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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for a Rate Increase)
in Seminole County by SANLANDO UTILITIES)
CORPORATION)

DOCKET NO. 93-0256-WS
Filed:
August 26, 1994

INTERVENORS' PREHEARING STATEMENT

COMES NOW, TRICIA A. MADDEN, as President of the WEKIVA HUNT CLUB COMMUNITY ASSOCIATION, INC., and Individually (hereinafter "Intervenors"), by and through their undersigned attorneys, pursuant to the provisions of Commission Rule 25-22.038(3), Florida Administrative Code, and the Commission's Order Establishing Procedure, issued March 30, 1994, and submit their prehearing statement.

A. All known witnesses

1. Tricia A. Madden shall support the Intervenors' position on all of the issues.

B. All known exhibits

1. None.

C. Statement of Basic Position:

The Sanlando Utilities Corporation (Sanlando) proposal should

ACK _____ not be approved as submitted. If the reuse facilities are deemed
AFA _____ necessary by the various appropriate governmental agencies, then
APP _____
CAF _____ the utility should fund its construction. The increase in the
CMU _____ company's rate base will permit the utility to recover its
CTR _____ investment over time from its ratepayers. Requiring the utility to
EAG _____
LEG D Sullivan make the investment is a more efficient and cost effective method
LIN 4 of financing and will help bring the utility into compliance with

SEC 1
WAS Kendell
OTH _____

Commission Rule 25-30.580, Florida Administrative Code.

D.-F. Combined Issues of Fact and Law and Positions:

ISSUE 1: If Sanlando builds the proposed reuse facilities will the three golf courses voluntarily use the facilities?

Intervenors' Position: There is no evidence indicating that the three golf courses will voluntarily use the reuse facilities if they are constructed.

ISSUE 2: Should the Commission be assured that the three golf courses will be required to use the reuse facilities before the Commission approves construction of the facilities?

Intervenors' Position: Yes. The Commission should not approve the construction of the Sanlando reuse facilities until it has received written assurance from the St. Johns River Water Management District (SJRWMD) that the three golf courses' consumptive use permits will not be renewed if the Sanlando reuse facilities are available.

ISSUE 3: Should the Commission approve Sanlando's petition to implement the water conservation plan?

Intervenors' Position: No. The Commission should not approve Sanlando's petition until it can be assured that the reuse facilities will be fully used, and not until the financing of the facilities can be more fairly and efficiently structured.

ISSUE 4: Should the Commission utilize Chapter 94-243, Laws of Florida (Section 367.0817, Florida Statutes) in its determination of this petition?

Intervenors' Position: No. Chapter 94-243, (Section 367.0817) cannot be retroactively applied.

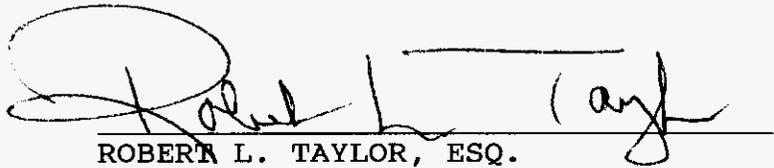
G. Proposed Stipulations: there are no stipulations pending at this time.

H. Pending Matters: There is an outstanding Motion for Leave to Intervene which has not been ruled on by the Commission.

I. Requirements that cannot be complied with: There are no

requirements of Order No. PSC-94-0375-PCO-WS that cannot be complied with at this time.

Respectfully submitted,



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CERTIFICATE OF SERVICE
DOCKET NO. 930256-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by United States Mail to the individuals listed on the attached Service List, this 26 day of August, 1994.

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