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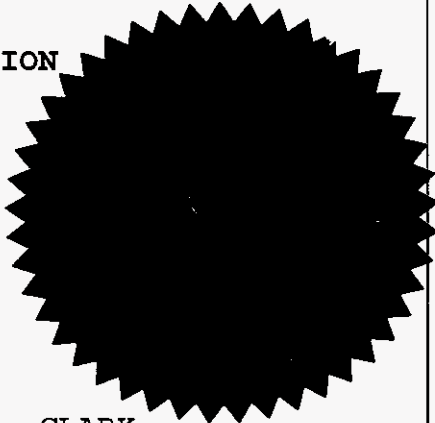
BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of : DOCKET NO.  
:   
Application for a rate increase and : 950495-WS  
increase in service availability charges :  
By SOUTHERN STATES UTILITIES, INC., for :  
Orange-Osceola Utilities, Inc., in :  
Osceola County, and in Bradford, Brevard, :  
Charlotte, Citrus, Clay, Collier, Duval, :  
Highlands, Lake, Lee, Marion, Martin, :  
Nassau, Orange, Osceola, Pasco, Putnam, :  
Seminole, St. Johns, St. Lucie, Volusia, :  
and Washington Counties. :  
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FIRST DAY - LATE EVENING SESSION

VOLUME 5

Pages 509 through 554



PROCEEDINGS: HEARING  
  
BEFORE: CHAIRMAN SUSAN F. CLARK  
COMMISSIONER J. TERRY DEASON  
COMMISSIONER JULIA L. JOHNSON  
COMMISSIONER DIANE K. KIESLING  
COMMISSIONER JOE GARCIA  
  
DATE: April 29, 1996  
  
TIME: Commenced at 7:00 p.m.  
  
PLACE: Betty Easley Conference Center  
Room 148  
4075 Esplanade Way  
Tallahassee, Florida  
  
REPORTED BY: PEGGY L. OWENS, RMR, RPR  
  
APPEARANCES:  
  
(As heretofore noted.)

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**WITNESSES**

**NAME**

**PAGE NO.**

RAFAEL A. TERRERO

Cross Examination by Mr. Pelligrini      512  
Redirect Examination by Mr. Feil      535

## EXHIBITS

NUMBER	ID.	ADMTD.
80	RAP 1 and RAP 2	553
81	(Terrero) SSU Response to OPC Document Request 279	514 553
82	(Terrero) Bill of Mr. Mynatt	545

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## P R O C E E D I N G S

(Transcript continues from Volume 4.)

BY MR. PELLIGRINI:

Q But Mr. Terrero, isn't that the effect of bringing the system, that part of the system which is, in fact, in exceedance below the exceedance level?

A No, I think that, let's say that here in Tallahassee how many customers do you have. Are you going to tell the utility in Tallahassee that they are actually hiding their information? They are not. It is just a larger customer base. And that is what is base.

Actually, the level that we have is based on taking two liters per day for 70 years and one in 10,000 will die. Out of the 20 percent that all is based on the water. Actually the water is just 20 percent of your daily diet. So, what we are talking about is a larger customer base. And you have it in Tallahassee. You have it in Jacksonville. It is just a larger base.

Q Well, at the risk of beating a dead horse, if you just analyzed the samples taken from those residences in Beacon Hills you wouldn't, in fact, find an exceedance level; is that not correct?

1           A     If we put them together, we won't have the  
2 exceedance level. It doesn't mean that we want to  
3 hide the results. It doesn't mean we are not going  
4 to have the treatment in place. And we were doing  
5 what we are supposed to do. We are, we have news  
6 media releases and everything else.

7           Q     Let's go back to the line of questioning I  
8 was working on with you a moment ago. The tests in  
9 this proceeding is 1996, correct?

10          A     Yes.

11          Q     I'm talking about capital projects.

12          A     Right.

13          Q     Does planned service from 12/9/96 include  
14 your projected budgeted capital additions for 1996?

15          A     Yes.

16          Q     So, if you decide not to complete some  
17 projects, rates will have been set in part based on  
18 those projects; is that not correct?

19          A     I'm not a rate person, so I don't know what  
20 that would do.

21          Q     You will perhaps recall in your recent  
22 deposition, Mr. Terrero, you agreed to check to see  
23 if the utility had furnished the response, a response  
24 to an October 5, 1995, sanitary survey letter. Did  
25 you have an opportunity to do that?

1           A     No, I didn't.

2                   MR. FEIL:    Could you please, Mr.  
3 Pelligrini, refer us to perhaps the specifics behind  
4 the letter for which service area it was for?

5                   MR. PELLIGRINI:  Yes, Mr. Feil.  This was  
6 in relationship to Exhibit JLF-1 attached to the  
7 direct testimony of J. Lee Faircloth of HRS.

8                   MR. FEIL:    Apparently Mr. Terrero does not  
9 have that with him.  Since he will be up again on  
10 rebuttal we will make sure that he has that available  
11 when he is up on rebuttal.

12                   MR. PELLIGRINI:  That is fair enough.

13 BY MR. PELLIGRINI:

14           Q     Mr. Terrero, I'm going to refer to you an  
15 exhibit -- Madam Chairman, may we have it identified  
16 for, marked for identification purposes, please?

17                   CHAIRMAN CLARK:  Yes.  Mr. Pelligrini, do you  
18 have more than this one exhibit to be identified for  
19 this witness?

20                   MR. PELLIGRINI:  I do not.

21                   CHAIRMAN CLARK:  Okay.  Staff exhibit,  
22 which is entitled SSU Response to OPC Document  
23 Request 279 will be marked as Exhibit 81.

24                           (Exhibit No. 81 marked for identification.)

25 BY MR. PELLIGRINI:

1 Q Do you have the exhibit before you, Mr.  
2 Terrero?

3 A Yes, sir.

4 Q Could you generally describe the nature of  
5 the request and your response?

6 A I believe it says provided supporting  
7 documents to confirm that SSU has checked inflow and  
8 infiltration levels of all wastewater systems. And  
9 what was done is that we took the amount of water  
10 treated or wastewater treated, and divided into 120  
11 gallons per day per capita, and we estimated about a  
12 2.7 person per unit or per connection. That is how  
13 the table was made.

14 Q You are the sponsor of this response with  
15 Mr. Gangnon?

16 A Partially, yes; yes, I am. I think that  
17 Dave Denney was partially on this answer here.

18 Q All right. In this document request in  
19 your response you indicate you show eight systems,  
20 eight wastewater systems identified as having  
21 excessive inflow and infiltration by the EPA  
22 methodology; is that true?

23 A I don't think actually that is a good  
24 statement. The reason being those systems are  
25 actually multifamily. And what I said before is this

1 was based on the number of connections.

2 Q Excuse me, Mr. Terrero, but you do show  
3 eight systems with excessive infiltration, inflow and  
4 infiltration numbers?

5 A I have all six; Amelia Island, Sunshine  
6 Parkway, South Forty, Central Commerce Park and Marco  
7 Island. Are there any others?

8 Q Well, Lake Gibson, but that is a non-  
9 facility, but it is known in the exhibit. I read  
10 Amelia Island, Sunshine Parkway, South Forty, CCP,  
11 Leilani Heights, Beecher's Point, Marco Island and  
12 Lake Gibson. That is the eight that I read. Would  
13 you agree?

14 A Correct.

15 Q And in the narrative accompanying this  
16 document you state that five of the systems had  
17 understated allowances due to understated  
18 populations; is that correct?

19 A That's correct. Also Beecher's Point also  
20 has a multifamily.

21 Q Yes. That's not a statement you made in  
22 the narrative response?

23 A That's correct. It wasn't made.

24 Q You are making that statement presently?

25 A Yes.



1 Q Was this problem due to the EPA  
2 customer-to-population conversion factor?

3 A This was based on --

4 Q The understated allowance, I'm sorry.

5 A Pardon me?

6 Q The understated allowances, were they due  
7 to the EPA customer-to-population conversion factor  
8 of 2.7?

9 A No, the 2.7 was based on what we feel is  
10 the population per connection. That includes either  
11 residential and a, how you call it, multifamily.

12 Q But is it that factor that caused the  
13 allowance to be understated?

14 A No, it is not. The factor that you don't  
15 have there is, for example, Marco Island, I believe  
16 we have 1,931 connections. And you know that Marco  
17 Island and I know that Marco Island doesn't have  
18 1,931 connections. Actually there is hotels there  
19 with 400 units. And those were not included in  
20 here. This was a very preliminary view of what we  
21 had.

22 Q But Mr. Terrero, isn't the understatement  
23 due to the use of the factor of 2.7 times the EPA  
24 average allowable? Not the number of customers, I'm  
25 sorry.

1           A     That's correct. So if you have the right  
2 number of customers, the right number of units, you  
3 wouldn't be exceeding it.

4           Q     But that is the point, isn't it, that the  
5 factor 2.7 is not a representative factor?

6           A     No, that it is not a representative  
7 factor. It is the number of connections.

8           Q     In the cases of those systems for which  
9 there is an understated allowance.

10          A     Right. Like I said, Marco Island has 1,931  
11 connections. And that is not what we have there. We  
12 have close to 12,000 units.

13          Q     All right.

14          A     You understand what I'm saying?

15          Q     Yes, for the moment. Did you consider or  
16 did you use alternate methods to evaluate these five  
17 utilities?

18          A     We haven't gone any farther than this at  
19 this time.

20          Q     Why is that?

21          A     Because we have not had time between the  
22 rate case and the projects that we have going.

23          Q     Is it your intention to at some point?

24          A     We are actually, this is a question that  
25 you can ask Dave Denny, but we are actually looking

1 at infiltration in different areas. We are grouting  
2 sewer systems. So we are taking care of the lines as  
3 fast as we can.

4 Q Might you agree, Mr. Terrero, that the  
5 method of using 80 percent of water flows to  
6 estimated wastewater flows be considered a valid  
7 method?

8 A No, I don't.

9 Q A better method? Why is that?

10 A Because you have, if you look at this, this  
11 was done by the EPA in a high area, an area with a  
12 high water table. In other words, in most of the  
13 system the water table is high. So you have some  
14 infiltration. So you are allowed to have some  
15 infiltration in addition to the 80 percent.

16 Now in order for anything to be done,  
17 you've got to, you have to exceed certain amounts.  
18 So what EPA is saying, don't touch the system, it  
19 doesn't exceeds those numbers.

20 Q Without regard to the specific water table  
21 level, is not the method which I described a valid  
22 method that is the use of 80 percent of water flows  
23 to estimated wastewater flows, is that not a valid  
24 method, never the less?

25 A You have to go system by system. I would

1 say Marco Island is not.

2 Q In other systems it might be?

3 A You take a real high and dry system, there  
4 is not many around in this state like that.

5 Q So the variable would be the water table  
6 would be the most influential variable concerning the  
7 validity of this method?

8 A Would you repeat that question, please?

9 Q Would this method of 80 percent of water  
10 flows be valid with a higher allowance?

11 A What kind of allowance are we talking  
12 about?

13 Q Higher allowance based on the water table?

14 A No. If we are going to actually look at  
15 the, I mean, either we are going to follow one  
16 procedure or another. I think that EPA has come out  
17 with a method that is very economical for everybody  
18 to really assess the infiltration inflow to the  
19 system. We are not going to re-invent the wheel.

20 Q Mr. Terrero, you are familiar with the ten  
21 states standards and MOP or nine methodologies?

22 A Somewhat.

23 Q I'm sorry?

24 A Somewhat.

25 Q Yes. Would you agree they give methods for

1 calculating allowable inflow and infiltration based  
2 on diameter, length and age of a collection system?

3 A Usually that is for newly installed  
4 systems.

5 Q Could this be considered a valid method  
6 even where actual populations are unknown?

7 A I wouldn't consider it unless it is a real  
8 new system. That is just for testing to make sure  
9 you don't have infiltration on a new system.

10 Q Why is it limited to new systems?

11 A Because that is the way that the vendor  
12 puts it actually in the specifications, is the method  
13 of testing in new system. As systems deteriorate you  
14 are going to have some more infiltration. But it is  
15 not going to exceed what EPA is allowing and, you  
16 know, the EPA has allowed this amount because they  
17 did a special project on this item.

18 Q Many of SSU's systems are composed of  
19 systems serving one or two persons in retirement  
20 communities while even others have part-time  
21 residents; isn't this true?

22 A Yes.

23 Q Then with reference to that question and  
24 your response, since the EPA uses a 2.7  
25 population-per-customer conversion, is it not true

1 systems in this category would have overstated  
2 populations?

3 A Like which system?

4 Q I'm sorry?

5 A Like which system?

6 Q The systems I described those with one or  
7 two persons, retirement communities, those with  
8 part-time residents.

9 A You can have lets say Marco Island, Marco  
10 Island gets a season in November through May. And  
11 then you get another influx of people from Miami from  
12 June on.

13 Q What about anyone of those systems in the  
14 list which are showing favorable conditions?

15 A Then the condition would be that there is  
16 high ground water. Take a look at Spring Hill. That  
17 is real high ground. It is very percolating. The  
18 system shows good. There is no high water table  
19 there in Spring Hill.

20 Q The point of my question is, the point of  
21 my question is, is misstatements of population due  
22 the use of this factor of 2.7 and distorted results?

23 A I think the 2.7 came from like a 3.5 to a  
24 2.2. So an average was 2.7. This is not a final  
25 document. This is a preliminary estimate to make

1 sure we didn't go and spend a lot of money on these  
2 systems and then billed customers for it.

3 Q In the response to this document request,  
4 OPC's Document Request 279, is it not true that only  
5 the EPA method was used and exceptions were stated  
6 where systems with inflow and infiltration were  
7 overstated due to this method?

8 A I couldn't tell you what other method we  
9 used. I believe we used other methods, but I can't  
10 recall what method was used or anything else. I know  
11 that this was the method we concluded was the best  
12 method to take a look at the utilities.

13 Q Well, the EPA method was, in fact, used for  
14 this analysis; was it not?

15 A Pardon me?

16 Q The EPA method was used for this analysis?

17 A Yes.

18 Q And you offered explanation only for those  
19 systems in which the infiltration was overstated, the  
20 five systems.

21 A That's correct.

22 Q Why were explanations given only for those  
23 situations, that is, those situations of  
24 overstatement and not explanations for  
25 understatements, given the possibility that errors

1 could go to one side or to the other?

2 A Well, like I said this was a preliminary  
3 study that we did. And it was based on the number of  
4 connections. And we believe that the 2.7 made a  
5 representation of the general amount of people that  
6 reside on each residence.

7 Q Would you agree with me then there is some  
8 possibility that those systems which are shown with a  
9 favorable result might not, in fact, be operating  
10 favorably in respect --

11 A I couldn't tell you that, but that will be  
12 something that will have to be reevaluated.

13 Q I'm sorry?

14 A That will be something that will have to be  
15 reevaluated. Based on the study that we did, this is  
16 the figures we got.

17 Q But at least it is, at least it is a  
18 possibility, a theoretical possibility based on the  
19 use of an average factor.

20 A I think we are full of possibilities here.  
21 People are saying here that Marco Island is going to  
22 sink. What we need now to say is that --

23 Q I'm not talking about that.

24 A Well, it is the same thing. We are just  
25 going here and creating theoretical issues here that,



1 you know, it doesn't, we didn't do it our way. We  
2 went and followed a procedure --

3 Q I'm sorry, go ahead. Complete your  
4 answer.

5 A We went and followed a procedure and that's  
6 what we followed. We could have done it 20 different  
7 ways. There is 20 engineers. You ask 20 different  
8 engineers, they will do it 20 different ways. This  
9 is the way we chose to do it. It is a method that  
10 was actually developed in Tampa because of the high  
11 water level that we have in this area and it is the  
12 way that even EPA will fund in its system to a  
13 community.

14 Q I'm simply seeking, Mr. Terrero, your  
15 agreement or not that the application of this method  
16 could have as easily produced errors in terms of  
17 underallowance, as in terms of overallowance.

18 A Well, these are the results that I got.

19 Q You wouldn't make that concession?

20 A I wouldn't.

21 Q That the methodology is vulnerable to  
22 errors in both directions?

23 A (Shaking head.)

24 Q Your answer is "no"?

25 A No.

1 Q The water table meter will give  
2 infiltration whether you have in-sewage flows or not;  
3 is that correct?

4 A Depending on the season, yes.

5 Q Then the authorized sewage flows should be  
6 estimated by taking 80 percent of water sold; isn't  
7 that correct?

8 A No.

9 Q Why?

10 A Because it doesn't represent a -- if you  
11 take the water sold on Marco Island for example, not  
12 all the units that are in the water and the sewage  
13 system, so you will be getting a false reading.

14 CHAIRMAN CLARK: Mr. Terrero, while he is  
15 talking to his engineer, let me get some  
16 clarification on an issue you discussed -- starting  
17 on page 15, I guess, your answer starts. It is a  
18 recommendation by you that we move some plant held  
19 for future use to plant in service.

20 You indicate for Citrus Springs it was a  
21 test well site. And you, I think, indicate that at  
22 some point in the future it will become a well site,  
23 and therefore, property that is being used and useful  
24 in providing utility service to Citrus Springs; is  
25 that correct?

1 THE WITNESS: That's correct.

2 CHAIRMAN CLARK: Okay. When do you  
3 estimate, do you have an estimate of when you believe  
4 that well will be operating and providing water?

5 THE WITNESS: What I said before, Madam  
6 Chairman, on that site where we have located that  
7 well, we are going to actually build a storage tank  
8 this year and high service pumps. That well might  
9 serve to us as a refilling or replenishment of the  
10 tank.

11 CHAIRMAN CLARK: So you are going to build  
12 a storage tank. And I'm sorry, I didn't catch the  
13 other thing.

14 THE WITNESS: We are going to build a  
15 storage tank and high service pump.

16 CHAIRMAN CLARK: A high surface.

17 THE WITNESS: High service.

18 CHAIRMAN CLARK: High service, okay.  
19 Okay. My question to you is, I had understood that  
20 your test here was projected 1996 test year. If that  
21 is the case, why weren't these included as in the  
22 rate base if they were going to be in service in  
23 1996?

24 THE WITNESS: I believe this one is  
25 included subject to check. I believe it is

1 included.

2 CHAIRMAN CLARK: All right. Then we can  
3 follow up on that later.

4 MR. FEIL: Commissioner, were you referring  
5 to the facilities or the land being in the rate  
6 base?

7 CHAIRMAN CLARK: Well, I guess it is the  
8 land because that is what is referred to here.

9 THE WITNESS: The land we place in rate base,  
10 but you know, what I'm saying is that this, this land if  
11 we need it for the facilities we are going to place on  
12 that site, and what I said before is that I believe that  
13 all the land that we have at like Citrus Springs should  
14 be used and useful. It should be give us the volume  
15 because we have saved those parcels of land for future  
16 and existing customers.

17 CHAIRMAN CLARK: All right. Maybe I  
18 misunderstood it. You are indicating that the land  
19 on which the storage tank is located and the high  
20 service pump doesn't encompass all the land that you  
21 are recommending be put into rate base, but it is  
22 your view that because it is going to be located  
23 there, and used in the future it should all be put  
24 into rate base, all the land.

25 THE WITNESS: Well, the land on this site,

1 yes. It should be all used and useful. What I'm saying  
2 is in addition to that we have reserved about six other  
3 sites at Spring Hill for future and existing customers.  
4 When I say future, to me when you acquire the land you  
5 are actually helping the existing customers because  
6 those existing customers are not going to have to pay  
7 for a real high price of that land.

8 CHAIRMAN CLARK: That's a trade off. I  
9 would agree with that, Mr. Terrero. But just clarify  
10 for me, is Citrus Springs part of Spring Hill?

11 THE WITNESS: No, it is not.

12 CHAIRMAN CLARK: Okay. I just want to  
13 focus --

14 THE WITNESS: Citrus Springs is in Citrus  
15 County.

16 CHAIRMAN CLARK: I just want to focus on  
17 what you listed here on page 15.

18 THE WITNESS: Okay.

19 CHAIRMAN CLARK: Deltona Lakes, you also  
20 have a test well there.

21 THE WITNESS: That's correct. On this site we  
22 don't know when are we going to need the water out of  
23 this well. And again, on the Deltona Lakes, again what  
24 I'm saying is that since we have a well there, we have  
25 the site there, that the distribution system has been

1 designed to take the water out of there, and has been  
2 maximized to -- with that site in mind, it should be  
3 used and useful.

4 CHAIRMAN CLARK: Okay. The distinction you  
5 are making is you think it should be in rate base now  
6 and earning a return on and a return of investment,  
7 as opposed to being a plant held for future use which  
8 might have an allowance for funds prudently  
9 invested.

10 THE WITNESS: That's correct.

11 CHAIRMAN CLARK: Okay. But you have, would  
12 it be your estimate that the Deltona Lakes site would  
13 be, you would, in fact, put wells there that would be  
14 used and useful in providing service say before the  
15 end of '96?

16 THE WITNESS: Could be, yes.

17 CHAIRMAN CLARK: Okay. What about Marco  
18 Island?

19 THE WITNESS: Marco Island is the 160 acres.  
20 Presently we have completed the request from the water  
21 management district. The only thing that is pending is  
22 the easement to transport the water from the site to  
23 Collier Lakes or the raw water supplies lakes. We are  
24 in the process of obtaining those easements.

25 CHAIRMAN CLARK: When you get the easement,

1 then you will begin putting in the main, the  
2 transmission line.

3 THE WITNESS: That's correct.

4 CHAIRMAN CLARK: When do you estimate that  
5 being done?

6 THE WITNESS: I believe that will be late  
7 '96 or '97, start in '96, '97.

8 CHAIRMAN CLARK: Okay. When do you believe  
9 it will function to actually bring water to Marco  
10 Island?

11 THE WITNESS: I would say about 18 months.

12 CHAIRMAN CLARK: Okay. Finally, Marion  
13 Oaks.

14 THE WITNESS: Marion Oaks is a site that we  
15 are going to drill a new well, actually all the permits  
16 are in hand. It is a relocation of an existing well  
17 that is adjacent to the wastewater treatment plant and  
18 by permit we have to remove it from there.

19 CHAIRMAN CLARK: When do you have to remove  
20 it, by when?

21 THE WITNESS: I can't tell you when we have  
22 that, but we got the permits. We are proceeding for  
23 construction. We were supposed to remove it in 12  
24 months after the permit was issued, so actually  
25 presently we are late.

1           CHAIRMAN CLARK: You were supposed to  
2 remove the existing well within 12 months of getting  
3 a permit to drill the new well.

4           THE WITNESS: Start construction of the new  
5 well, yes.

6           CHAIRMAN CLARK: Start construction or the  
7 permit? I'm sorry, Mr. Terrero, let me ask my  
8 question more clearly. You were supposed to start  
9 construction of the new well within 12 months of  
10 getting the permit for that well?

11          THE WITNESS: No. You have to, we had to  
12 start construction of the well 12 months after we were  
13 issued the permit for the wastewater treatment plant.

14          CHAIRMAN CLARK: Okay. Okay.

15          THE WITNESS: Because what happened is the  
16 well is located like just about 490 feet from the  
17 percolation pump.

18          CHAIRMAN CLARK: When was the permit issued  
19 for that wastewater plant?

20          THE WITNESS: I can't recall the date on that,  
21 Madam Chairman.

22          CHAIRMAN CLARK: Was it sometime in 1995?

23          THE WITNESS: Yes, ma'am.

24          CHAIRMAN CLARK: Okay. Thank you, Mr.  
25 Terrero. Staff.



1 BY MR. PELLIGRINI:

2 Q Mr. Terrero, earlier today Mr. Mynatt  
3 testified about the lead problem in Beacon Hills.  
4 You weren't present, but I think you were aware.

5 A No, I wasn't.

6 Q My question is have you tested Mr. Mynatt's  
7 water which were lead --

8 A Yes, we have.

9 Q Were these early -- did you test his water  
10 during the most recent of these tests?

11 A I don't believe we did.

12 Q Why is that?

13 A We have a sampling protocol from the  
14 county. In order to, for us to not to go out of that  
15 plant, we have to go back to the county and request  
16 another approved plan. So the plan we have is  
17 approved and those are the samples that were taken.

18 Q The sampling protocol, can you describe its  
19 limitations?

20 A In the sampling -- which protocol are you  
21 talking about?

22 Q Well, I believe you testified that you  
23 conducted the sampling according to a protocol, a  
24 certain protocol. Was it EPA protocol or HRS?

25 A The protocol is that you send to the HRS a

1 plan with the location of the sites to be tested, and  
2 then they approve it. And that is where you sample.  
3 Usually you try to get homes that don't have  
4 softeners, they don't have our old system. As a  
5 matter of fact, I believe Mr. Mynatt has a couple of  
6 those. So it would not be a good sampling site  
7 because he is actually retreating the water that we  
8 treat.

9 Q Do I understand you to say the HRS protocol  
10 identifies specific sites to be sampled?

11 A Yes. We have a list we have provided the  
12 HRS. That is the list we sample from.

13 MR. PELLIGRINI: I think that concludes my  
14 questions. Thank you, Mr. Terrero.

15 CHAIRMAN CLARK: Thank you, Mr.  
16 Pelligrini. Commissioners?

17 Mr. Terrero, I have one other thing I want  
18 to ask you. It is just because you have some  
19 experience in the area with respect to back flow  
20 prevention procedures and cross connection control  
21 requirements. And I expect that you have a broad  
22 background in those areas. My question to you is it  
23 typically necessary to put back flow prevention  
24 devices on residential customers?

25 THE WITNESS: It is not required as such.

1 The DEP is not enforcing it. That is what I  
2 understand right now. If you see that there is a  
3 pollution source like a person that has a well in his  
4 backyard, then it is necessary to install one, but it  
5 is not necessary to install in all the customer  
6 connections.

7 CHAIRMAN CLARK: Well, let me ask you a  
8 different way. Is it unusual to have to install a  
9 back flow prevention device on a residential  
10 connection?

11 THE WITNESS: No. I wouldn't say it is not  
12 unusual because let's say for example you have a person  
13 that is spraying their lawn with any of the let's say  
14 fertilizers. And by any reason you lose pressure in  
15 your system, it could really soak it into the system.  
16 So that would be an advantage to have that back flow  
17 preventer.

18 CHAIRMAN CLARK: But it isn't required for  
19 the most part?

20 THE WITNESS: Not as such, it is not being  
21 enforced. It is not being enforced by all district  
22 offices.

23 CHAIRMAN CLARK: Okay. Thank you. Mr.  
24 Feil, redirect.

25 MR. FEIL: Thank you, Madam Chairman.

## REDIRECT EXAMINATION

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BY MR. FEIL:

Q Mr. Terrero, when Mr. Riley was questioning you regarding the lot count method, he may have used the term "fairly" in whether or not the lot count method was used by the Commission in terms of fairly allocating costs for distribution facilities.

Do you agree that the lot count method is a fair way of allocating costs?

A No, it is not.

Q Could you tell me why not?

A The reason being is it doesn't follow any engineering procedures. It is, you are going to go by the lot count, you, what you are saying is actually that you have a water main coming in front of a lot. You have another lot. Then you have an empty space. You have to have some water going from one lot to the other one. So what we are saying by lot count is we don't have an existing line in there. It is very unfair. It is very account oriented instead of being engineering oriented.

Q Could you tell me why used and useful should parallel design considerations rather than lot count method not based on any design or engineering considerations?

1 A Could you repeat that question again?

2 Q Could you tell me why used and useful for  
3 transmission and distribution should follow design  
4 considerations rather than the lot count method which  
5 does not follow design considerations?

6 A There is a lot of things in designing a  
7 system. For example, you have fire flows that in the  
8 system that you have to design for, even though you  
9 don't have a fire hydrant on the line. You have to  
10 design for fire flows, depending on county or local  
11 standards, is the actual way of really maximizing  
12 your distribution system for your customers. I don't  
13 believe that the lot count method really addresses  
14 any, any, any engineering whatsoever.

15 Q So is it your testimony that used and  
16 useful determinations of the Commission dictate to  
17 some extent the design and investment decisions that  
18 a utility company makes?

19 A Yes, it does. It is not the best  
20 engineering way of doing it.

21 Q By the method you just referred to, I  
22 assume you meant the lot count method was not the  
23 proper engineering way?

24 A That's correct. It is not an engineering  
25 way, period.

1           Q     Okay.  When you were asked questions from  
2 Mr. Twomey and by Mr. Pelligrini regarding lead and  
3 copper levels, you had twice attempted to make a  
4 statement regarding lead and copper in the state  
5 generally.  Could you please tell the Commission your  
6 study results regarding lead and copper in the state?

7           A     The results that I got, what I wanted to  
8 mention is that even the state is having a real hard  
9 time trying to follow this rule.  I think every, the  
10 HRS and even the DEP is learning, in a learning  
11 curve.  What I call, I called every district office  
12 for this information.  And there was no district  
13 office, not even in Duval County could tell me how  
14 many systems were out of compliance, in compliance or  
15 whatever.

16                     So finally, out of Tallahassee I got a  
17 listing of a system that had been surveyed by DEP.  
18 In that one we have 2,136 systems that were surveyed  
19 and actually 404 are out of compliance or have  
20 exceeded the copper action level.  The lead they have  
21 exceeded about 256 of those there.

22                     And this is the really revealing thing,  
23 that 896 have exceeded the copper levels in one way  
24 or the other without, without triggering the action  
25 levels.  And 1,333 have exceeded the lead levels in

1 one way or another without triggering the action  
2 levels. Of those we have 106 systems that are SSU's  
3 systems of those shown on the list.

4 And I'm going by the list, there is 15 only  
5 with copper action level; 11 was lead action levels.  
6 And of those, 29 have exceeded copper, and 39 have  
7 exceeded lead without triggering the action levels.

8 I think this is revealing to every  
9 professional that there is a, something that is more  
10 an art than engineering. It depends on the quality  
11 of the water. It depends on the system. That is  
12 what EPA has actually gone on ahead and given you all  
13 the time they are giving us to 1997. Then after that  
14 we have a month to prove that we really have the  
15 right equipment, the right system.

16 Q Have you calculated any percentages as to  
17 how SSU compares with DEP regulated plants as a  
18 whole?

19 A I did not, Mr. Feil. I started doing it,  
20 but I didn't get it completed.

21 Q All right. When you said exceeding lead  
22 levels without triggering the action level, what were  
23 you referring to specifically?

24 A What I was referring to were samples were  
25 taken and actually some of the samples exceeded the

1 15 micrograms per liter or the 1.3 milligrams per  
2 liter in copper in some way or another.

3 Q Did you contact the Duval County Public  
4 Health Unit to discuss lead and copper levels for  
5 utilities in the Jacksonville area, generally?

6 A Yes.

7 Q And what information did you find out from  
8 that study?

9 A There are several systems that are out of,  
10 have triggered the action levels, including the  
11 Jacksonville suburban. It is about six systems, just  
12 glancing at them, they are exceeding it. Also, there  
13 was a newspaper article on the Regency Utilities by  
14 where they have also exceeded the lead action level.

15 There is a comment here by Mr. Carter,  
16 which is a lead and copper official for Duval  
17 County. He is stating here, I quote, "There is no  
18 penalties involved other than they have to resolve  
19 the problem. But it is not something that happens  
20 overnight." That is his quotation.

21 Q Okay. What conclusion do you draw from the  
22 information you gathered regarding the Jacksonville  
23 area as to Southern States lead levels at the Beacon  
24 Hills plant?

25 A That most of the utilities in the area have



1 the same problem. We have addressed the problem. As  
2 a matter of fact, we have started sampling early. We  
3 were supposed to start sampling in '93. We started  
4 sampling in '92. We feel we are being proactive in  
5 the lead and copper issue.

6 Q Do you believe that the commonality of the  
7 problems for utilities in the Jacksonville area rises  
8 from the raw water in the area?

9 A Yes, it does. The water is very  
10 aggressive. It is very hard to treat. It has a lot  
11 of hydrogen sulfide which makes it worse to treat.

12 Q Could you tell me effects of going to  
13 reduced monitoring under the lead and copper rules as  
14 far as triggering the action levels is concerned?

15 A What happened is that in a portion of the  
16 rule, it actually -- if you have two samplings, and  
17 you pass both samplings, you will be entitled to go  
18 with reduced monitoring.

19 What happened, a lot of utilities went  
20 ahead and said, well, we can save some money by  
21 sampling less sites. And what happened, they,  
22 everybody was triggered by exceeding the action  
23 levels. And I don't believe that we should have  
24 reduced monitoring. I think we should have still the  
25 same monitoring that we have and just treating until

1 we get the problem solved.

2 Q Mr. Pelligrini asked you a few questions  
3 about combining Beacon Hills and Cobblestone for lead  
4 and copper test purposes. Will SSU notify those  
5 customers from whom the samples were taken even if  
6 Beacon Hills and Cobblestone are combined for  
7 sampling purposes?

8 A Yes, sir.

9 Q So if a customer had water taken from his  
10 tap and the test result from that tap water indicated  
11 that the MCL was exceeded, that customer will be  
12 notified?

13 A Yes. Any customer that actually  
14 participated in the program will be notified either  
15 it passed or that it didn't pass.

16 Q That direct notification is separate and  
17 apart from the public notification?

18 A That's correct.

19 Q By not combining Beacon Hills and  
20 Cobblestone has SSU in the past placed a higher  
21 standard on itself than that required by law as to  
22 lead and copper testing?

23 A Yes, it has.

24 Q I believe you made some reference to what  
25 the standard, how the standard was set for MCL levels

1 for lead. Could you repeat what that standard was  
2 for the record?

3 A The standard is 2 liters per day for 70  
4 years. And that will be one in 10,000 people will  
5 die. In this, well, this amount of water that we are  
6 talking about and this level that has been set by EPA  
7 and DEP is actually based on 20 percent of your daily  
8 intake of lead. So actually, you have a fire flow  
9 there. Also, the level that has been set has been  
10 based on that you take the first draw and you drink  
11 that. And then your second glass of water will be  
12 from the second minute that you drink the water. So  
13 it is the worse case is consider five times of the  
14 level that you can tolerate in a day times two.

15 Q Was the two liters of water you referred to  
16 supposed to be from the same source as far as setting  
17 a standard is concerned?

18 A Yes.

19 Q The one in 10,000 you referred to, is that  
20 one in 10,000 deaths or one in 10,000 impact with  
21 regard to chance of getting cancer that one would  
22 otherwise not have?

23 A The chance of getting cancer.

24 Q Have you had the opportunity to obtain a  
25 copy of Mr. Mynatt's bill for November of '94?

1 A Yes, I do.

2 Q And you obtained that after Mr. Twomey had  
3 asked you questions; did you not?

4 A That's correct.

5 Q Can you tell me whether or not there is a  
6 notation on the bill regarding notifying Mr. Mynatt  
7 for lead?

8 A Yes, there is a note here that says, "Some  
9 homes in your community have elevated lead levels in  
10 their drinking water. Lead composes a significant  
11 risk to your health. Please read enclosed notice for  
12 further information." It is addressed to David M.  
13 Mynatt, 4523 Breakwater Road, W, Jacksonville,  
14 Florida 32225-1008.

15 MR. FEIL: Commissioner, I would like to  
16 ask that the bill that Mr. Terrero just read from be  
17 identified as Exhibit 82. We do not have copies at  
18 the present time. We will provide copies to the  
19 parties first thing in the morning, so I am not going  
20 to be able to move it into evidence this evening.

21 CHAIRMAN CLARK: All right. A bill from  
22 Mr. Mynatt dated what? What was the date of that  
23 bill?

24 THE WITNESS: The billing date is 10/18,  
25 pardon me, it is 12/31/92. Billing date is 11/30/94.

1 CHAIRMAN CLARK: We will show that as being  
2 marked as an exhibit. And when you provide copies of  
3 it, we will deal with moving it into the record.

4 (Exhibit No. 82 was marked for  
5 identification.)

6 BY MR. FEIL:

7 Q Mr. Terrero, do you know if SSU retains  
8 photocopies of every bill it sends out?

9 A I believe we've got some. I don't know if  
10 we have all of the photo copies, but I was able to  
11 obtain this when I called after I was crossed by Mr.  
12 Twomey.

13 Q Do you know whether or not SSU retains  
14 copies of bills through some other method of  
15 electronic storage?

16 A Microfiche.

17 Q Mr. Twomey asked you a number of questions  
18 concerning Palm Valley. At the time he asked you  
19 questions referring to your deposition, have you had  
20 the opportunity to review the deposition transcript?

21 A No, sir.

22 CHAIRMAN CLARK: Mr. Terrero, was that a  
23 "no, sir?"

24 THE WITNESS: Pardon me? That's a "no, sir."

25 BY MR. FEIL:

1 Q I am going to ask that the deposition  
2 transcript be handed to you, Mr. Terrero. I would  
3 ask that you read from page 89 of the transcript  
4 regarding questions he asked you for Palm Valley.  
5 Then after you have had the chance to review it, I  
6 would like for you to read what appears on that page,  
7 please.

8 (Brief pause.)

9 MR. TWOMEY: Madam Chairman, while he is  
10 reading that I would ask that I could see this  
11 purported --

12 CHAIRMAN CLARK: We won't enter it into the  
13 record until you've had an opportunity to look at  
14 that bill.

15 MR. TWOMEY: I would like to ask some  
16 additional questions on it.

17 CHAIRMAN CLARK: It is identified as an  
18 exhibit. If after you look at it tomorrow, you feel  
19 you need to ask questions, or I guess Wednesday, we  
20 will handle it at that time.

21 MR. TWOMEY: Thank you.

22 THE WITNESS: Okay.

23 BY MR. FEIL:

24 Q Could you please read from that page?

25 A You want me to read the whole page or just

1 the bottom of the page?

2 Q Just read the entire page, question and  
3 answer, please.

4 A "Question: Palm Valley. Do you recall, Mr.  
5 Terrero, when you made the million dollar, you say  
6 million dollar improvement, right?

7 "Answer: Someplace around there, yes.

8 "Question: Okay. When did you make those  
9 improvements, do you recall?

10 "Answer: I can't recall. Probably '92,  
11 '93.

12 "Question: Can you tell me where I can  
13 find that information? Is it in the MFR?

14 "Answer: Yes, it is.

15 "Question: Okay. And you say that you,  
16 there is only about 200 customers in that system;  
17 right?

18 "Answer: Someplace in there, yes.

19 "Question: Okay. And I thought I heard  
20 you say that you would have made those improvements  
21 at a million dollars if you thought you had, were not  
22 going to be able to charge them under uniform rates.  
23 Did you say that?

24 "I don't recall," I said. That's an  
25 answer. "I don't recall," I said.

1 "First of all, this was a consent order  
2 that we had from DEP and we had to make the  
3 improvements.

4 "Question: You had to make the  
5 improvements?

6 "Answer: Yeah.

7 "Question: Did you buy Palm Valley or did  
8 you get in the receivership?

9 "Answer: I don't know."

10 Q Thank you. So, that transcript reveals  
11 that Palm Valley was under a consent order, correct?

12 A That's correct.

13 Q Okay.

14 CHAIRMAN CLARK: Mr. Feil, how much more do  
15 you have?

16 MR. FEIL: Maybe five minutes.

17 CHAIRMAN CLARK: Okay.

18 BY MR. FEIL:

19 Q Do you know or were you present when  
20 Mr. Denney was testifying?

21 A I was in and out.

22 Q Okay. Mr. Denney testified that even  
23 though SSU may be under a consent order or may have a  
24 regulatory requirement, depending on the presence of  
25 uniform rates, SSU might attempt to delay an



1 improvement. What is your testimony with respect to  
2 the effect of uniform rates and regulatorily mandated  
3 projects?

4 A Well, that is what I was saying before,  
5 that if we don't have the monies to make the  
6 improvements, we have to delay the projects and/or  
7 negotiate with regulatory agencies.

8 Q Do you know when the PSC obtained  
9 jurisdiction over Palm Valley?

10 A I can't recall.

11 Q Mr. Twomey asked you a question about  
12 enclosing a chlorine facility of some sort. Could  
13 you tell me whether or not DEP has expressed any  
14 concerns with regard to those facilities and the fact  
15 that they were not enclosed?

16 A They expressed concern, but they say that  
17 this issue is not being enforced by Tallahassee due  
18 to the cost of the facilities.

19 Q So is it your testimony that DEP was not  
20 concerned to the degree that it was going to require  
21 SSU to make the improvement?

22 A I think they want SSU to make the  
23 improvement, but they were not that concerned with  
24 the issue. I think they had to write on the report  
25 that it was not enclosed, and they requested that we

1 enclose it.

2 Q Mr. Pelligrini asked you a series of  
3 questions regarding why SSU only performed a  
4 hydraulic analysis on four of its service areas. Can  
5 you tell me whether or not in your opinion it would  
6 be cost effective for SSU to do a hydraulic analysis  
7 for every service area as part of this rate filing?

8 A I believe it would be so costly that we  
9 couldn't do it. Also, I think it will be so  
10 time-consuming that it is unrealistic.

11 Q Would it be time consuming because of the  
12 computer data entry that would need to be done in  
13 order to initiate the models?

14 A It would be to the data entry, obtaining  
15 maps, et cetera, et cetera, yes.

16 Q Do you think that the costs involved with  
17 performing the hydraulic analysis for the four  
18 service areas in this case should be a basis for  
19 rejecting the hydraulic analysis for those four  
20 service areas?

21 A No, sir.

22 Q Referring to the OPC Document Request 279  
23 and the infiltration and inflow questions you were  
24 asked, I don't want to -- Mr. Pelligrini didn't want  
25 to beat a dead horse, but let me ask one or two

1 simple questions.

2           The first is are you aware of any evidence  
3 presented in this case or any other evidence that SSU  
4 has excessive infiltration and inflow in any of its  
5 wastewater service areas?

6           A     No, sir.

7           Q     You also said that the 2.7 was based on an  
8 average of 3.5 and 2.2. Could you tell me the source  
9 of the 3.5 and 2.2 numbers, please?

10          A     3.5 is usually the site criteria when you  
11 have a new system. 2.2, I believe we went into the  
12 state average per capita, per household. It was  
13 around 2.2. So in all the design that we do, we  
14 usually use 2.7, which is an average of any utility.

15          Q     You said that Beecher's Point had some  
16 multifamily customers. Do you know whether or not  
17 Leilani Heights has, as well?

18          A     I do not recall about Leilani Heights. I  
19 believe they do, yes.

20          Q     Would Mr. Denney remember?

21          A     He probably does.

22          Q     Do you know, Mr. Terrero, whether or not  
23 the Commission has in the past has allowed a margin  
24 reserve for land?

25          A     Yes. Actually they, the case that I

1 mentioned was the Gulf Power appropriation by where  
2 the land was approved in 1980 for installation of a  
3 plant in 1995. And even though it says 1995, what I  
4 can read on the order is that it might not even be  
5 built in 1995. It could be later than that.

6 Q Was it identified in that order that you  
7 are referring to as a margin reserve?

8 A I believe it was, if I can find it. It was  
9 the plant held for future use. And it is, the  
10 company has included \$1,255,585 for the plant held  
11 for future use for its proposed rate base.

12 Q So the order indicates that it was included  
13 in the rate base, is that what you are saying?

14 A Yes.

15 Q All right.

16 COMMISSIONER KIESLING: Could I ask a  
17 question on that before you move on to the next  
18 area?

19 MR. FEIL: Sure.

20 COMMISSIONER KIESLING: Are you aware of  
21 any water and wastewater case in Florida that has  
22 received similar treatment?

23 THE WITNESS: No, I think it is discriminatory  
24 to the water and wastewater systems.

25 COMMISSIONER KIESLING: Thank you for

1 volunteering that, but your answer is no, right?

2 THE WITNESS: Right.

3 COMMISSIONER KIESLING: Thank you.

4 BY MR. FEIL:

5 Q Do you know whether or not the question  
6 Commissioner Kiesling asked was an issue in a recent  
7 GDU rate case?

8 A I don't know that.

9 Q Could you tell me who is the expert of  
10 preferred testimony regarding back flow prevention?  
11 Would that be you or Mr. Denney?

12 A That would be Mr. Denney.

13 MR. FEIL: I have nothing further.

14 CHAIRMAN CLARK: Thank you, Mr. Feil.  
15 Exhibits?

16 MR. FEIL: SSU moves, I believe it was  
17 Exhibit 80.

18 CHAIRMAN CLARK: Exhibit 80 will be entered  
19 without objection.

20 (Exhibit No. 80 was admitted into  
21 evidence.)

22 MR. PELLIGRINI: Staff moves Exhibit 81  
23 marked for identification.

24 CHAIRMAN CLARK: 81 will be moved without  
25 objection.

1 (Exhibit No. 81 was admitted into  
2 evidence.)

3 MR. FEIL: And 82, we will await copies of  
4 that item. We will now adjourn until 9:00 o'clock  
5 Wednesday morning.

6 MR. HOFFMAN: Madam Chairman, I would just  
7 announce for the record that the parties and staff  
8 have reached a stipulation to admit the direct  
9 testimony of Mr. Anderson into the record.

10 CHAIRMAN CLARK: Thank you, Mr. Hoffman.  
11 Mr. Anderson is a witness for SSU.

12 MR. HOFFMAN: Yes, ma'am.

13 COMMISSIONER KIESLING: I'm sorry,  
14 everybody has agreed do that?

15 MR. HOFFMAN: Yes, ma'am.

16 CHAIRMAN CLARK: We will take that up at  
17 the appropriate time to actually put the testimony  
18 into the record. With that, we are adjourned until  
19 9:00 o'clock Wednesday morning.

20 (Thereupon, the hearing adjourned at 8:03  
21 p.m. to reconvene at 9:00 a.m., Wednesday, May 1,  
22 1996.)

23

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24 (Transcript continues in sequence in Volume  
25 6)

DOCKET 950495-WS  
EXHIBIT NO. 81  
CASE NO. 96-D4227

EXHIBIT NO. 81

WITNESS: TERRERO

DOCKET NO. 950495-WS

Application for rate increase by  
SOUTHERN STATES UTILITIES, INC.

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**DESCRIPTION:**

SSU Response to OPC Document Request 279

FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET  
NO. 950495-WS EXHIBIT NO 81  
COMPANY/  
WITNESS:  
DATE: 4/29/56

APPENDIX 1 AS 2 11 11

SOUTHERN STATES UTILITIES, INC.  
RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS  
DOCKET NO.: 950495-WS

REQUESTED BY: OPC  
SET NO: 14  
DOCUMENT REQUEST NO: 279  
ISSUE DATE: 10/31/95  
WITNESS: Gagnon/Terrero  
RESPONDENT: Raymond E. Gagnon/Rafael A. Terrero

DOCUMENT REQUEST: 279

Provide supporting documents to confirm that SSU has checked inflow and infiltration levels of all wastewater systems.

RESPONSE: 279

SSU analyses infiltration and inflow using the guidelines supplied by the US Environmental Protection Agency in its handbook "Sewer System Infrastructure Analysis and Rehabilitation" (EPA/625/6-91/030, October 1991). This handbook states that I/I conditions can be determined in the sewer system by analyzing the preceding year's flow records from the treatment plant. It further sets the limits of I/I as follows:

"No further I/I analysis will be necessary if domestic wastewater plus non-excessive infiltration does not exceed 120 gallons per capita day (gpcd) during periods of high ground water....The flow rate of 120 gpcd for infiltration analysis contains two components: 80 gpcd of domestic base flow and 40 gpcd of non-excessive infiltration."

Appendix DR279-A is the analysis for each wastewater plant using this criteria. All but eight of the plants indicate that no further analysis is required. Of the eight that exceeded the EPA non-excessive I/I parameters, five involve large multi-family condominiums or apartments, or commercial/industrial complexes that are only counted as a single customer. This makes the analysis for Amelia Island, Sunshine Parkway, South Forty, Florida Central Commerce Park and Marco Island understated in terms of allowable I/I.

As a system, SSU falls well within the EPA guidelines for non-excessive infiltration and inflow.



Inflow & Infiltration Analysis

Year Ended: 12/31/94

Company: SSU / Uniform Plants

Line No.	Plant Name	Average Flow	Number of Cust's	Pop 2.7 x Cust	EPA Ave Allowable	Plant Ave in Excess of EPA	% of Ave Over/Under
1	Amelia Island	0.685	1345	3631.5	0.436	0.249	36.4
2	Sunshine Parkway	0.074	8	21.6	0.003	0.071	96.5
3	South Forty	0.033	25	67.5	0.008	0.025	75.5
4	Florida Central CP	0.039	44	118.8	0.014	0.025	63.4
5	Lailani Heights	0.132	342	923.4	0.111	0.021	16.1
6	Beecher's Point	0.007	16	43.2	0.005	0.002	25.9
7	Fox Run <sup>1</sup>			0	0.000	-	-
8	Park Manor	0.008	30	81	0.010	(0.002)	(21.5)
9	Silver Lake Oaks	0.005	25	67.5	0.008	(0.003)	(62.0)
10	Venetian Village	0.025	87	234.9	0.028	(0.003)	(12.8)
11	Morningview	0.008	36	97.2	0.012	(0.004)	(45.8)
12	Palm Port	0.019	97	261.9	0.031	(0.012)	(65.4)
13	Holiday Haven	0.015	97	261.9	0.031	(0.016)	(109.5)
14	Chuluota	0.026	133	359.1	0.043	(0.017)	(65.7)
15	Salt Springs	0.020	117	315.9	0.038	(0.018)	(89.5)
16	Burnt Store	0.113	406	1096.2	0.132	(0.019)	(16.4)
17	Jungle Den	0.016	119	321.3	0.039	(0.023)	(141.0)
18	Apache Shores	0.008	113	305.1	0.037	(0.029)	(357.7)
19	Sunny Hills	0.028	178	480.6	0.058	(0.030)	(106.0)
20	Point O' Woods	0.015	138	372.6	0.045	(0.030)	(198.1)
21	Fisherman's Haven	0.012	143	386.1	0.048	(0.034)	(286.1)
22	Citrus Park	0.045	268	718.2	0.086	(0.041)	(91.5)
23	Marco Shores	0.047	277	747.9	0.090	(0.043)	(91.0)
24	Woodmere	0.319	1141	3080.7	0.370	(0.051)	(15.9)
25	Leisure Lakes	0.010	231	623.7	0.075	(0.065)	(648.4)
26	Sugar Mill	0.118	615	1660.5	0.199	(0.081)	(68.9)
27	Citrus Springs	0.113	685	1849.5	0.222	(0.109)	(96.4)
28	Zephyr Shores	0.022	490	1323	0.159	(0.137)	(621.6)
29	University Shores	0.865	3195	8626.5	1.035	(0.170)	(19.7)
30	Palm Terrace	0.116	1021	2756.7	0.331	(0.215)	(185.2)
31	Marion Oaks	0.156	1336	3607.2	0.433	(0.277)	(177.5)
32	Beacon Hills	0.685	2990	8073	0.969	(0.284)	(41.4)
33	Sugarmill Woods	0.238	2240	6048	0.726	(0.488)	(204.9)
34	Deltona	0.767	4589	12390.3	1.487	(0.720)	(93.9)
<b>Uniform Totals</b>		<b>4.789</b>	<b>22575</b>	<b>60952.5</b>	<b>7.314</b>	<b>(2.525)</b>	<b>(52.7)</b>
<hr/>							
<b>Non Uniform Plants</b>							
35	Marco Island	1.792	1931	5213.7	0.626	1.166	65.1
37	Enterprise	0.036	126	340.2	0.041	(0.005)	(13.4)
38	Tropical Isles	0.017	221	596.7	0.072	(0.055)	(321.2)
39	Lehigh	1.446	6706	18106.2	2.173	(0.727)	(50.3)
40	Deep Creek <sup>1</sup>						
<b>Non Uniform Totals</b>		<b>3.291</b>	<b>8984</b>	<b>24256.8</b>	<b>2.911</b>	<b>0.380</b>	<b>11.6</b>
<hr/>							
<b>County Plants</b>							
42	Lake Gibson	0.094	264	712.8	0.086	0.008	9.0
44	Valrico	0.057	351	947.7	0.114	(0.057)	(99.5)
45	Spring Hill	1.346	5294	14293.8	1.715	(0.369)	(27.4)
46	Seaboard <sup>1</sup>						
<b>County Totals</b>		<b>1.497</b>	<b>5909</b>	<b>15954.3</b>	<b>1.915</b>	<b>(0.418)</b>	<b>(27.9)</b>
<hr/>							
<b>Company Totals</b>		<b>9.577</b>	<b>37468</b>	<b>101163.6</b>	<b>12.140</b>	<b>(2.563)</b>	<b>(26.8)</b>

<sup>1</sup> Purchase plants

Ex. 82

0002

SOUTHERN STATES UTILITIES, INC

LOCAL OFFICE PHONE 904-641-8332 OR  
CALL TOLL FREE 800-432-4501

322251008 MYNATT, DAVID M

BILLING DATE - 11/30/94  
CUST - 12510-4 W METER 01103685 12/31/92  
9-12/31/92  
5085113020 4523 BREAKWATER ROW W

M S 10/18-11/17/94	30	1471300	1472890	1590	
		WATER BASIC CHARGE			5.13
		SEWER BASIC CHARGE			12.67
		SEWER CHARGES			5.82
WATER	0-9999999	GAL B \$ .001230 PER GAL X		1590	1.96
		SUBTOTAL		1590	25.58
		TAX			.71
		TOTAL AMOUNT DUE			26.29

NETS DEPOSIT \$89.00

\*\*SOME HOMES IN YOUR COMMUNITY HAVE ELEVATED LEAD LEVELS IN THEIR DRINKING WATER. LEAD CAN POSE A SIGNIFICANT RISK TO YOUR HEALTH PLEASE READ THE ENCLOSED NOTICE FOR FURTHER INFORMATION.\*\*

BILLING DATE 11/30/94

SOUTHERN STATES UTILITIES, INC  
3033 MONUMENT RD, SUITE 12  
JACKSONVILLE, FL 32225

12510-4 12/20/94

LOCAL OFFICE PHONE 904-641-8332 OR  
CALL TOLL FREE 800-432-4501

26.29

PLANT - 886  
SCHEDULE - 028  
5085113020 01

DAVID M MYNATT  
4523 BREAKWATER ROW W  
JACKSONVILLE FL 32225-1008

04/29/98 MON 15:29 FAX 407-884 7740 SSU

DOCKET 95D495-WS  
EXHIBIT NO. 82  
CASE NO. 96-04227

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 95D495-WS EXHIBIT NO. 82

COMPANY:

WITNESS:

DATE: 11/29/96