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**REBUTTAL TESTIMONY OF BRUCE ADAMS
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
ON BEHALF OF
SOUTHERN STATES UTILITIES, INC.
DOCKET NO. 950495-WS**

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FPSC-RECORDS/REPORTING

1 Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

2 A. My name is Bruce Adams. My Business address is 301
3 Gun Club Road, West Palm Beach, Florida, 33406.

4 Q. WHO IS YOUR CURRENT EMPLOYER AND WHAT IS YOUR
5 POSITION?

6 A. I am the Conservation Coordinator for the South
7 Florida Water Management District ("SFWMD").

8 Q. COULD YOU PLEASE DESCRIBE YOUR BACKGROUND AND
9 EXPERIENCE?

10 A. I received both my Bachelor's and Master's degrees
11 in Communications from the Florida State
12 University, specializing in government,
13 organizational communications and conflict
14 resolution. For the past eighteen years I have
15 been responsible for the creation, development and
16 management of the District's water conservation
17 program. I am on the adjunct faculty of Florida
18 Atlantic University where I developed and teach the
19 University's Water Conservation/ Xeriscape
20 curriculum. I am Past President of both the
21 Florida Water Wise Council, Inc. and the National
22 Xeriscape Council, Inc. I am a founding member of
23 the American Water Works Association's Water
24 Conservation Committee, and have served on the
25 AWWA's Reuse and Leak Detection committees, as well

1 as having served as a Director of the Florida
2 Section/AWWA.

3 I have testified before the Florida
4 Legislature and the United States Senate on water
5 conservation matters.

6 **Q. WOULD YOU PLEASE DESCRIBE YOUR PRESENT DUTIES AS**
7 **CONSERVATION COORDINATOR.**

8 A. I serve as the District's Program Manager for both
9 water conservation and water shortage management.
10 In this position I report to both Executive
11 management and the Governing Board on matters of
12 water conservation and water shortage management.
13 I am responsible for the District's Mobile
14 Irrigation Evaluation Laboratory contract with the
15 USDA/NRCS, the Florida Rural Water Assoc., Leak
16 Detection contract, and the District's Memorandum
17 of Understanding on water conservation with the
18 Florida Public Service Commission. Additionally, I
19 manage the Water Conservation Campaign contract
20 between the State's Water Management Districts.
21 This project includes all of the WMD's efforts at
22 water conservation education, advertising, and
23 public opinion research.

24 I coordinate water conservation program
25 development with local governments, water

1 utilities, and water users.

2 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

3 A. The purpose of my testimony is to add, what I
4 believe is pertinent information, in the matter of
5 conservation programming and Southern States
6 Utilities, which is before this Commission. I
7 recommend that the PSC consider allowing investor
8 owned water utilities to recover full costs for
9 their conservation programs. Also, I wish to
10 respond to certain portions of the Testimony of Kim
11 Dismukes filed on behalf of the Office of Public
12 Counsel regarding components of SSU's proposed
13 water conservation program.

14 **Q. ARE THERE ANY SPECIFIC SFWMD RULES THAT REQUIRE**
15 **UTILITIES TO IMPLEMENT CONSERVATION MEASURES?**

16 A. Yes, in SFWMD's "Basis of Review for Water Use
17 Permit Applications", page A-26, public water
18 suppliers are required to implement a water
19 conservation program, which includes, at a minimum:

20 A daytime irrigation restriction, (10:00 A.M.-
21 4:00 P.M.)

22 A water conservation based rate structure

23 An Ultra-Low Flow Plumbing Code

24 A Xeriscape landscape ordinance

25 A leak detection program

- 1 A water conservation public education program
- 2 A rain switch ordinance
- 3 A reclaimed water reuse feasibility analysis
- 4 for the service area

5 Since SSU is not a local government utility,
6 it is recognized that they are unable to enact the
7 ordinance elements of the permit requirements.
8 Therefore, the intent of the permit requirements
9 for investor owned utilities is to design a program
10 for their service area which would best assist the
11 local government in implementing water
12 conservation.

13 **Q. HAVE YOU REVIEWED SSU'S WATER CONSERVATION PROGRAM**
14 **ENHANCEMENTS AS PROPOSED IN THIS RATE CASE?**

15 A. Yes.

16 **Q. DOES SFWMD SUPPORT SSU'S PROPOSED CONSERVATION**
17 **PROGRAM ENHANCEMENTS?**

18 A. Yes. I believe that the water conservation program
19 elements are in the best interests of the customers
20 of SSU and represent a mix of water conservation
21 program techniques which have the potential for
22 meeting the goals of the SFWMD. Successful water
23 conservation programs include a broad mix of
24 techniques which include public relations,
25 advertising, marketing, auditing and conservation

1 hardware. In my opinion, programs based solely on
2 public relations are not effective. Conversely,
3 conservation programs that do not include public
4 relations are often equally as ineffective.

5 **Q. DO YOU HAVE ANY INFORMATION REGARDING THE BENEFITS**
6 **OR THE EFFECTIVENESS OF SIMILAR CONSERVATION**
7 **PROGRAMS?**

8 A. My review of SSU's proposed water conservation
9 program elements indicates that the techniques are
10 consistent with program efforts of both the SFWMD
11 and of water utilities throughout the state and
12 Nation. The anticipated results of SSU's program
13 are consistent with the anticipated and actual
14 results of many programs throughout the Nation. In
15 my opinion, each utility must design a water
16 conservation program which is unique to the factors
17 and needs of its service area. Comparison of
18 techniques and goals with other programs can, at
19 best, set the stage for a utility's proper program
20 design.

21 **Q. WHAT IS YOUR OPINION REGARDING KIM DISMUKES**
22 **TESTIMONY THAT SSU'S CONSERVATION COST OF \$20,000**
23 **FOR THE MARCO ISLAND WATER AUDITS SHOULD NOT BE**
24 **ALLOWED?**

25 A. The SFWMD supports and encourages water suppliers

1 to join in cooperative partnerships with water
2 users, local, state and Federal agencies on
3 conservation projects such as water audits. The
4 SFWMD participates in these water audits as part of
5 our water conservation program. For FY 1996, the
6 SFWMD has allocated over \$ 350,000 for water
7 auditing. I believe that a water audit project for
8 Marco Island, because of the nature of high water
9 demands and scarce resources, is indicated and
10 proper.

11 **Q. WHAT IS YOUR OPINION REGARDING KIM DISMUKES**
12 **SUGGESTION THAT IRRIGATION SHUT-OFF DEVICES ARE NOT**
13 **EFFECTIVE?**

14 A. I am one of the State's leading proponents of the
15 use of rain switches for the control of automatic
16 landscape irrigation systems. I assisted the
17 Florida Legislature by requesting that the rain
18 switch requirement be added to the Xeriscape
19 Landscaping Law in 1991. It is my opinion, based
20 upon personal use and knowledge, and by
21 overwhelming and unsolicited anecdotal evidence,
22 that when properly installed, maintained and
23 operated- rain switches are an effective technique
24 for demand management.

25 **Q. DOES THAT CONCLUDE YOUR PRE-FILED TESTIMONY?**

1 A. Yes, it does.