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STATE OF FLORIDA  
PUBLIC SERVICE COMMISSION

IN RE: )  
)  
Petition of SANLANDO UTILITIES )  
CORPORATION For A Limited )  
Proceeding to Implement Water )  
Conservation Plan In )  
Seminole County )  
\_\_\_\_\_ )

DOCKET NO.: 930256-WS  
FILED: March 10, 1993

ST. JOHNS RIVER WATER MANAGEMENT DISTRICT'S  
PREHEARING STATEMENT

ORIGINAL  
FILE COPY

COMES NOW St. Johns River Water Management District  
(District), by and through its undersigned attorneys, pursuant to  
Public Service Commission (PSC) Order Establishing Procedure dated  
March 30, 1994, and files its prehearing statement.

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1. The District intends to present the following expert  
witnesses at the hearing:

a. Christopher Lee Sweazy, Hydrogeologist. Mr. Sweazy  
will provide testimony concerning District policy in the areas of  
water conservation and reuse, and he will explain how these  
policies are applied in the consumptive use permitting context.  
Mr. Sweazy will also testify concerning the hydrogeologic and  
consumptive use permitting issues associated with implementation of  
the Sanlando Utilities Corporation (Sanlando) proposed water  
conservation plan.

b. Yaping Wang, Resource Economist. In his testimony,  
Mr. Wang will explain generally the effect an inverted rate  
structure has upon water consumption by a customer of a water

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utility company. He will also testify specifically about the effect the inverted rate structure proposed by Sanlando is expected to have on water consumption by its customers.

2. The District intends to offer the following exhibits into evidence at the hearing:

- a. Resume of Chris Sweazy;
- b. Resume of Yaping Wang;
- c. Consumptive Use Permit No. 2-117-0006UR for Sanlando Utilities;
- d. Consumptive Use Permit No. 2-095-0483UV issued to Prince Lake Wood Florida, Inc., for Sweetwater Country Club;
- e. Consumptive Use Permit No. 2-117-0227UV issued to Orlando Resort Corporation for Sabal Point Golf Course;
- f. Consumptive Use Permit No. 2-117-0220UV issued to Francis and Leola Bowman for Wekiva Golf Club.
- g. Southwest Florida Water Management District, Definition of Water Conservation Promoting Rates, prepared by Brown and Caldwell, February 1993.
- h. Southwest Florida Water Management District, Water Price Elasticity Study, prepared by Brown and Caldwell, August 1993.
- i. Southwest Florida Water Management District, Water Conservation Promoting Rate Structure Computer Model, User Manual, prepared by Brown and Caldwell, September 1993.
- j. List of Florida utilities which use an inverted rate structure.

Exhibits a, c, d, e and f will be sponsored by Chris Sweazy;

Exhibits b, g, h, i and j will be sponsored by Yaping Wang.

3. The basic position of the District in this matter is one of supporting Sanlando's petition to implement its water

conservation plan.

4. The District has identified the following fact issues in this case:

a. Is Sanlando's water conservation plan consistent with District policy? District position: yes; Chris Sweazy.

b. What quantity of water could be conserved if Sanlando's plan were implemented? 402 million gallons per year or 1.1 million gallons per day (this estimate is based on golf course use only); Chris Sweazy.

c. In general, what is the effect that an inverted rate structure has on water consumption by a customer of a water utility company? An inverted rate structure tends to discourage discretionary water use; Yaping Wang.

d. Are the proposed rates reasonable and in the public interest? Yes; Yaping Wang.

e. What effect will the inverted rate structure proposed by Sanlando have on water consumption by its customers? It is estimated that total water consumption would be reduced by 4.6 percent; Yaping Wang.

f. What is the District's policy concerning water conservation rate structures generally? Through the consumptive use permitting process, the District typically requires water utilities to implement water conservation rate structures as part of a water conservation plan; Chris Sweazy.

5. The District has identified the following issues of law in this proceeding:

a. Whether the 1994 Legislative changes to chapter 367, Fla.Stat. (chapter 94-243, Laws of Florida), apply to the matter which is the subject of this proceeding? District position: yes.

b. Whether the proposed rates are reasonable and in the public interest.

6. The District is unaware of any issues of policy in this case.

7. The District has identified the following as issues which are ripe for stipulation:

a. Water conservation and reuse are in the public interest.

b. Groundwater withdrawals will be reduced if the Sanlando plan is implemented.

c. The discharge of treated effluent to surface waters will be reduced if the Sanlando plan is implemented.

8. The District intends to file a motion in limine regarding the applicability of chapter 94-342, Laws of Florida, and a motion for official recognition prior to the final hearing in this case.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the original and fifteen (15) copies of the foregoing **ST. JOHNS RIVER WATER MANAGEMENT DISTRICT'S PREHEARING STATEMENT** were filed with the Division of Records and Reporting, Florida Public Service Commission, by Federal Express, and one (1) true and correct copy was forwarded by United States Mail this 24th day of August 1994, to the following parties of record:

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