to
7 disconnect fire protection service for nonpayment of a bill. However,
8 if the Commission approves a charge, by rule the utility is allowed to
9 discontinue service for nonpayment of that charge.

10 Another reason for not developing a separate charge is that public fire
11 protection is generally the responsibility of local government, not
12 individual customers of the utility. Therefore, if there is a separate
13 charge for fire hydrants, theoretically the utility should be billing
14 the local government which should pass the cost on to the property
15 owners in their real estate taxes. However, in most cases this is not
16 a realistic alternative.

17 Also, there is a potential equity problem if the utility bills the
18 homeowners association for public fire protection because there is no
19 assurance that all of the customers will be members of the association.
20 If not all customers are members of the association, then the non-member
21 customers are not paying their fair share of the public fire protection
22 and are being subsidized by the homeowners association.

23 In addition, the Commission does not develop a separate charge for
24 public fire protection because the true cost of this service is
25 significant and can only be determined through a cost of service study.

1 The cost of performing such a study is prohibitive for most water
2 companies, and, therefore, is rarely done.

3 For all of these reasons, the Commission has included the cost of public
4 fire protection in the rates for service and has not made a practice of
5 developing a separate charge.

6 Q. DO YOU THINK TURKEY CREEK UTILITIES SHOULD BE ALLOWED TO CONTINUE
7 ASSESSING THIS CHARGE? WHY OR WHY NOT?

8 A. No. I believe the public fire hydrant charge should be discontinued in
9 this case. It is my understanding that since April, 1992, Mr. Hope has
10 no longer been the president or a member of the TCMOA board. In October
11 of 1992, the newly formed TCMOA board was billed for the public fire
12 protection and refused to pay, claiming that they were not aware of such
13 a charge and that there was no written agreement with the utility. A
14 copy of this bill is attached to my testimony as Exhibit No. JC-5. The
15 utility threatened to cut off service to the fire hydrants for
16 nonpayment of the bill. A motion for an emergency order was filed in
17 this case by the Office of Public Counsel asking that the Commission's
18 Prehearing Officer issue an order prohibiting the utility from
19 discontinuing service to the hydrants. Subsequently, Turkey Creek
20 Utilities agreed not to discontinue service; however, if this charge is
21 approved, the utility would be within its rights to cut off this
22 service. In my opinion and as discussed above, this is not a reasonable
23 alternative considering the potential danger to the community if water
24 service to fire hydrants is discontinued.

25 In addition, because Turkey Creek Utilities is billing the TCMOA for

1 fire protection, the equity problem discussed earlier in my testimony
2 could exist. Staff is unaware of whether all of the customers of the
3 utility are currently members of the TCMOA. However, even if this is
4 currently the case, it is possible that not every customer will be a
5 member of the association in the future. Therefore, the association
6 could be subsidizing non-members by paying the total charge for a
7 service that benefits all customers. For these reasons, I believe the
8 charge is unreasonable and discriminatory and should not be approved.
9

10 Q. DO YOU AGREE WITH MR. HOPE'S TESTIMONY ON PAGE 16 THAT IF THE UTILITY
11 IS NOT ALLOWED TO CHARGE A PUBLIC FIRE PROTECTION CHARGE, THE REVENUE
12 IMPACT WOULD BE \$1,500 PER MONTH?

13 A. No, as shown on Exhibit No. JC-5, which is a copy of the utility's bill
14 to the TCMOA for this service, the annual cost is approximately \$1,838.

15 Q. WHAT IS YOUR UNDERSTANDING OF HOW THE UTILITY CURRENTLY CHARGES
16 FOR TURNING SERVICE ON AND OFF AT A SERVICE LOCATION?

17 A. At the time of connection, the utility charges each customer \$40.00 for
18 connection and \$40.00 as a "prepaid" disconnection charge. Anytime a
19 customer requests that the utility disconnect service (such as to
20 receive service from a plumber), Turkey Creek charges \$40.00 to
21 disconnect the service and then \$40.00 to reconnect the service. In
22 addition to the above, the utility charges \$60.00 for each of the above
23 services if the service is provided after normal working hours.

24 Q. WHAT IS THE COMMISSION PRACTICE WITH REGARD TO THIS TYPE OF
25 MISCELLANEOUS SERVICE CHARGE?

1 A. The Commission practice is to set charges designed to defray the
2 administrative, office and field costs associated with processing the
3 customer request for service. In most cases, the Commission has found
4 that \$15.00 is a reasonable amount for initial connection. This charge
5 includes consideration that service to the customer ultimately will be
6 disconnected. Therefore, separate disconnect charges are not usually
7 approved by the Commission. A charge of \$15.00 is usually approved for
8 reconnection after service has been disconnected for nonpayment of a
9 bill. If a utility will accept payment at the service location in lieu
10 of disconnecting service, the Commission usually approves a charge of
11 \$10.00. Further, higher charges for work done after normal working
12 hours are only allowed if justification is provided.

13 Since the charges assessed by this utility were significantly greater
14 than the miscellaneous service charges normally approved by the
15 Commission, staff requested documentation supporting the utility's
16 charges.

17 Q. WAS ANY SUPPORTING DOCUMENTATION OF THOSE CHARGES PROVIDED?

18 A. No.

19 Q. DO YOU THINK THAT THE UTILITY'S CURRENT CHARGES ARE REASONABLE?

20 A. No. Absent any documentation supporting the utility's current charges,
21 I believe that the Commission should approve the standard charges
22 normally approved for water and wastewater utilities. These charges are
23 shown on Exhibit No. JC-6.

24 Q. DOES TURKEY CREEK UTILITIES CURRENTLY ASSESS A LATE FEE? IF SO, WHAT
25 IS THIS AMOUNT AND HOW IS IT ASSESSED?

1 A. Yes. The utility charges a late fee of \$20.00 or 10% of the amount of
2 the bill, whichever is greater.

3 Q. **WHAT IS THE COMMISSION PRACTICE REGARDING THE AMOUNT OF A LATE FEE FOR**
4 **WATER AND WASTEWATER UTILITIES?**

5 A. In recent cases, this Commission has found that \$3.00 is a reasonable
6 amount to charge as a late fee for water and wastewater utilities. This
7 amount is based on the labor and administrative costs of processing late
8 payment notices. Because the late fee charged by Turkey Creek Utilities
9 is significantly higher than that normally approved by the Commission,
10 staff requested cost justification for the charge. However, no
11 justification was ever provided.

12 Q. **WHAT DO YOU BELIEVE SHOULD BE THE LATE FEE FOR THIS UTILITY?**

13 A. Absent any justification of the current charge, I believe the late fee
14 for Turkey Creek Utilities should be reduced to \$3.00.

15 Q. **WHAT SERVICE AVAILABILITY CHARGES WERE IN EFFECT FOR TURKEY CREEK**
16 **UTILITIES ON JUNE 30, 1992?**

17 A. The utility collects a "capital facilities" charge which varies by meter
18 size. I believe the "capital facilities" charge is what the Commission
19 considers a plant capacity charge. In addition, the utility collects
20 a water meter installation charge which varies by meter size. These
21 charges are shown on Exhibit No. JC-7 attached to my testimony.

22 Q. **WHAT IS COMMISSION PRACTICE WITH REGARD TO THE ESTABLISHMENT OF A PLANT**
23 **CAPACITY CHARGE FOR WATER AND WASTEWATER UTILITIES?**

24 A. It is Commission practice to establish a "plant capacity" charge
25 designed to defray the cost of the customer's pro rata share of the

1 treatment plant. However, the plant capacity charge established by the
2 Commission is normally a charge per equivalent residential connection
3 (ERC), and not based on the meter size of the customer. The Commission
4 has found that meter size is usually not as good an indicator of the
5 demand the customer will place on the system as equating the estimated
6 flow to an ERC basis.

7 **Q. WHAT IS YOUR RECOMMENDATION WITH REGARD TO A PLANT CAPACITY CHARGE FOR**
8 **THIS UTILITY?**

9 **A.** I believe a plant capacity charge per ERC should be approved for the
10 water and wastewater systems equal to the "capital facilities" charge
11 in effect on June 30, 1992 for the standard 5/8 x 3/4" meter. These
12 would be the plant capacity charges collected for all future residential
13 connections to the water and wastewater systems. Plant capacity charges
14 for all future non-residential connections would be based on an
15 engineering estimate of the demand of the customer in terms of ERCs.
16 The plant capacity charges I am recommending are contained in Exhibit
17 No. JC-8.

18 **Q. ARE THE UTILITY'S METER INSTALLATION CHARGES SHOWN ON EXHIBIT NO. JC-7**
19 **SIGNIFICANTLY HIGHER THAN THOSE NORMALLY APPROVED BY THIS COMMISSION FOR**
20 **WATER UTILITIES?**

21 **A.** Yes. It is Commission practice to establish meter installation charges
22 by which the utility recovers only the cost of installing the device at
23 the point of delivery including materials and labor required. Usually
24 the cost of tapping into the utility's main and running a line to the
25 customer's meter is a separate charge based on actual cost since it can

1 vary substantially. Normally, the meter installation fee for a standard
2 5/8 x 3/4" meter is approximately \$125. Since Turkey Creek's meter
3 installation charges are significantly higher, staff believes the
4 utility is including the cost of the customer connection to the main in
5 this fee. Therefore, staff recommended that a meter installation fee
6 be broken out of the utility's charges and shown separately. In
7 addition, the utility should be allowed to collect a customer connection
8 charge based on the actual cost of connecting to the utility's main.
9 Exhibit No. JC-8 contain all of the staff recommended service
10 availability charges.

11 Q. HAVE YOU REVIEWED MR. HOPE'S EXHIBIT "F" ATTACHED TO HIS TESTIMONY?

12 A. Yes, this exhibit lists the components of the utility's current
13 meter installation charge.

14 Q. DO YOU HAVE ANY COMMENTS WITH REGARD TO MR. HOPE'S EXHIBIT "F"?

15 A. Yes, I do. Some of the components of that exhibit are not normally
16 recovered through a meter installation charge. In addition, I believe
17 the cost associated with other components on the list are excessive.
18 I have attached to my testimony a copy of Mr. Hope's exhibit with my
19 corrections noted on it as Exhibit No. JC-9.

20 Q. WHAT COST COMPONENTS ON THE LIST ARE NOT NORMALLY INCLUDED IN A METER
21 INSTALLATION CHARGE?

22 A. The cost for the main shut-off valve, the plastic flex pipe, the brass
23 T and the lockable curb stop, lock and washer are not normally included
24 in a meter installation charge.

25 Q. HOW ARE THE COSTS FOR THESE ITEMS NORMALLY RECOVERED IF NOT IN A METER

1 **INSTALLATION CHARGE?**

2 A. These items are part of the customer connection to the utility's main
3 at the curb and are usually installed when the main is installed. Often
4 this work is done by the developer and donated to the utility. In such
5 cases, the utility does not charge the homeowner for these items since
6 they were donated to the utility as CIAC. The customer should only be
7 charged for connection to the utility's main when the utility completes
8 the construction. In such cases, a separate charge for tapping in to
9 the utility's main would be appropriate. It is important to charge
10 separately for the tap-in and meter installation to ensure that there
11 is no double recovery of the cost of connection to the main. This is
12 the basis for the decision in PAA Order No. PSC-93-0816-FOF-WS, wherein
13 the Commission set meter installation charges based on the cost of
14 installing the device at the point of delivery and allowed the utility
15 to collect a customer connection charge based on the cost of connecting
16 to the utility's main.

17 Q. **WHAT COST COMPONENTS INCLUDED ON MR. HOPE'S EXHIBIT "F" DO YOU CONSIDER**
18 **EXCESSIVE?**

19 A. According to the exhibit, there are two meter boxes included in the
20 components for meter installation. There is only one meter box needed
21 for each meter installed; therefore, this amount should be reduced by
22 one-half.

23 In addition, the cost of labor for the mechanic and helper appear to be
24 excessive. Mr. Hope indicates that it would take six hours for the
25 mechanic to install the meter and two hours for a helper. Usually a

1 meter installation should take no more than one hour. I believe Mr.
2 Hope has included the labor time involved in tapping into the utility's
3 main, which as discussed above, would more appropriately be recovered
4 in the customer tap-in fee. Therefore, these labor costs should be
5 reduced to one-sixth for the mechanic and one-half for the helper.
6 Further, the costs included for truck, tools, overhead, insurance, etc.
7 appear to be excessive. These costs should be reduced to approximately
8 one-sixth of the amounts stated.

9 **Q. AFTER YOU MAKE THE CHANGES TO MR. HOPE'S EXHIBIT "F" DISCUSSED ABOVE,**
10 **WHAT DOES THE ANALYSIS INDICATE SHOULD BE THE METER INSTALLATION CHARGE**
11 **FOR A 5/8" METER?**

12 **A.** As shown on my Exhibit No. JC-9, after eliminating or reducing the costs
13 discussed above, the cost of installing a 5/8" x 3/4" meter would be
14 approximately \$121.93. Based on this, I believe the meter installation
15 charge for a 5/8" x 3/4" meter should be \$125.00.

16 **Q. DOES THIS UTILITY PROVIDE WATER SERVICE TO ANY UNMETERED LOCATIONS?**

17 **A.** Yes. There are currently seven unmetered irrigation locations
18 which receive service from Turkey Creek. Two of these are located at
19 a condominium in the Turkey Creek Subdivision and the remaining five are
20 at common areas of the Turkey Creek Subdivision. The condominium was
21 charged a flat rate of \$21.40 per location on June 30, 1992. According
22 to the utility, the rate was agreed upon by the utility and the
23 condominium.

24 Service to the five remaining unmetered locations has been disconnected
25 because the TCMOA refused to pay the bills. However, the utility has

1 | stated that it will reconnect service to these locations and install
2 | water meters if the association agrees to pay the meter installation
3 | charges.

4 | **Q. WHAT ACTION DO YOU BELIEVE SHOULD BE TAKEN WITH REGARD TO SERVICE TO**
5 | **UNMETERED LOCATIONS?**

6 | **A.** For conservation purposes, I believe all water service should be
7 | metered, especially water used for irrigation. The utility is located
8 | within an area designated by the St. Johns River Water Management
9 | District as a water use caution area, which means that the area either
10 | has existing water resource problems or such problems are projected to
11 | develop during the next twenty years. In addition, the utility has
12 | stated to staff that it will install meters at these locations if the
13 | customers pay the appropriate fees. I believe that if the customers
14 | desire irrigation service at these locations, meters should be installed
15 | at the customer's expense. The size of the meter installed should be
16 | determined by the customer. The utility will then be required to charge
17 | the approved water rates for General Service Customers.

18 | **Q. HAVE YOU BEEN ADVISED BY CUSTOMERS OF THIS UTILITY THAT TURKEY CREEK**
19 | **UTILITIES HAS INSTALLED ONE INCH METERS AT LOCATIONS WITHOUT THE**
20 | **CUSTOMER'S REQUEST?**

21 | **A.** It has been alleged by customers that Mr. Hope is installing one inch
22 | meters on some residential property by his own choice, rather than the
23 | standard 5/8" x 3/4" meter. The effect on the customers of having the
24 | larger meter is that the utility charges the higher service availability
25 | charges and, because of the utility's rate structure, a higher minimum

1 charge for service each month. As shown on Exhibit No. JC-3, the
2 utility's rate structure includes a minimum charge containing some usage
3 which varies by meter size. The usage included in the minimum charge
4 for a standard 5/8" x 3/4" meter is 4,000 gallons; that included in the
5 minimum charge for a 1" meter is 6,000 gallons.

6 Staff asked the utility whether it was installing one inch meters at
7 residential locations without a request from the customer. Mr. Hope was
8 nonresponsive, neither confirming nor denying that the utility was doing
9 this.

10 Q. **WHAT ACTION DO YOU BELIEVE SHOULD BE TAKEN WITH REGARD TO THIS MATTER?**

11 A. If it is established that the utility is installing one inch meters
12 without the customer's request, I believe the utility should be required
13 to install at no cost to the customer the standard 5/8" x 3/4" meter at
14 these locations and begin billing the rates applicable to the smaller
15 size meter. In the alternative, the utility may elect not to change out
16 the meter. However, in that case, the utility should be required to
17 begin billing as if the customer were receiving service from a 5/8" x
18 3/4" meter, which is the Commission's general practice.

19 Q. **HAVE YOU REVIEWED THE STANDARD APPLICATION FOR SERVICE SUBMITTED BY THE
20 UTILITY IN ITS TARIFF?**

21 A. Yes, and I found that there are portions of the standard form which I
22 believe should be deleted or revised. A copy of the form, which is
23 contained in the utility's tariff, is attached to my testimony for ease
24 of reference as Exhibit No. JC-10. The specific paragraphs in the form,
25 which I believe should be deleted, are numbered 9, 10, 13, and 15.

1 Q. PLEASE EXPLAIN.

2 A. Paragraph 9 provides: "I further agree to be responsible for any damage
3 done to any seals, material or equipment of Turkey Creek Utilities."
4 This statement should be deleted. It is unfair for the utility to
5 require the applicant to assume total liability for any damage that may
6 be done in the future to utility property. If such damage occurs in the
7 future, the liability should be determined on a case-by-case basis.

8 Paragraph 10 provides: "I am not to use any water, except as approved
9 in writing by Turkey Creek Utilities on or in connection with the above
10 premises which is not furnished or supplied by Turkey Creek Utilities,
11 or its successors, designees, nominees, or assignees." This statement
12 should be deleted. The utility does not have the authority to approve,
13 nor can the Commission sanction, how an individual receives water
14 service. County ordinance or deed restrictions will determine whether
15 or not private wells are allowed, not the water utility.

16 Paragraph 13 provides: "water from a well, stream, lake or basin may
17 be used only for the purpose of watering grass, shrubs, gardens, and as
18 approved in writing by Turkey Creek Utilities." As with paragraph 10,
19 this statement should be deleted because neither the utility nor the
20 Commission has the authority to approve how the customer receives water
21 service.

22 Paragraph 15 provides: "I agree to be responsible for all attorneys'
23 fees and costs incurred on behalf of Turkey Creek Utilities as a result
24 of action taken to collect any charges incurred by me." This statement
25 should be deleted because it assumes guilt on the part of the customer

1 in any action taken by the utility. The Commission does not have the
2 authority to sanction such a presupposition of a liability of the
3 customers. Also, I have been advised by the Commission's legal staff
4 that there are statutory remedies to provide for the recovery of
5 attorney's fees and costs when determined by the appropriate body to be
6 justified.

7 In addition, Paragraphs 2, 5 and 6 contain references to charges which
8 staff is recommending either be eliminated or reduced, such as the late
9 fee and disconnection fee. These paragraphs should be revised in the
10 form upon decision of the Commission with regard to these charges.

11 Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?

12 A. Yes, it does.

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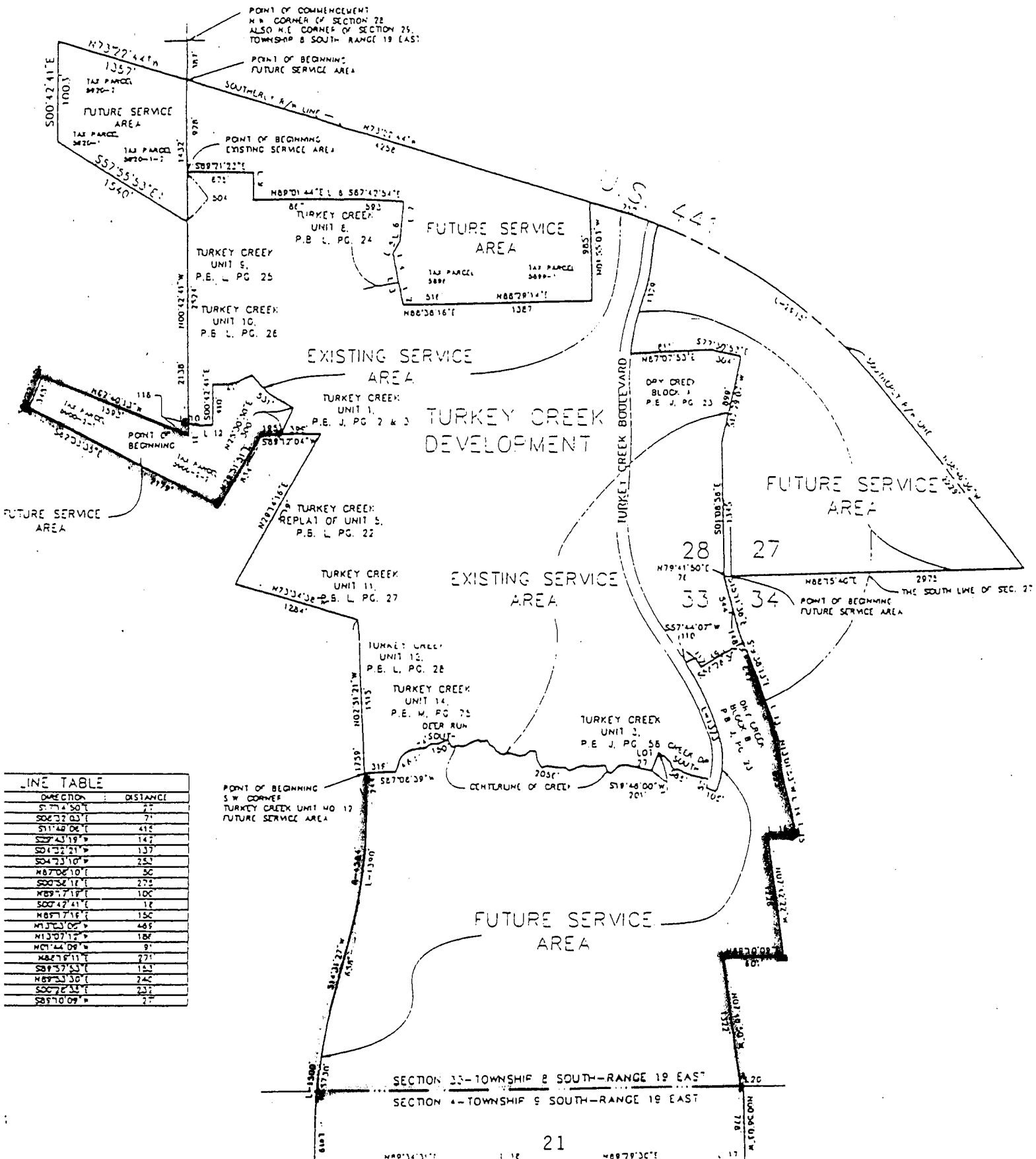
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LINE TABLE

DIRECTION	DISTANCE
S 77° 45' 00" E	77
S 06° 32' 03" E	71
S 11° 48' 08" E	418
S 57° 43' 19" W	147
S 01° 32' 21" W	137
S 04° 23' 10" W	252
N 87° 06' 10" E	50
S 00° 32' 17" E	272
N 89° 17' 19" E	100
S 00° 42' 41" E	12
N 89° 17' 19" E	150
N 13° 03' 00" W	469
N 13° 07' 12" W	188
N 01° 44' 09" W	91
N 82° 19' 11" E	271
S 89° 57' 53" E	153
N 89° 23' 30" E	240
S 00° 27' 33" E	232
S 89° 10' 09" W	27

SECTION 33-TOWNSHIP 8 SOUTH-RANGE 19 EAST
 SECTION 4-TOWNSHIP 9 SOUTH-RANGE 19 EAST

SERVICE TERRITORY DESCRIPTION - TURKEY CREEK, INC.

A part of Sections 27, 28, 32, 33, and 34, Township 8 South, Range 19 East, and a part of Section 4, Township 9 South, Range 19 East, Alachua County, Florida; being more particularly described as follows:

Commence at the northwest corner of said Section 28 and run South $00^{\circ} 42' 41''$ East, along the west line of said Section 28, 1315 +/- feet, to the Point of Beginning; thence South $89^{\circ} 21' 23''$ East, 675 +/- feet; thence South $00^{\circ} 58' 16''$ East, 275 +/- feet; thence easterly the following courses: North $89^{\circ} 01' 44''$ East, 867 +/- feet; North $87^{\circ} 08' 10''$ East, 50 +/- feet; South $87^{\circ} 42' 54''$ East, 593 +/- feet; thence southerly the following courses: South $04^{\circ} 23' 10''$ West, 253 +/- feet; South $04^{\circ} 32' 21''$ West, 137 +/- feet; South $29^{\circ} 43' 19''$ West, 142 +/- feet; South $11^{\circ} 49' 06''$ East, 305 +/- feet; South $11^{\circ} 49' 06''$ East, 110 +/- feet; South $08^{\circ} 32' 03''$ East, 71 +/- feet; South $17^{\circ} 14' 50''$ East, 27 +/- feet; thence easterly the following course: North $88^{\circ} 38' 16''$ East, 516 +/- feet; North $88^{\circ} 29' 14''$ East, 1387 +/- feet; thence North $01^{\circ} 55' 03''$ West, 985 +/- feet; to the southerly right-of-way line of U.S. - 441; thence southeasterly along said right-of-way line 712 +/- feet, thence South $9^{\circ} 30'$ West, 550 +/- feet; thence South 12° West, +/- 780 feet; thence North $87^{\circ} 07' 53''$ East, 811 +/- feet; South $77^{\circ} 30' 53''$ East, 304 +/- feet; South $12^{\circ} 29' 07''$ West, 899 +/- feet; South $01^{\circ} 08' 58''$ East, 1345 +/- feet; South $15^{\circ} 11' 38''$ East, 544 +/- feet; South $19^{\circ} 38' 13''$ East, 148 +/- feet; South $19^{\circ} 38' 13''$ East, 647 +/- feet; South $13^{\circ} 03' 06''$ East, 469 +/- feet; South $13^{\circ} 01' 53''$ East, 623 +/- feet; South $13^{\circ} 07' 12''$ East, 186 +/- feet; South $01^{\circ} 44' 09''$ East, 91 +/- feet; South $88^{\circ} 19' 11''$ West, 271 +/- feet; South $07^{\circ} 42' 22''$ East, 1226 +/- feet; South $89^{\circ} 10' 09''$ West 601 +/- feet; South $07^{\circ} 48' 50''$ East, 1322 +/- feet to the South line of Section 33, Township 8 South, Range 19 East; North $89^{\circ} 10' 09''$ East 27 +/- feet; Thence entering Section 4, Township 9 South, Range 19 East; South $00^{\circ} 56' 03''$ East, 778 +/- feet; North $89^{\circ} 57' 53''$ West, 153 +/- feet; South $89^{\circ} 29' 30''$ West, 1940 +/- feet; South $89^{\circ} 53' 30''$ West 240 +/- feet; South $89^{\circ} 34' 31''$ West 1935 +/- feet; North $00^{\circ} 28' 35''$ West 232 +/- feet to the beginning of a curve concave easterly and having a radius of 5730 +/- feet; thence Northerly along said curve 1500 +/- feet to the end of said curve, (or approximately North 1° East, 500 +/- feet to the North line of Section 4, Township 9 South, Range 19 East; and North 9° East, 950 +/- feet); thence North $14^{\circ} 31' 27''$ East, 658 +/- feet to the beginning of a curve concave westerly and having a radius of 4584 +/- feet; thence Northerly along said curve 1390 +/- feet to the end of said curve, (or approximately North 12° East, 600 +/- feet; and North 4° East 725 +/- feet); thence North $02^{\circ} 51' 21''$

West, 1759 +/- feet; thence North 73° 34' 38" West, 1284 +/- feet; thence North 29° 14' 16" East, 1719 +/- feet; thence South 89° 12' 04" West, 594 +/- feet; thence South 29° 51' 51" West, 834 +/- feet; thence North 62° 33' 35" West, 2179 +/- feet; North 23° 27' 51" 345 +/- feet; Thence South 67° 40' 13" East, 1593 +/- feet; thence North 00° 42' 41" West, 2642 +/- feet to the Point of Beginning.

WATER SYSTEM

Residential and General Service

Monthly Rates

In Effect on June 30, 1992

Minimum Charge by Meter Size:

Meter Size

5/8 x 3/4" (includes 4,000 gal.)	\$ 10.35
1" (includes 6,000 gal.)	12.05
1 1/2" (includes 20,000 gal.)	23.95
2" (includes 40,000 gal.)	40.95

Gallonage Rates: \$.85 per 1,000 gallons
(over minimum allowance)

General Service

Two unmetered locations: \$ 21.40 per month (As of June 30, 1992)

WASTEWATER SYSTEM

Residential Service

Monthly Rates

In Effect on June 30, 1992

All meter sizes:

Minimum Monthly Charge: \$ 23.75
(includes 4,000 gallons consumption)

Gallage Charge 3.90 per 1,000 gallons up
(over 4,000 gallons) to 7,000 gallons

Maximum Monthly Charge: \$ 35.45

General Service

Monthly Rates

There are five general service customers who receive wastewater service from Turkey Creek Utilities. All of these customers pay the above-noted rates for service. However, for two customers, the utility adjusts the amount of water to which the rates apply to reflect that not all water usage is returned to the wastewater system. The utility applies the rates to 75% of the water consumption of the clubhouse of the Turkey Creek Country Club and to 30% of the water consumption of the maintenance house of the Turkey Creek Country Club.

2900 Turkey Creek Boulevard
158 Turkey Creek
Alachua, Florida 32615-9513
Phone (904)462-5653

Docket No. 921098-WS
Florida Public Service Commission
JC-4
Page 1 of 3

FEB 15 AM 9:31

MAIL ROOM

February 11, 1993

Mrs. Edie Xanders
Public Service Commission
Fletcher Building
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. 921098-WS

Dear Mrs. Xanders:

The following is in response to your letter dated January 25, 1993.

1. We do not remember any incidents of changing out a 5/8" meter to a 1" meter. We would like the name of the customer who advised that we did this and an approximate date.
2. Turkey Creek Country Club is the only General Service customer that we have at the present time and the following are their seven (7) meter locations together with the meter sizes:
 - 5/8" meter - two rain shelters
 - 1" meter - swimming pool-recreation building
 - 1" meter - island irrigation at front of clubhouse
 - 1" meter - maintenance building
 - 2" meter - clubhouse
 - 1" meter - sod farm
3. While we have been in the transition, we did inadvertently have two different due dates on the bill. However, we have not charged any late fees until the correct due date which was always the later of the two, and this has since been corrected.
4. Our late fee is and always has been \$20.00 or 10%, whichever is greater and is assessed each month until the bill is paid in full. Our late fee is assessed the day after the due date.
5. Our fire hydrant service fee of \$19.98 per fire hydrant per year was designed just as a token fee as payment for furnishing fire hydrant service, maintenance, and water to each fire hydrant. The City of Gainesville charges the unincorporated areas of the county a fee of \$18.98 per fire hydrant per month and we intend to put in for a higher fee as soon as you tell us that we may apply for same.



-2-

6. The \$40.00 connection fee and the \$40.00 disconnection fee are charged at the initial connection. Yes, we do assess a cut-on and cut-off charge any time a customer requests us to turn off his service. You must also recognize that there is a plumbing code that requires each house to have a water cut-off valve within 5' of the residence and each home or unit in Turkey Creek has this cut-off. In fact, sometime ago we advised all customers who were unable to locate their cut-off valve and wanted to install a cut-off valve in their line so that they would not have to pay for our service that we would turn off their water free of charge for this to be done. However, very few customers took advantage of this, and the problem is that people are too lazy to use their own cut-off valve. A parallel to this would be asking the electric company to pull their meter every time there is an electrical fault in the house. The \$60.00 after hours charge is merely time and a half. I think this is standard with most service companies. We either place a padlock or some locking device on our meters when they are turned on or off to lock them either on or off. The only reason for an emergency situation is because the customer will not use his own cut-off valve. If you need further explanation, please advise your specific questions and we will try to explain further.

7. There are two unmetered irrigation locations that are just too much trouble for the customer to meter. We arrived at a price which was mutually agreeable and we have both agreed to be reasonable with each other. So far, we have not had any problems. The customers understand that these locations can be metered at their request at any time they so desire upon payment of appropriate charges.

8. Forwarded herewith is a letter which we wrote to Mr. Junius Jones concerning the unmetered irrigation locations for the TCMOA. We feel that this is now moot since they have been disconnected permanently.

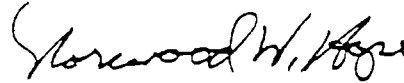
9. This matter has been reduced to court action and the TCMOA has requested a jury trial. This is in the process of litigation so we are unable to advise what amounts TCMOA will owe.

10. One month we did assess a 25¢ pass through charge which we understood we could do. However, since that time we corrected this and returned the 25¢ charge to each customer the next month pursuant to your request.

Several months ago we gave you the information that is contained in No. 2 through 10 and are just reiterating that at this time, but if this is not clear at this time, please advise.

We wrote you a letter requesting that we be furnished with a copy of any and all complaints, whether in writing, telephonic or in person, concerning Turkey Creek Utilities. You sent us five or six written complaints but we know, and even your letter of January 25, 1993, says that you have received other complaints. We want a copy of any and all complaints, whether in writing, telephonic or in person, concerning Turkey Creek Utilities. We do not think this is unreasonable. If you think so, please advise why. Yours very truly,

TURKEY CREEK UTILITIES



Norwood W. Hope

cc: John Wharton

Encl.

TURKEY CREEK UTILITIES
 KEEP THIS HALF FOR YOUR RECORDS

	AMOUNT	CODE
10/12/92		
Fire Hydrant Service Fee for year 1992		
92 hydrants at \$19.98 each	\$1,838.16	
Please see reverse side A 10% late fee will be added if not paid when due		

TURKEY CREEK UTILITIES
 158 Turkey Creek
 Alachua, FL 32615-9513



Turkey Creek Master Owners
 Association, Inc.
 Suite 30
 P. O. Box 147050
 Gainesville, FL 32614-7050

RETURN THIS HALF WITH PAYMENT

\$	\$	\$ 1,838.16	\$	\$	\$ 1,838.16
AMOUNT PAST DUE	CURRENT BILLING	TOTAL	AMOUNT PAST DUE	CURRENT BILLING	TOTAL

BILLS ARE DELINQUENT AFTER THE 10TH OF THE MONTH

BILLING DATE	10/12/92	ACCOUNT NO.		BILLING DATE	10/12/92	ACCOUNT NO.	
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RECOMMENDED MISCELLANEOUS SERVICE CHARGES

<u>TYPE OF SERVICE</u>	<u>WATER</u>	<u>WASTEWATER</u>
Initial Connection	\$15.00	\$15.00
Normal Reconnection	\$15.00	\$15.00
Violation Reconnection	\$15.00	Actual cost
Premises Visit (in lieu of disconnection)	\$10.00	\$10.00

When both water and wastewater service is provided, only a single charge is appropriate unless circumstances beyond the control of the utility require multiple actions.

UTILITY'S SERVICE AVAILABILITY CHARGES

In Effect June 30, 1992

Capital Facilities Charges

Water System:

<u>Meter Size</u>	<u>Charge</u>
5/8 x 3/4"	\$380.00
1"	545.00
1 1/2"	675.00
2"	900.00

Wastewater System:

<u>Meter Size</u>	<u>Charge</u>
5/8 x 3/4"	\$440.00
1"	590.00
1 1/2"	725.00
2"	950.00

Meter Installation Charges

<u>Meter Size</u>	<u>Charge</u>
5/8 x 3/4"	\$375.00
1"	460.00
1 1/2"	675.00
2"	900.00

RECOMMENDED SERVICE AVAILABILITY CHARGES

Plant Capacity Charge

Water System: \$380.00 per ERC

Wastewater System: \$440.00 per ERC

Meter Installation Charges

<u>Meter Size</u>	<u>Charge</u>
5/8" x 3/4"	\$125.00
1"	\$175.00
Above 1"	Actual cost

In addition, the utility should be allowed to collect a customer connection charge based on the cost of connecting to the utility's main.

TYPICAL WATER METER INSTALLATION COST

	<u>5/8"</u>	<u>1"</u>
1 Main Shut-off Valve	\$ 14.10	\$ 26.15
5' 1" Plastic Flex Pipe @ 52¢/ft.	16.20	18.20
3 1/2 1" Brass T @ \$16.41	6.21	8.21
Lockable Curb Stop, Lock & Washer	15.94	23.89
Meter	36.50	97.10
2 Plastic Meter Boxes & Covers @ \$13.33 ea.	26.66 13.33	26.66
1 PVC Ball Shut-off Valve	12.25	18.28
1 PVC Ball Check Valve	26.18	31.14
1 1/2 hrs. Mechanic @ \$7.00/hr.	42.00 7.00	42.00
1 1/2 hrs. Helper @ \$5.25/hr.	63.00 5.25	63.00
Truck, tools, misc.	66.00 11.00	66.00
Overhead, insurance, etc.	62.52 10.42	78.96
TOTAL COST	\$391.56 \$121.93	\$494.59

~~There is no cost included in the above for the two trips which have to be made to locate the water and sewer entry for the customer or to make an inspection of sewer connection.~~

~~EXHIBIT "F"~~

NAME OF COMPANY Family Biner, Inc. and Turkey Creek, Inc.
WATER TARIFF d/b/a Turkey Creek Utilities

Docket No. 921098-WS
Florida Public Service Commission
JC-10
Page 1 of 1

APPLICATION FOR WATER SERVICE

TURKEY CREEK UTILITIES
APPLICATION FOR RESIDENTIAL WATER AND WASTEWATER SERVICE

For a total of \$175.00 which represents a deposit of \$95.00, a connection fee of \$40.00, and disconnection fee of \$40.00, I do hereby apply for the services of Turkey Creek Utilities to serve water and sewer to:

Name _____ Location: Lot _____
Street Address _____ Billing Address: _____
Phone No. _____ to begin on _____ I understand and agree as follows:

1. I will receive interest on my deposit money as set by the PSC rules.
 2. Service connections or disconnections at the customer's request will only be done upon 3 working days written notice and during normal business hours of Turkey Creek Utilities. A \$40.00 fee will be charged where any service is connected or disconnected for any reason during normal business hours. Any connections or disconnections at any other time will be charged at the rate of \$60.00 each.
 3. All payments for service shall be made in person or by mail at the office of Turkey Creek Utilities in Alachua, FL.
 4. If service is rendered for less than fifty percent of the normal billing cycle, Turkey Creek Utilities shall prorate as per PSC rules.
 5. If I do not pay for this service, plus applicable taxes thereon, on or before 4:30 P.M. on the 20th day after said bill has been mailed or presented for payment, it will be delinquent and I will pay a late charge of \$20.00 or 10% of the unpaid balance, whichever is greater, per month until paid.
 6. My service will be discontinued after 5 working days written notice of said account being delinquent and pursuant to PSC rules for non-compliance with the rules and regulations, and before service may be reinstated, my account with Turkey Creek Utilities must be paid current, including the appropriate disconnection and reconnection fees.
 7. The above mentioned deposit may be used to pay any delinquency on my account, and said deposit is refundable to me, provided my account with Turkey Creek Utilities is paid-in-full.
 8. I am not to remeter, resell, allow to be used on another property or residence, any water obtained from Turkey creek Utilities and that I will not allow other water to be connected with the water system of Turkey Creek Utilities.
 9. I agree not to tamper with, damage or destroy any seals, material or equipment of Turkey Creek Utilities. I further agree to be responsible for any damage done to any seals, material or equipment of Turkey Creek Utilities.
 10. I am not to use any water, except as approved in writing by Turkey Creek Utilities on or in connection with the above premises which is not furnished or supplied by Turkey Creek Utilities or its successors, designees, nominees or assignees.
 11. I will not allow any water or waste, except normal human and kitchen waste generated in my residence, to enter the wastewater system of Turkey Creek Utilities. If I allow anything other than this to enter the wastewater system of Turkey Creek Utilities, I hereby agree to pay all costs involved in the repair or maintenance of the wastewater system as a result of this entry.
 12. I agree that I will be responsible for all functions or malfunctions of the water and wastewater service from the point of collection into and including my system.
 13. Water from a well, stream, lake or basin may be used only for the purpose of watering grass, shrubs, gardens, and as approved in writing by Turkey Creek Utilities.
 14. A designated official from Turkey Creek Utilities may inspect my water or wastewater system on my property at any reasonable hour to determine compliance with this application. I further understand that if I am not complying with all conditions on this application, that my water and wastewater service will be discontinued pursuant to PSC rules.
 15. I agree to be responsible for all attorneys' fees and costs incurred on behalf of Turkey Creek Utilities as a result of action taken to collect any charges incurred by me.
- I hereby agree to pay the rates and obey/follow rules as may be set or amended from time to time by Turkey Creek Utilities and/or PSC.

Signature _____

Date: _____

Social Security No. _____

Norwood W. Hope
ISSUING OFFICER
President
TITLE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificates) DOCKET NO. 921098-WS
to provide water and) FILED: SEPTEMBER 20, 1993
wastewater service in Alachua)
County under grandfather)
rights by TURKEY CREEK, INC.)
& FAMILY DINER, INC. d/b/a)
TURKEY CREEK UTILITIES)

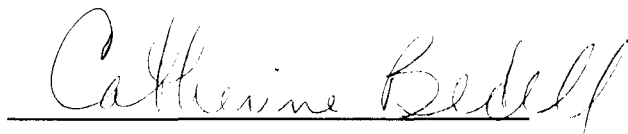
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Prefiled Direct Testimony of JoAnn Chase filed in this proceeding on behalf of the Staff of the Florida Public Service Commission has been furnished by U. S. Mail on the 20th day of September, 1993, to the following persons:

John L. Wharton, Esquire
2548 Blairstone Pines Drive
Tallahassee, Florida, 32301

Stephen C. Reilly, Esquire
Office of Public Counsel
Room 812
111 West Madison Street
Tallahassee, Florida 32399-1400

Peter C.K. Enwall
211 NE First Street
Post Office Box 23879
Gainesville, Florida 32602



Catherine Bedell, Staff Attorney

FLORIDA PUBLIC SERVICE COMMISSION
101 East Gaines Street
Tallahassee, Florida 32399-0863
(904) 487-2740