



#### BEFORE THE

#### FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 950495 - WS

#### APPLICATION FOR A GENERAL RATE INCREASE

VOLUME I BOOK 19 OF 22

MINIMUM FILING REQUIREMENTS
PREFILED DIRECT TESTIMONY

Containing WILLIAM (DAVE) DENNY

DOCUMENT NUMBER-DATE

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11	DIRECT TESTIMONY OF WILLIAM (DAVE) DENNY
12	BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
13	ON BEHALF OF
14	SOUTHERN STATES UTILITIES, INC.
15	DOCKET NO. 950495-WS
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1	Q.	WHAT IS YOUR NAME AND BUSINESS ADDRESS?
2	A.	My name is William (Dave) Denny and my business address is 1000
3	•	Color Place, Apopka, Florida 32703.
4	Q.	BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR
5		POSITION?
6	A.	I am employed by Southern States Utilities, Inc. (Southern States) as
7		General Manager - Operations. As General Manager - Operations, I am
8		a member of the Operations Team which participates on the capital
9		budget evaluation team and establishes Company operations' procedures
10		and policies for implementation at all of our facilities. I formerly was
11		employed by Deltona Utilities, Inc., which I will refer to as Deltona, at
12		the time it was acquired by Southern States. Therefore, I am familiar
13		with Company-wide operations decision-making and procedures both
14		prior to and since Southern States began operating the facilities formerly
15		owned by Deltona Utilities, Inc.
16	Q.	WHAT IS YOUR EDUCATIONAL BACKGROUND AND WORK
17		EXPERIENCE?
18	A.	I received an Associate in Arts degree from Clinch Valley College. I
19		have been involved in the water and wastewater industry since 1969. I
20		began in the industry with Deltona where I worked for 20 years,
21		ultimately as General Manager of Marco Island operations. From
22		March of 1991 to 1995, I was Regional Manager of operations for

1		Southern States' South Region. In 1995, I was promoted to my current
2		position as General Manager-Operations.
3	Q.	DO YOU BELONG TO ANY PROFESSIONAL
4		ORGANIZATIONS?
5	A.	Yes. I am a member of the South Florida Water Management District
6		Water Utility Advisory Committee, Florida Water Pollution Control
7		Operators Association, American Water Works Association, the South
8		Florida Water Management District Advisory Board on the Lower West
9		Coast Water Supply Plan and the Collier County Disaster Recovery
10		Team.
11	Q.	HAVE YOU EVER TESTIFIED BEFORE A REGULATORY
12		AGENCY?
13	A.	Yes. I have testified before the Florida Public Service Commission in
14		the past on behalf of Deltona Utilities, Inc., Lehigh Utilities, Inc. and
15		Southern States.
16	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
17		PROCEEDING?
18	A.	I will identify certain activities performed by or for field personnel
19		which indicate the functional interrelationship of SSU's facilities
20		statewide so as to provide safe, efficient and cost-effective service to
21		our customers. I also will provide information concerning customer
22		complaints to the Commission. I will identify certain portions of SSU's

1		plant in service additions budgeted for 1993 and projected for 1996.
2		Finally, I will describe a number of the reasons why Southern States'
3		operating costs have increased since rates last were authorized by the
4		Commission including additional costs relating to environmental laws
5		and rules changes, chemical cost increases and other reasons.
6	Q.	COULD YOU PROVIDE INFORMATION WHICH YOU
7		BELIEVE DEMONSTRATES THE FUNCTIONAL
8		RELATIONSHIP BETWEEN SOUTHERN STATES' LAND AND
9	,	FACILITIES THROUGHOUT FLORIDA?
10	Α.	The first significant fact is that at least one of every 8 hours worked by
11		field personnel is attributable to work across county boundaries. This
12		fact is demonstrated in Exhibit (WDD-1). The types of work
13		performed at facilities in multiple counties include regular operations,
14		maintenance and testing as well as responding to emergencies such as
15		line breaks, sinkholes, etc. with labor and required equipment. As
16		Exhibit (WDD-1) demonstrates, SSU services facilities in counties
17		where no field personnel at all are based. In these situations, SSU takes
18		full advantage of our economies of scale by having all operations,
19		maintenance and testing performed by personnel based in other counties.
20		As the Commission is aware, in March 1995 the Company
21		received Commission approval to provide water and wastewater service
22		in the Lakeside (Citrus County), Valencia Terrace (Lake County) and

Spring Gardens (Citrus County) service areas. Southern States did not hire any additional personnel to operate the facilities serving these areas and no employees came with the acquisitions. The Company could only accomplish this by using Southern States' existing equipment, materials, supplies and personnel to operate these facilities - thus creating additional economies of scale for our customers. In a similar fashion, during emergencies both personnel and equipment are dispatched from areas all over the state to resolve the situation as quickly and effectively as possible, as confirmed in the testimony of SSU Vice President - Operations, Raymond Gagnon. A recent example occurred on Thursday night, March 9, 1995, when the 30 inch raw water supply line located under the Marco River ruptured. This presented us with a very serious situation. Only one of the island's two water treatment plants remained operational, creating a service strain on stored and accessible water supplies. By 7:00 a.m. on March 10 a contractor was on site in addition to our personnel. Divers went into the water to determine the exact cause and extent of the rupture. Concurrently, contact was being made with personnel in Apopka to advise them of the situation as well as having other personnel around the state made ready to expedite shipment of materials or equipment to Marco. SSU's operations personnel optimized remaining water plant flow and assisted with the repairs. The environmental permitting staff

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in Apopka notified regulatory authorities and obtained necessary permits. Following door-to-door contacts by Marco employees, plus radio and TV alerts, water consumption on the island dropped dramatically, averting potential depletion of the system. Broadcast messages and SSU Customer Service personnel kept the customers informed until normal service was restored within 24 hours. Scott Vierima (SSU's Interim President) and Tracy Smith (Manager of Government Relations) also came to Marco Island during the repairs to be of assistance and to maintain on-going communication with the media.

Another example of the benefits of the functional relationships between SSU facilities is the services provided by Mr. George Hildreth, a welder based at our Spring Hill office in Hernando County. When an acid leak was discovered in a sulfuric acid storage tank located at our Lehigh plant in Lee County, Mr. Hildreth responded immediately to assist in the containment and correction of the problem. Our customer service and customer relations staff at Lehigh and in Apopka also were informed of the event and took immediate steps to inform customers of the facts and provide the necessary temporary relocation of some customers until their complete safety was assured. Due to the soundness of our leak containment facilities and the prompt and effective response of these and other employees, the emergency was

handled without further incident. But for SSU's size and the ready availability of experienced personnel in the various departments from across the state to provide the necessary assistance, it is doubtful that SSU's response to emergencies like these could have been so prompt or effective.

Similarly, when our Lehigh water system experienced high trihalomethane levels, SSU was able to respond with personnel experienced in the methods of handling this problem. We also were able to resolve the problem in the quickest manner possible by transporting ammoniation equipment from the Marco Island plant in Collier County to Lehigh in Lee County. Thus, SSU did not have to wait until the equipment could be ordered and delivered by a manufacturer.

I would like to be clear that operations (field) personnel perform duties across county boundaries on a daily basis. For example, I currently am performing the duties of the central region manager as well as serving as General Manager-Operations. Together with the area supervisors, I coordinate various assignments and projects involving facilities located in different counties. Since corporate headquarters and the central region office are both located in Apopka, Apopka is the hub of a great deal of activity for service areas in Orange, Lake, Osceola, Martin, St. Lucie, Volusia, Brevard and Seminole Counties. Some 16

central region maintenance personnel are based in Apopka and provide service to all central region service areas. Operations personnel including operators and maintenance technicians in Lake, Orange, Osceola, and Seminole Counties are all within radio contact from the dispatch station in the Apopka customer service office. The backflow/cross-connection prevention program for all central region service areas is administered by one person based in Apopka. Meetings and training sessions for central region operations personnel are often held in Apopka. These cross-county activities are typical of the activities carried out in SSU's other regions.

In addition to the cross county labor activities within regions, SSU operations personnel also provide services and share equipment between regions, thus, also being shared across county boundaries. This inter-region labor and equipment sharing includes sharing necessary to install new services which require a jack and bore; install electrical equipment and repair such equipment; haul effluent to contracted disposal sites with tanker trucks; maximize use of pump trucks for various needs; maximize use of employees with specialized skills such as welding; and other sharing of equipment and personnel as may be necessary to ensure high quality service to our customers.

Additional economies from our cross-county service include dispensation received by SSU from the Department of Environmental

Protection to satisfy certain equipment/safety requirements, which would require equipment at each facility, to be satisfied by maintaining the equipment in SSU's trucks which service numerous systems.

A.

All of the activities I have described are similar to the activities which are performed and which are required for the proper operation and maintenance of SSU's facilities in all of SSU's four regions so as to save SSU and our customers money. We believe these facts reflect how SSU's water and wastewater services are functionally related so as to cross county boundaries.

### Q. COULD YOU BRIEFLY DESCRIBE THE ORGANIZATION STRUCTURE OF THE OPERATIONS DEPARTMENT?

Yes. The Operations Department is led by the operations team consisting of SSU's Vice President - Operations, three Regional Managers and the General Manager of Operations.

The "operations team," which meets monthly in Apopka, coordinates the following operations activities for all SSU regions: backflow-cross connection prevention, meter change-out programs, lab procedures, capital budgets, operations and maintenance budgets, operator training, compliance with and changes to regulatory rules and regulations, customer complaints, company policies and procedures, plant inspections, and regulatory permit compliance. Also, members of the team will accompany key personnel from other areas of the

company to meet with the various Water Management Districts, the Department of Environmental Protection, County Health Departments, County officials, and other regulatory bodies to discuss plant inspections, budgets, environmental issues, etc.

A.

Every regional manager is responsible for water and wastewater service areas located in more than one county. Thirteen area supervisors assist the regional managers in supervising SSU's approximately 150 service areas (regardless of whether a service area currently is regulated by the Florida Public Service Commission). I have attached listings of the area supervisors who serve under each regional manager (as well as the areas which they supervise) and the base of operations and service areas served by plant operators and maintenance technicians as Exhibit \_\_\_\_ (WDD-2). This exhibit shows that 9 out of the 13 area supervisors are responsible for water and wastewater facilities located in more than one county.

## Q. COULD YOU GENERALLY DESCRIBE THE DUTIES AND ACTIVITIES OF THE REGIONAL MANAGERS AND AREA SUPERVISORS?

Yes. The Regional Manager's office provides both administrative and operational support services for all facilities in the region including, but not limited to the coordination and distribution of equipment, labor and supplies and the collection of data for the preparation of various reports

to SSU's headquarters in Apopka as well as to regulatory and governmental agencies. In order to properly fulfill their responsibilities, each regional manager regularly travels to the various service areas within the region for meetings, site inspections, problem solving, etc., and to Apopka for meetings of the operations team, budget evaluation team and other activities.

Generally, area supervisors are responsible for the following: (1) ensuring the proper operation and maintenance of the area's land and facilities on a day to day basis; (2) acting as immediate supervisor of the operations personnel (i.e., ensuring compliance with SSU policies and procedures, communicating to employees those policies and procedures, etc.); (3) ensuring that the operations personnel properly operate SSU facilities and fulfill their other duties; (4) accompanying operations personnel on regular plant inspections; and (5) ensuring the proper distribution of labor, equipment and supplies. Like regional managers, in order to properly fulfill their duties, area supervisors regularly must travel to each of the service areas for which they are responsible.

- Q. COULD YOU GENERALLY DESCRIBE THE DUTIES AND
  ACTIVITIES OF THE OTHER MEMBERS OF WHAT YOU
  HAVE CALLED THE OPERATIONS TEAM?
- A. As General Manager of Operations, I act as a sort of trouble-shooter on

a statewide basis. At times, I can be found in a different county each day of the week. I provide support in areas such as meter programs, control systems, backflow/cross-connection control, etc. Budgets and cost control is the responsibility of the entire team. As General Manager, I also am a member of the capital budget evaluation team. My staff and I are located in Apopka in Orange County.

As explained by SSU witness Raphael A. Terrero, the regional managers and area supervisors also receive technical and support services necessary for operating and maintaining SSU's water and wastewater facilities statewide from various other Apopka-based groups, i.e., the Engineering and Planning Department, the Permitting and Environmental Compliance Department, and several senior operations personnel based in Apopka.

- Q. DO YOU HAVE ANY ADDITIONAL COMMENTS REGARDING SOUTHERN STATES' OPERATION OF ONE UTILITY "SYSTEM"?
- 17 A. In Docket No. 930945-WS, County witnesses suggested that the service
  18 provided by SSU's land and facilities which lie exclusively within a
  19 particular county's boundaries do not cross county boundaries and that
  20 such service is rendered "independent" of SSU's other land and
  21 facilities. Although the physical assets may not cross county
  22 boundaries, it is necessary to point out that the physical assets, standing

alone, are incapable of providing utility service to SSU's customers. There are many services and activities of an operational as well as administrative nature which occur between SSU's land and facilities located outside of Apopka. These services include the actual operation and maintenance of facilities in multiple counties by the same field personnel, the use of chemicals at various facilities which are bought in bulk through Apopka and may be stored at designated sites for distribution to multiple facilities, the installation of meters and lines by personnel who perform this function in multiple counties, etc. These activities are in addition to the managerial, administrative and training services provided by each of the operations team members, such as myself, which in every instance are provided to land and facilities in more than one county.

In addition to regional managers, SSU has thirteen (13) area supervisors who are the front line managers, administrators and trainers of SSU's field personnel. Nine (9) of SSU's thirteen (13) area supervisors provide these services to systems in more than one county.

Plant operations included as "cross county" labor include, but are not limited to, maintenance and repair, line replacements and extensions, backflow and cross connection prevention and corrections, meter installations and change outs, fire hydrant flushing and maintenance, electrical work, welding, equipment and site maintenance, installation of

chlorine loss alarms, lift station maintenance and emergency assistance.

In addition to these labor related facts, it should be understood that SSU shares equipment between plants located across county boundaries ranging from the wrench to repair the pumps, lawn mowers to cut the lawns, sampling equipment for quality testing, breathing apparatus for employee safety right up to major pieces of treatment equipment such as ammoniation equipment and the cars and trucks to transport all personnel and equipment.

Also, SSU not only purchases materials and supplies such as chemicals in bulk, but supplies like chemicals, meters and parts are delivered to and/or stored and distributed from designated drop-off plants. For example, all chemicals used for SSU's Hillsborough and Pasco County facilities are delivered, stored and distributed from the Seaboard plant located in Hillsborough County. Similarly, the Lake Gibson Estates (Polk County) facilities serve as the storage facility for sampling equipment, supplies and forms for our Zephyr Shores (Pasco County) facility. These activities are all operational in character.

Additional activities which occur between facilities outside of Apopka include: (1) the monthly meetings between the regional managers and SSU's Vice President-Operations in which every facet of operations and management are discussed; (2) an additional monthly meeting held among the regional managers (without SSU's Vice-

President-Operations) for information sharing (such as new or unique permit requirements, or new solutions discovered to old problems, etc.), budget consideration and other operations and management related discussions; (3) bi-weekly meetings between regional managers and their respective area supervisors; (4) quarterly managers meetings attended by all SSU managers to discuss all topics relating to utility service, periodic safety, permit familiarization and (5) training meetings, as discussed further by SSU witness Terrero, which may include Apopka personnel from the Environmental Compliance and Permitting ("ECPD"), legal and engineering departments, regional mangers, area supervisors, operators and maintenance personnel. No SSU facility could operate without these activities and services which take place between our facilities and the managers and other personnel necessary to permit, design, operate and maintain them. Q. COULD YOU EXPLAIN WHAT IS PRESENTED IN EXHIBIT (WDD-3)? A. Exhibit (WDD-3) contains a copy of a schedule issued by the Commission which identifies the complaints received by the Commission from customers served by the utilities regulated by the Commission during 1994. This schedule indicates that during 1994, the Commission received 77 complaints from Southern States' customers, of

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which only 25% were justified. I also note that (1) only 36 of the total

77 complaints were related to quality of service as opposed to billing, etc. and (2) the number of complaints made to the Commission in 1994 was 11% lower than the complaints made to the Commission in 1993.

Q.

A.

Also, through April of 1995, Southern States has reduced the number of complaints we have received directly from our customers by more than 11% from the same period in 1994. We believe these are valid representations of the fact that Southern States is providing high quality service to our customers.

# COULD YOU PLEASE IDENTIFY SOUTHERN STATES' BUDGETED 1995 AND PROJECTED 1996 RENEWAL AND REPLACEMENT PLANT IN SERVICE ADDITIONS FOR WATER AND WASTEWATER FACILITIES?

The 1995 budget includes approximately \$540,000 in water and wastewater renewal and replacement facilities. The purpose for these investments are to provide a source of funds for unanticipated emergency repairs and/or equipment/facility replacements or additions. Historically, unanticipated expenditures are experienced during the course of the year due to various reasons such as: (1) aged equipment wearing out (pumps, motors, blowers, etc.); (2) failures due to power interruptions, lightning, wind damage, etc.; (3) regulatory agencies (FDEP, county governmental unit, etc.) requesting system modifications; and (4) internally generated requirements resulting from loss

prevention/risk management inspections and technical service evaluation reports.

Q.

Failure to provide funds to handle unanticipated requirements can result in one or more of the following: (1) operating permit violation; (2) regulatory consent order, notice of violation, warning letter and/or fines; (3) disruption of service resulting in poor customer relations; (4) placing employees and possibly general public safety at risk; and (5) environmental compliance at risk.

I believe that these projections for such unanticipated additions are reasonable based on current needs and past experience. The 1992, 1993 and 1994 renewal and replacement facilities budgets were \$714,056, \$494,098 and \$467,624, respectively. For 1996, we projected \$535,500 of renewal and replacement facilities also based on an assessment of these past experiences and current needs.

- COULD YOU PLEASE IDENTIFY SOUTHERN STATES'
  BUDGETED 1995 AND PROJECTED 1996 INVESTMENT IN
  METER INSTALLATIONS AND REPLACEMENTS AND THE
  BASIS FOR THE COMPANY'S PROJECTIONS?
- A. Yes. For 1995, we budgeted \$698,973 based on our meter replacement program which provides for 7% of meters to be replaced and 3.5% increase in meters for growth. For 1996, our projected budget for meters is \$699,720 which provides for 8% of meters to be replaced and

1		for growth. An additional \$238,000 was projected in 1996 to
2		accommodate our large meter retrofit program. The meter replacement
3		and large meter retrofit programs are designed to improve meter
4		accuracy and thus reduce customer complaints as well as unaccounted
5		for water situations.
6	Q.	COULD YOU PLEASE IDENTIFY SOUTHERN STATES'
7		BUDGETED 1995 AND PROJECTED 1996 INVESTMENT IN
8		WATER SERVICE INSTALLATIONS?
9	A.	Yes. For 1995, we budgeted \$485,935 for water service installations.
10		This includes materials needed to provide the service line from the
11		water main up to, but not including, the meter. The 1995 budget is
12		based on an anticipated growth rate of 3.5% in those areas where
13		service line installations are required. For 1996, we projected \$499,800
14		for the water service installations in a similar manner.
15	Q.	DOES THAT CONCLUDE YOUR TESTIMONY?
16	A.	Yes, it does.

Southern States Utilities, Inc.\
Analysis of In-County and Cross-County Labor
Year-Ended December 31, 1994

: 10 time:

% Dollars; Hours: % Outside Outside Outside In-In-Outside Totals County County County County Totals County County County 10,635 10,635 100.0% 1,036 1,036 100,0% Bradford 100.0% 3,430 3,430 263 100.0% Brevard 263 20.1% 136,021 34,149 170,171 14,854 16.6% Charlotte 12,390 2,465 44,138 50.0% 1,630 6.9% 22,069 22,069 Citrus 22,028 23,658 12.6% 35,887 4,521 2,962 326 3,288 9.9% 31,366 Clay 6.4% 733,705 5.1% 687,015 46,690 Collier 60,250 3,247 63,497 7.4% 287,797 266,496 21,301 23,845 5.5% Duva! 1,384 25,229 376,794 2.7% 366,507 10,287 1.9% Hernando 34,593 655 35,248 100.0% 5,916 5,916 564 564 100.0% -Highlands 24.5% 95,712 8,161 19.8% 72,283 23,429 Hillsborough 6,544 1,617 49.6% 77,800 156,989 79,189 Lake 7,456 7,915 15,371 51.5% 10.4% 465,900 8.9% 417,637 48,263 3,722 41,934 Lee 38,213 3,874 187,138 2.1% 183,264 17,892 296 18,188 1.6% Marion 8.5% 6.7% 58,324 5,409 63,733 Martin 5,095 366 5,461 1.2% 0.9% 132,842 1,617 134,459 104 11,596 Nassau 11,492 246,836 5.9% 14,472 21,318 1,069 22,387 4.8% 232,364 Orange 44.1% 38,636 87,598 48,962 4,222 3,856 8,077 47.7% Osceola 37.9% 39.1% 44,137 26,908 71,045 Pasco 3,691 2,370 6,061 50,799 6.2% 47,631 3,168 5.0% 4,732 248 4,979 Polk 77,918 3,715 81,634 4.6% 7,442 260 7,702 3.4% Putnam 52.7% 92,943 103,494 196,437 17,433 57.6% Seminole 7,384 10,049 9,271 100.0% 657 100.0% 9,271 657 St. Johns 100.0% 11,760 11,760 St. Lucie 1,041 1,041 100.0% 719,379 7.9% 56,615 6.0% 662,764 Volusia 61,706 3,952 65,657 0.0% 43,928 43,928 3,756 3,756 0.0% Washington 13.7% 12.1% 3,703,661 587,429 4,291,090 357,009 49,087 406,096 Totals

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STREET, STREET

6/6/95

Area Supervisor	Service Areas Responsible For	Region
Rick Eck	All Orange County service areas except Holiday Heights and Westmont; Chuluota (Seminole County); all Martin, St. Lucie, and Osceola County service areas	Central
Donald Corder	All Seminole County service areas except Chuluota, Holiday Heights & Westmont (Orange County)	Central
Brian Heath	All Lake County service areas except Holiday Haven	Central
Douglas Lovell	All Volusia County service areas except Jungle Den and all Brevard County service areas	Central
Gene Manning	All St. Johns and Duval County service areas	North
Jerry Wright	Amelia Island (Nassau County)	North
Joe Roberts <sup>1</sup>	All Putnam, Bradford, and Clay County service areas	North
Michael Quigley	Marco Island & Marco Shores (Collier County)	South
Wayne Vowell	Brunt Store (Charlotte/Lee Counties), Deep Creek (Charlotte County), Leisure Lakes (Highlands County)	South
Tom Pound	Lehigh (Lee County)	South
Frank Sanderson <sup>2</sup>	All Citrus County service areas except Sugarmill Woods	West
William Yocum	All Marion County service areas, Holiday Haven (Lake County), and Jungle Den (Volusia County)	West
Dennis Fuller	Zephyr Shores (Pasco County), all Polk and Hillsborough County service areas	West
Joe Mack	Spring Hill (Hernando County), Palm Terrace (Pasco County), Sugarmill Woods (Citrus County)	West
Harold Register	Sunny Hills (Washington County)	West

<sup>&</sup>lt;sup>1</sup> Joe Roberts is north region manager. In the north region, there is no area supervisor for the Putnam, Clay, and Bradford County service areas, so the lead operators for those service areas report directly to the regional manager.

<sup>&</sup>lt;sup>2</sup> Frank Sanderson is west region manager and acts as area supervisor as indicated.

EXHIBIT		(WDD-2)
PAGE	2_of	3

#### Operations Personnel And Areas Of Responsibility - General

Non-supervisory operations personnel fall into two basic categories: plant operators and maintenance technicians. Depending on where a plant operator is based, he or she may have to do more than just operate and maintain the water or wastewater plant(s). Some plant operators perform tasks normally performed by maintenance technicians in other service areas, e.g. hookups, fixing line breaks, line flushing, lift station maintenance, meter reading, collections visits, etc.

Generally, the operations personnel in each region have responsibility for one or more designated service locations. One operator or a group of operations personnel may be responsible for one service area or more than a dozen service areas, depending on factors such as the number of customers, type of facilities, and distance between service areas. The following charges illustrate this arrangement.

#### Operator/Maint. Tech.'s

#### Base of Operations Service Area(s) Covered Central Region University Shores (Orange County) University Shores, Chuluota (Seminole County) Leilani Heights All Martin County service areas and Tropical Isles (St. Lucie County) The Fountains (Osceola County) All Osceola County service areas, Daetwyler Shores & Lake Conway (Orange County) Apopka<sup>3</sup> (Orange County) Holiday Heights & Westmont (Orange County), all Seminole County service areas except Chuluota All Lake County service areas except Holiday Haven Sunshine Parkway (Lake County) Deltona (Volusia County) Deltona Sugar Mill (Volusia County) Sugar Mill, Oakwood & Kingswood (Brevard County) North Region Woodmere (Duval County) Woodmere Keystone Heights (Clay County) All Clay and Bradford County service areas Satsuma<sup>4</sup> (Putnam County) All Putnam County service areas

<sup>&</sup>lt;sup>3</sup> The operators who run the plants in the service areas designated are based in Apopka. However, Apopka is also the base of operations for some 16 maintenance personnel who provide service in all central region service areas, although in Orange, Osceola, Lake, and Seminole Counties predominately.

Operator/Maint. Tech.'s

#### Base of Operations

South Region

Marco Island (Collier County)

Lehigh (Lee County)

Burnt Store (Charlotte/Lee Counties)

Deep Creek (Charlotte County)

West Region

Citrus Springs (Citrus County)

Lake Gibson Estates (Polk County)

Marion Oaks (Marion County)

Palm Terrace (Pasco County)

Seaboard (Hillsborough County)

Spring Hill (Hernando County)
Sunny Hills (Washington County)

Sugarmill Woods (Citrus County)

#### Service Area(s) Covered

Marco Island & Marco Shores

Lehigh, Leisure Lakes (Highlands County)5

Burnt Store

Deep Creek

•

All Citrus County service areas except Sugarmill Woods

All Polk county service areas and Zephyr Shores (Pasco

County)

All Marion County service areas, Holiday Haven (Lake

County), and Jungle Den (Volusia County)

Palm Terrace

All Hillsborough County service areas

Spring Hill

- - - - - -

Sunny Hills

Sugarmill Woods

Note: The above charts show operations personnel based in SSU field offices.

<sup>&</sup>lt;sup>4</sup> Satsuma is a town a few miles south of Palatka in Putnam County. SSU does not have any service areas in Satsuma, but has several service areas near it.

<sup>&</sup>lt;sup>5</sup> A contract operator runs the Leisure Lakes plant. However, operations personnel travel from Lehigh and Burnt Store to Leisure Lakes regularly, and the area supervisor based in Burnt Store is responsible for operations in Leisure Lakes.

#### DIVISION OF CONSUMER AFFAIRS COMPLAINT ACTIVITY

 $f(\chi) = \{f, f'\}_{1 \leq i \leq n}$ 

Water & Wastewater Industry

					× .	Justific	cation F	or Cases	Received	and Closed
				% Change					Percent	% Late
Company	Service	Billing	Total	From 1993	Major Type	Yes	No	Some	Justified	Responses
P. Utilider	1	i ii ii	2	111111111111111111111111111111111111111	Miscellaricoux (2)	011	2	0 11	0%	.50
irport Road Development	1	1	2	100%	Miscellaneous (2)	1	0	1	50 %	0
loba Utilities, Inc.	01/11/11/11/1	18	11128	11 -43%	Нigh BШ(8)		19	1111112	111111356	42
eauclerc Utilities	3	0	3	H Microsoft (1992)	Sewage (3)	2	0	1	67 %	33
elmar Utilities	111111111111111111111111111111111111111	Manus of the	014115	100%	Miscellaneous Billing (2)		11111/2	0	0%	1111111150
roadview Park Water	(8444444444444444444444444444444444444	mmmmm F	4	-56%	High Bill (2)	0	2	1	0%	33
S. Water Company	300887	CHUMINS	amin		Rusiness Office Problem			ilillii o	1111110%	
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EXHIBIT

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