

ORIGINAL
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ST. GEORGE ISLAND UTILITY COMPANY, LTD.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
REGARDING THE APPLICATION FOR INCREASED RATES FOR
ST. GEORGE ISLAND UTILITY COMPANY, LTD.

IN FRANKLIN COUNTY

DOCKET NO. [REDACTED]

REBUTTAL TESTIMONY OF

MARVIN H. GARRETT

RECEIVED BY DATE

06777 JUL-7 65

FPSC-REGULATORY REPORTING

1 REBUTTAL TESTIMONY OF MARVIN H. GARRETT
2 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
3 REGARDING THE APPLICATION FOR INCREASED RATES FOR
4 ST. GEORGE ISLAND UTILITY COMPANY, LTD.
5 IN FRANKLIN COUNTY
6 DOCKET NO. 940109-WU

7
8
9 Q. Please state your name and address.

10 A. Marvin H. Garrett. My address is Eastpoint, FL 32328.

11
12 Q. Have you previously filed direct testimony in this
13 proceeding?

14 A. No.

15
16 Q. What is the purpose of your rebuttal testimony?

17 A. To rebut some of the direct testimony presented by OPC
18 and PSC witnesses.

19
20 Q. Where do you work?

21 A. St. George Island Utility Company.

22
23 Q. What is your position?

24 A. I am the operations manager on St. George Island.

25

1 Q. Do you hold any special licenses?

2 A. Yes, I have a Class "C" water operator's license.

3

4 Q. How long have you worked for St. George Island Utility
5 Company?

6 A. I started in 1984 and left in 1988. I then came back
7 to work in December of 1990 and have worked
8 continuously full time for the company since that time.

9

10 Q. Why did you leave in 1988?

11 A. I was looking for a career in utility operations and
12 wanted security and benefits which St. George Island
13 Utility could not offer.

14

15 Q. What were your duties when you first worked for the
16 company between 1984 and 1988?

17 A. I was a field assistant. My duties included repairing
18 leaks, running lines, installing services, reading
19 meters, disconnecting service, and all of the normal
20 duties that are required of water utility employees on
21 St. George Island.

22

23 Q. Did you work alone?

24 A. No, there were always two workmen or field assistants,
25 myself and one other man.

1 Q. Who was the operator of the system at that time?

2 A. Harry Braswell, who lives in Apalachicola, was the
3 Class "C" operator for the utility company on St.
4 George Island. However, he only worked part time. He
5 was also the operator for the Apalachicola water and
6 sewer system.

7

8 Q. What did you do when you left the utility company in
9 1988?

10 A. I went to work for the City of Apalachicola in a
11 similar capacity, as a field assistant or workman for
12 the Apalachicola water and sewer division.

13

14 Q. Who did you work for?

15 A. I reported directly to Harry Braswell, who was also
16 still serving as the Class "C" operator for the St.
17 George Island Utility Co.

18

19 Q. Did you have a operator's license when you worked for
20 the City of Apalachicola?

21 A. During the time I worked for the City, I obtained my
22 Class "C" sewer operator's license. However, I did not
23 have a Class "C" water operator's license.

24

25

1 Q. Did you have any employee benefits while you worked for
2 the City of Apalachicola.

3 A. Yes, we had a pension plan, vacation, sick leave and
4 regular salary increases.

5
6 Q. Why did you leave the City?

7 A. I had no plans to leave the City, but Gene Brown called
8 me in December of 1990 and asked if we could meet and
9 talk about coming back to work for the water company.

10 When we met, Gene explained that the utility company as
11 having problems and that it needed a full time Class
12 "C" operator on the island to begin solving the
13 problems and to bring the level of service up to where
14 he thought it should be. Gene told me that he had
15 terminated the operating agreement with Harry Braswell,
16 and that he had hired Wayne Conrad and his company,
17 Southern Water Services, as his qualified Class "C"
18 operator to oversee the water company operations.

19 Q. What promises, if any, did Mr. Brown make to you.

20 A. Gene basically pleaded with me to leave the City and
21 come back to work for the water company as a full time
22 operation's manager. He promised that he would give me
23 full authority to immediately hire one full time field
24 assistant, and that another full time assistant would
25 be added as soon as possible.

1 Q. What about transportation?

2 A. Gene and I both understood that the job would require
3 the full time, seven day per week, use of a good 4-
4 wheel drive truck. Gene promised that if I would go
5 and buy a new 4-wheel drive truck in my name, that he
6 would pay me an adequate transportation allowance of
7 \$200 per week to cover the wear and tear on the truck,
8 insurance, maintenance and other expenses of using my
9 new truck on water company business.

10 Q. What commitments were made by you and Gene Brown at
11 that time?

12 A. I committed to leave my secure job with the City and to
13 come to work immediately for the utility company. I
14 also committed to spend whatever time and energy that
15 was required to solve all of the water company's
16 operational problems on the island, which Gene and I
17 knew would take a full time, seven day per week effort.
18 I committed to immediately obtain my Class "C" water
19 operator's license, which only took a short time, since
20 I had already taken the necessary course and was
21 qualified to take the test. This was a promise by me
22 which would enable Gene to terminate his operating
23 contract with Wayne Conrad and Southern Water Service,
24 which was costing the water company a great deal of
25 money. I also committed to buy a new 4-wheel drive

1 truck which I knew I would have to have to do the job.
2 Gene committed to provide the necessary money to get
3 the job done, and to allow me to hire one person at
4 first, with a promise that an additional person could
5 be hired as soon as possible. He also committed to
6 other benefits in the future.

7 **Q. Have these commitments been met?**

8 A. Yes. I got my Class "C" operator's license, which
9 allowed Gene Brown to terminate his other operator. I
10 also purchased a new 4-wheel drive truck and I hired a
11 good man to help me. Gene has met his commitments by
12 providing the necessary money to do the job, and by
13 paying me everything that I was promised. He has also
14 continued to provide direct management.

15 **Q. Can you describe Gene Brown's ability as a manager?**

16 A. I think he is an outstanding manager. When I was
17 hired, Gene set one basic overall goal, to solve all of
18 the existing operational problems, to make the
19 necessary improvements to the system, and to bring the
20 level of service into full compliance with all DEP and
21 PSC requirements while providing a safe and adequate
22 supply of water to all of our customers. This goal has
23 been met by Gene and me working as a team. I talk with
24 him daily, either at his office, at his house, on his
25 mobile phone, or personally when he comes to the island

1 or I go to Tallahassee. He is always available to
2 advise and assist me in whatever I am doing and in
3 whatever problem I may be having. I can remember
4 calling him on his mobile phone during weekends when we
5 have had pump failures or other operational problems.
6 He has always responded immediately by doing whatever
7 is necessary to get the job done. This has included
8 his calling contractors at home on the weekend to
9 insist that they immediately go to the island and
10 install a new pump to avoid any possibility of an
11 outage, and it has included things like picking up a
12 new 400 pound transformer in his truck and meeting me
13 on the road in my truck so that the part could be
14 immediately installed without any break in service. We
15 often talk from our home telephones or on our mobile
16 phones. In my opinion, both of our mobile phones are
17 an absolute necessity if the company is to be managed
18 efficiently, and if we are to continue operating with
19 very little possibility of an outage, which were
20 frequent before I took this job.

21 **Q. How many outages have you had since you took over as**
22 **operation's manager?**

23 **A.** We had one overall outage for approximately 15 or 20
24 minutes when the chlorination system blew up, requiring
25 the system to be temporarily shut down. We have made

1 arrangements to assure that this does not happen again.
2 We have had a few partial interruptions in service when
3 I had to cut off a portion of the lines to work on the
4 system. However, these are advertised in advance and
5 they are only temporary.

6 **Q. Has the company ever failed a water quality test since**
7 **you took over as operation's manager in December of**
8 **1990?**

9 A. No. We have consistently taken all of the required
10 samples in a timely manner, and all of these have
11 received passing grades.

12 **Q. A question has been raised regarding the need for a**
13 **second field assistant. Would you speak to this issue?**

14 A. Yes. When Gene hired me in 1990, he committed that if
15 I would work basically seven days per week with one
16 assistant until the major problems were solved, he
17 would provide for a second full time assistant as soon
18 as possible. The utility company has always had two
19 full time field assistants and a qualified Class "C"
20 operator, at least since I started in 1984. At that
21 time, the field assistants were myself and one other
22 man, and the Class "C" operator was Harry Braswell.
23 Now, we still have a Class "C" operator and two full
24 time assistants. The only difference is that the
25 company has me as a full time operator rather than

1 Harry Braswell as a part time operator. The job was
2 not being done with only a part time operator, but the
3 job is being done now. However, my first assistant and
4 I could not continue working and being on call 24 hours
5 per day seven days per week as we had done since 1990.
6 Last year I insisted to Gene Brown that we hire a new
7 full time assistant, and he agreed.

8 **Q. When did the need for another man come up?**

9 **A.** We have always needed an operator and two field
10 assistants, since I started in 1990 as well as when I
11 worked for the company between 1984 and 1988. Because
12 of the company's cash flow problems, my first assistant
13 and I agreed to work overtime and to be on call
14 practically all the time because we knew the company
15 could not afford a second man. The DEP testing
16 requirements take up more and more of my time. Also,
17 the work order, purchase order and other technical
18 bookkeeping requirements take a great deal more of my
19 time than before. The cross connection control
20 program, the ongoing system audit, the leak detection
21 program, updating the maps, the meter testing program,
22 and all of the other special operational and managerial
23 duties take all of my time. Because of this, it is
24 impossible for me to work in the field repairing leaks,
25 doing maintenance work, putting in connections, reading

1 meters, cutting off meters, and the other work that is
2 required by the field assistants. Because of the
3 nature of the work, there is a need for two field
4 assistants who work in coordination as a team. Also,
5 we do a great many of our own repairs and maintenance
6 work, which saves the company money, but it requires
7 the two full time assistants, one of whom has
8 substantial electrical knowledge and the other has
9 substantial carpentry knowledge. Both of them have
10 knowledge and experience in plumbing.

11 **Q. It has been suggested that the second field assistant**
12 **is only needed during the summer months, when the**
13 **island is so busy. Would you respond?**

14 **A.** Our engineering aerator analysis calls for extensive
15 flushing throughout the system on a daily basis. This
16 takes several hours per day, in addition to the growing
17 work required in connection with the cross connection
18 control program and other duties. This daily flushing
19 is even more important in the fall and winter months,
20 when the lines are not used as much, allowing a build
21 up of hydrogen sulfide. The winter months are when we
22 emphasize the repairs and maintenance to the system,
23 the meter testing program, updating the system maps,
24 and similar items in addition to the ongoing day to day
25 work. If we are to continue meeting the needs of our

1 customers, we must have two full time assistants in
2 addition to myself. The first assistant and I have
3 sacrificed since I was hired in 1990, but it is not
4 fair or reasonable to expect us to continue doing that
5 on an ongoing basis with no help. We deserve some time
6 off and this is not a 40 hour per week job. Somebody
7 has to oversee and maintain the system 24 hours per day
8 7 days per week, 365 days per year. When Mr. Brown
9 hired me, he promised me that I could have a two week
10 vacation every year and that I could take an additional
11 two weeks to for comp time. It is impossible for me
12 to take vacation time during the summer because of the
13 workload. Since I was hired in December 1990, I have
14 only been able to take a few days off. Hopefully, with
15 two full time field assistants I will be able to enjoy
16 the benefits that I have earned.

17
18 **Q. I understand you have a fax and copy machine on the**
19 **island. Is that necessary?**

20 **A. Yes, it definitely is. We have always needed a fax and**
21 **copy machine. They are used daily, and I could not do**
22 **without them.**

23
24
25

1 Q. A question has been raised about the travel allowance
2 provided to you and one of your field assistants.
3 Please tell us what you think about this.

4 A. I would not have bought a new 4-wheel drive truck, and
5 my first assistant would not have bought a 4-wheel
6 drive truck, if we had thought that there was any
7 question about the company's commitment to provide us
8 with a transportation allowance. We both constantly
9 use our 4-wheel drive trucks on an ongoing daily basis,
10 7 days per week, in order to properly operate and
11 maintain the water system on St. George Island. As
12 requested, I kept a log for a thirty day period from
13 5/18/94 through 6/18/94. A copy of the log is attached
14 as Exhibit "A." This log accurately reflects the miles
15 I put on my truck on a month-to-month basis. I
16 required my first assistant to also have a 4-wheel
17 drive truck as a condition of his employment, because
18 he has to use it throughout the day for water company
19 matters. I have always kept a daily log showing what
20 we all do, and this daily operating log shows that we
21 both use our trucks extensively 7 days per week for the
22 use and benefit of the water company. I pay for all of
23 my own gas, oil, insurance all maintenance expenses,
24 licenses, taxes, and all other expenses connected with
25 owning a motor vehicle. A 4-wheel drive truck is

1 required on St. George Island to maintain and operate
2 the water system which is also more expensive. Neither
3 my first assistant nor I could do out jobs without the
4 full time use of our 4-wheel drive trucks, and neither
5 of us can afford to contribute these trucks and all the
6 required expenses to the utility company unless we
7 continue to receive a transportation allowance.

8
9 **Q. Is the standard IRS or state mileage adequate on St.
10 George Island?**

11 **A.** No. There are a great many differences in the utility
12 company miles and the standard miles allowed on state
13 vehicles or for IRS purposes. The salt air on St.
14 George Island is very corrosive as well as the sand and
15 other adverse conditions on the island. This requires
16 higher maintenance, such as constantly repacking the
17 wheel bearings on the necessary 4-wheel drive vehicles.
18 Also, we have to stop and start at least 1,200 times
19 per month just in reading meters, as well as all of the
20 other frequent stops and starts in checking services,
21 doing repairs and all of our other work running around
22 the island. These trucks constantly have to carry
23 heavy objects including pipes, fittings, tools, the
24 backhoe, and other items which result in the trucks
25 being constantly banged up. Highway miles are much

1 easier on a vehicle than St. George Island miles on a
2 4-wheel drive truck. I believe the overall cost
3 allowance should be around \$.40 per mile considering
4 all of the direct and indirect cost in operating a 4-
5 wheel drive truck on St. George Island.

6
7 **Q. What about the pension plan, is this necessary?**

8 A. It was promised to me and the other employees as a part
9 of my employment, and I believe it is fair and
10 reasonable. I left a fully paid plan with extensive
11 retirement benefits at the City of Apalachicola, and it
12 is very difficult for this company to hire and keep
13 good employees unless we have pension and retirement
14 benefits like I and other employees could get working
15 for most other utility systems.

16
17 **Q. What about health and medical benefits?**

18 A. Earlier in my employment as operation's manager, the
19 company was paying my insurance directly at a cost of
20 approximately \$450 per month. The \$300 per month
21 allowance that I now receive is actually a reduction.
22 This insurance is very important to me and the other
23 employees on St. George Island. I do not believe the
24 company can maintain good employees without such
25 benefits.

1 Q. What about your recent pay raise, is it "excessive"?

2 A. No. When I started with the company in 1990, my base
3 salary was \$22,400 with health benefits of \$4,680 and
4 with a transportation allowance of \$10,400 for a total
5 compensation package of \$37,480. I did not think it
6 was realistic to press for any big raises or additional
7 compensation until the operational and service problems
8 of the water system on St. George Island were solved,
9 as Gene Brown and I agreed when I was hired. Although
10 my salary has been raised since 1990 to \$32,500, my
11 health benefits have been cut by \$1,080 back to \$3,600
12 per year, and my transportation benefits have been cut
13 by \$5,200 per year, back to a total of \$5,200 per year,
14 for a total compensation package of \$41,300 per year.
15 This is approximately a 10% increase between 1990 and
16 1994, which is only about 2-3% per year. This is not
17 "excessive."

18

19 Q. What will you do if your benefits are cut further, and
20 if your salary is not maintained?

21 A. Although I would hate to do so, I would have to look
22 for another job, which I would not have any trouble
23 finding based on my experience and the fact that I have
24 both a Class "C" operator's license in water and a
25 Class "C" operator's license in sewer. These services

1 are in demand, and I have a responsibility to myself
2 and to my family to be adequately paid for my services.
3 I feel that I have done everything that was asked of me
4 under difficult times and circumstances, and I deserve
5 to be fairly compensated.

6

7 **Q. In your opinion, is it necessary at this time for the**
8 **company to enter into a maintenance agreement regarding**
9 **both its ground storage tank and its elevated tank?**

10 **A. Yes. Definitely. The elevated tank is beginning to**
11 **corrode and rust. The ground storage tank is beginning**
12 **to show signs of leakage, and the almost 20 year old**
13 **roof needs repair and maintenance. In my opinion, it**
14 **would be foolish not to maintain both of these**
15 **facilities on an annual basis.**

16

17 **Q. Has this been done in the past?**

18 **A. Yes, we contracted for the drainage, cleaning and**
19 **maintenance of both tanks last year. The elevated tank**
20 **was under warranty until 1992. Since I started working**
21 **for the company in 1984, we periodically drained and**
22 **cleaned the ground storage tank as recommended by our**
23 **engineers and DEP.**

24

25

1 Q. Was the company negligent in not properly maintaining
2 the ground storage tank?

3 A. No, not in my opinion. We drained, inspected and
4 cleaned the tank on a periodic basis. The roof is
5 almost 20 years old, and I do not know what we could
6 have done to prevent its need for repair at this time.
7 I do not know what else we could or should have done to
8 properly maintain this facility. It is just an old
9 tank that needs to be properly sealed and maintained at
10 this time because of normal wear and tear.

11

12 Q. Would you compare the St. George Island water system
13 now with the way it was when you came back to work for
14 the company in December of 1990?

15 A. Yes, we now have a first class, safe and reliable
16 system, as compared to a fairly unreliable system when
17 I came back to work in 1990.

18

19 Q. How was this achieved?

20 A. When I came back to work for the company, Gene Brown
21 and I discussed the pressing need to make sure that the
22 system would have no more unplanned outages, which were
23 so common prior to my employment as a full time
24 operation's manager. Gene Brown told me that he wanted
25 to work toward complete redundancy throughout the

1 system. He often made the analogy with a twin engine
2 airplane, which can continue to fly even with one
3 engine out. With this goal in mind, we installed a
4 complete new dual chlorination system, which includes a
5 complete and equal backup system to allow the system to
6 continue operating automatically with full chlorine
7 residual even if there is a problem with one of the
8 system. We also installed complete backup alarm
9 systems to provide visual and audio advance notice
10 whenever any problem arises with the chlorination
11 system, the pumps, the water level in the tank or other
12 operational facilities. This is designed to give us
13 advanced notice and plenty of lead time to solve
14 problems before there is an outage. When I came to
15 work, there were plans on the drawing board for a new
16 250 gpm third well on the mainland. This new 250 gpm
17 well was planned by the company's engineers, and had
18 been approved by DEP and the PSC, which had mandated
19 its construction. However, when Gene Brown and I
20 started looking at the plans, we decided that this size
21 well would not meet our goal of complete redundancy
22 throughout the system. Wells 1 and 2 operating
23 together produce 500 gpm, and we wanted a third well
24 that could provide complete redundance and a complete
25 backup to meet or exceed this 500 gpm flow demand. We

1 therefore mandated a change in the well before it was
2 actually constructed to assure that it would produce at
3 least 500 gpm. This caused a slight delay in bringing
4 the well on line, but it was worth it. For example,
5 over the recent Memorial Day weekend, wells 1 and 2
6 operating together could not keep up with the demand.
7 I then manually switched over to well no. 3 until the
8 Memorial Day weekend demand went down, and well no. 3
9 was able to consistently keep up with the demand
10 without calling on our reserve storage on the island.
11 During this time, well no. 3 was pumping almost 600 gpm
12 on a consistent basis. This would not have been
13 possible with the original 250 gpm well permitted by
14 DEP and mandated by the PSC. We recently completed the
15 installation of a brand new 50 hp high efficiency pump
16 and motor together with another brand new replacement
17 50 hp high efficiency motor. To avoid the "water
18 hammer" problem, we also are installing variable speed
19 drives for both pumps. In addition to these two brand
20 new side-by-side high efficiency 50 hp pumps, we have
21 in reserve the old 50 hp pump and the old 20 hp pump,
22 both of which can be used in a dire emergency. This
23 now allows us complete redundancy in the pumping
24 system. In addition to these improvements, we have
25 installed a new butterfly valve and a new altitude

1 valve, together with the necessary piping
2 reconfiguration. These improvements will now allow us
3 to operate the system at substantially higher
4 pressures, and the variable speed drive systems will
5 allow these pressures to be maintained on a consistent
6 basis within 1 psi despite tremendous fluctuations in
7 demand, which we consistently have on St. George
8 Island. Our current intent is to operate the system at
9 a consistent 65 psi. None of these current
10 improvements, the butterfly valve, the altitude valve,
11 the two new pumps or the variable speed drive, were
12 mandated or required by PSC, DEP or anyone else. These
13 improvements are the result of numerous conversations
14 and a management decision by Gene Brown and me to "get
15 ahead of the curve" and to steadily upgrade and improve
16 the system for the benefit of customers on St. George
17 Island. We now have a safe and reliable system, but we
18 need adequate rates to maintain and operate the system.

19
20 **Q. Does that conclude your testimony?**

21 **A. Yes, it does.**
22
23
24
25

The most important thing a father can do for his children is to love their mother."

— REV. HESBURGH

JUNE						
S	M	T	W	T	F	S
			1	2	3	4
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12	13	14	15	16	17	18
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JULY						
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17	18	19	20	21	22	23
24	25	26	27	28	29	30

JUNE '94

13 MONDAY

43807
43910
103

THURSDAY 16

44129
44219
90

14 TUESDAY

Flag Day

43921
44018
87

FRIDAY 17

44227
44335
108

15 WEDNESDAY

~~44030~~
~~44107~~
~~77~~

44030
44107
77

SATURDAY 18

44349
44384
35

SUNDAY 19
Father's Day

JUNE '94

JUNE						
S	M	T	W	T	F	S
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JULY						
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"Thanks to the Interstate Highway System, it is now possible to travel across the country from coast to coast without seeing anything."
— CHARLES KURALT

6 MONDAY

Steve Baltzy
FRWA
43163
43371 11:00 AM
208

43470
43559
89

THURSDAY 9

7 TUESDAY

43376
43418
42

43569
43671
102

FRIDAY 10

8 WEDNESDAY

43427
43458
31

43701
43753
52

SATURDAY 11

43769
43790
21

SUNDAY 12

MAY '94

JUNE						
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JULY						
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"Blessed is the person who is too busy to worry in the daytime and too sleepy to worry at night."
 — LEO AIKMAN in Atlanta
 Journal-Constitution

30 MONDAY
 Memorial Day

Start 42734
 End 42801
 Driven 67

THURSDAY 2

~~Start 42945~~
 Start 42945
 End 43020
 Driven 75

31 TUESDAY

Start 42801
 End 42897
 Driven 86

FRIDAY 3

43020
 43078
 58

1 WEDNESDAY

Start 42903
 End 42940
 Driven 37

JUNE

SATURDAY 4

43080
 43123
 43

SUNDAY 5

43129
 43161
 38

"Good education is the essential foundation of a strong democracy."
— BARBARA BUSH

MAY						
S	M	T	W	T	F	S
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JUNE						
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MAY '94

23 MONDAY 42000

Victoria Day (Canada)

Phone # Assigned
927-3395

41992
42160
168

24 TUESDAY

42169
42230
61

25 WEDNESDAY

42241
42319
78

THURSDAY 26

Start 42349
End 42471
Driven 122

FRIDAY 27

42494
42571
~~42571~~ 77
Driven

SATURDAY 28

Start 42580
End 42668
Driven 88

SUNDAY 29

42680
End 42725
Driven 45