

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for rate increase
in Duval, Nassau, and St. Johns
Counties by United Water Florida, Inc.

Docket No. 960451-WS

Filed: January 22, 1997

MOTION TO STRIKE TESTIMONY

The Citizens of the State of Florida (Citizens) by and through JACK SHREVE, Public Counsel move to strike certain rebuttal testimony filed in this docket by United Water Florida, Inc. (United) and as grounds therefore say:

1. United initiated this docket on July 30, 1996, by the filing of an application, minimum filing requirements, and testimony of several witnesses including that of Thomas F. Cleveland, Director-Capital Projects Management for United Water Management & Services Company. Mr. Cleveland caused to be prepared a schedule, TFC-1, which was included with his testimony and which is attached to this motion as Exhibit A. Exhibit A (TCF-1) was prepared by United to show all capital expenditure projects or programs which were anticipated to be completed and in service by December 31, 1997.

On November 5, 1996, the Citizens propounded interrogatory 78 to United which sought:

Plant additions. Refer to Exhibit TFC-1. For each of the projects listed on pages 1 and 2, provide the following information:

a. If in service, the actual in-service date.

ACK _____
AFA 1 _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG 1 _____
LIN 5 _____
OPC _____
RCH _____
SEC A _____
WAS Wells _____
OTH _____

DOCUMENT NUMBER-DATE
00809 JAN 22 1997
FPSC-RECORDS/REPORTING

- b. If not yet in-service, the currently estimated in-service date, if different from the date utilized in the filing.
- c. If in-service, the actual project cost.
- d. If not in-service, the actual project costs incurred to date.
- e. If not in-service, any revisions to the estimated project cost.

United's response to Interrogatory 78 shows a considerable revision to the testimony and exhibits of Mr. Cleveland. United's response is attached to this motion as Exhibit B.

- 3. United's response shows a substantial reduction to their projections of what capital projects would reach completion by the end of 1997. The Citizens relied, and were entitled to rely, upon United's presumably truthful revisions to its projections, which were furnished to the Citizens in the form of a sworn interrogatory response dated December 5, 1996.
- 4. On January 10, 1997, about thirty-five days after the interrogatory response, United filed its rebuttal testimony, including that of Thomas F. Cleveland. Mr. Cleveland's testimony and Exhibits show a \$3.25 expansion of United's projected 1997 plant additions over those identified in response to interrogatory 78. Exhibit TFC-5 is attached to this motion as Exhibit C.
- 5. Mr. Cleveland's rebuttal testimony and Exhibit also show capital projects projected to be completed by the end of 1997 which were not included in United's original filing, or in their direct testimony. Projects shown anew are listed in Exhibit D to this motion.

6. The effectiveness of the Citizens' point of entry into the administrative process depends upon their opportunity to evaluate and, where necessary, to criticize the original filing of the utility. The Citizens took the direct case filed by United, evaluated it, propounded interrogatories, and relied upon both the original filing and the interrogatory responses to prepare their (the Citizens') direct case. The Citizens filed their direct testimony in reliance of the facts represented as true by United in its direct filing, and in its discovery responses.
7. At the eleventh hour of their preparation, after their testimony was cast and filed with the commission, the Citizens learned through United's rebuttal case that there is much more to United's case than represented to them by United to that point:
- 1) That United's capital projects will exceed the interrogatory response by \$3.25 million; that a number of the projects apparently foregone by United (according to their interrogatory response) are now re-included in their projections; and
 - 2) That United's projections will include certain projects which were included neither in the original filing, nor in the interrogatory response.
8. The Commission employs a number of measures to ensure that proceedings before this commission do not amount to trial by ambush. Discovery is encouraged, if not required; there is considerable discussion among the parties and staff designed to sharpen the controverted issues of fact and law such that they may be fairly tried before the commission. The parties, including the Citizens, expend considerable resources in ensuring that each party and that the staff have a fair opportunity to evaluate and criticize the evidence of the opposing party: and all parties ought to be able to rely

upon the representations made in that process without exposure to risk of a substantial change of position for which there is no opportunity to respond.

9. The Citizens have been substantially prejudiced by the substantial revisions to projections shown in the rebuttal testimony of Thomas F. Cleveland as contrasted with the projections which were offered to the Citizens in United's response to interrogatory 78. Moreover, the Citizens have been substantially prejudiced by the substantial revisions to projections shown in the rebuttal testimony of Thomas F. Cleveland, as contrasted not only with United's response to interrogatory 78, but as contrasted with the original, direct testimony of Thomas F. Cleveland.

10. While the rebuttal testimony of Mr. Cleveland purports to be rebuttal testimony, closer examination of the testimony shows to the contrary:

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to compare the actual 1996 gross plant additions to those projected in Exhibit TFC-1 of my prefiled testimony and also compare them to those provided in response to Interrogatory #78, Public Advocate's Third Set of Interrogatories.

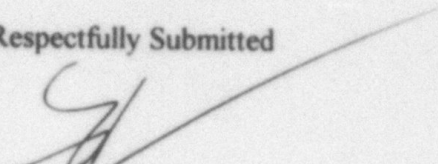
(Rebuttal testimony of Thomas F. Cleveland, p. 1)

Mr. Cleveland's testimony does not rebut any witness in this case. If it rebuts at all, it rebuts the company's direct case, and the interrogatory response provided by the company. Mr. Cleveland's purported rebuttal testimony makes no reference, express or implied, to the testimony of any other witness in this case.

11. It is manifestly unfair, and lessens the effectiveness of the Citizens' point of entry into the administrative process, to require the Citizens to evaluate and criticize a moving target. The Utility should be required to stand by its direct case, it should be held to its discovery responses; the Citizens should have a clear opportunity to evaluate and criticize the remaining case, not an expanded case which repudiates the utility's own sworn responses. Finally, rebuttal testimony should be for the purpose of rebutting the opposition's case, not ones own.

WHEREFORE, the Citizens of the State of Florida move the Prehearing Officer, or the Commission, as appropriate to strike the prefiled rebuttal testimony of Thomas F. Cleveland, and any exhibits attached thereto, in its entirety; and the Citizens move the Prehearing Officer, or the Commission for such other relief as appears appropriate in the premises.


Respectfully Submitted



Harold McLean
Associate Public Counsel
Office of the Public Counsel
111 W. Madison St.
Tallahassee, Florida 32399
Attorney for the Citizens
of the State of Florida

Certificate of Service
Docket No 960451-WS

I HEREBY CERTIFY that copies of the foregoing Motion to Strike Testimony have been furnished by U. S. Mail and by Facsimile transmission to Mr. James L. Ade, Esq., P. O. Box 59, Jacksonville Florida, and by hand delivery to Rosanne G. Capeless, Esq, 2540 Shumard Oak Blvd., Tallahassee, Florida, this 22nd day of January, 1997.



Attorney

GROSS PLANT ADDITIONS

Project Number	CBA Number	Project Description	Capital Additions (\$1,000's)	
			1996	1997
C		Prior Year Developer Projects - Water *		
D		Various New Mains		
R		Prior Year Developer Projects - Sewer *		
93G002		93013 SCADA Enhancements	1,071.0	0.0
93W002		95071 St Johns North Wastewater Treatment Plant (WWTP)	250.0	300.0
93W003		94016 San Pablo WWTP Improvements	1,861.6	0.0
94D006		94125 Yulee East	350.4	0.0
94E201		9480: Ft. Caroline Road	598.8	0.0
94G001		94030 SCADA Central Control Upgrade *	243.2	0.0
94H001		94033 St. Johns No. WTP Upgrade	0.2	0.0
94L002		94041 Geographic Information System (GIS)	5.6	0.0
94W006		95105 Royal Lakes Generator	772.7	0.0
95Z998		95998 CRS Corrections	962.3	0.0
95E204		95801 Baymeadows Rd, Florida Dept Of Transportation	3.4	0.0
95G001		95031 Replace Well Pumps (95G001)	2.5	0.0
95H001		95034 Chlorine Alarms (Water)	(48.8)	0.0
95H004		95037 A1A South Water Treatment Plant (WTP)	34.9	0.0
95L001		95046 Computer - Ponte Vedra WWTP	29.2	0.0
95L014		95128 Information Technology (IT) - Replace Datapoint	78.6	0.0
95S002		95124 Pompano Lift Station (L/S) Odor Control	(31.9)	0.0
95T500		Replacement Sewer Mains	17.5	0.0
95V015		95136 Sandy Cove L/S	11.8	0.0
95V016		95138 Conga & Golf Course L/S	5.3	0.0
95V017		95140 Monument Road L/S	75.5	0.0
95V018		95143 State Farm L/S	2.6	0.0
95V019		95146 DuPont I L/S	4.3	0.0
95V020		95148 Barnett L/S Generator	4.0	0.0
95V023		95157 Woodleigh Dr L/S	2.4	0.0
95W001		95062 Chlorine Alarms (Wastewater)	17.8	0.0
95W008		95069 Yulee WWTP Land	3.6	0.0
95W021		95110 Jax Hts Ultraviolet (UV) Disinfection System	2.6	0.0
95W024		95142 Air Drop Pipes	17.5	0.0
95W028		95156 Ponte Vedra Electrical Improvements	0.0	0.0
95W029		95154 San Jose Thickener Drive	490.9	0.0
95W030/031	95064/65	Monterey WWTP Upgrade	48.1	0.0
96C		Developer Projects - Water *	5.1	0.0
96F001		St. Johns North WTP Well Upgrade	15.3	0.0
96H001		New Yulee West WTP *	9,477.6	1,600.0
96H002		Ponte Vedra WTP Upgrade	60.0	540.0
96H003		Residual Chlorine Monitoring at Wheat Road WTP	50.0	0.0
96H004		Hydrogen Sulfide Treatment	0.0	1,001.0
96H005		Ortega Hills WTP Upgrade	65.0	0.0
96J001		New Ground Storage Tank for San Jose WTP	7.0	0.0
96J002		Repl. Lake Forest WTP Ground Storage Tank Roof	300.0	0.0
96J003	96025	Rehab. Wheat Road WTP Ground Storage Tank	150.0	0.0
96L001		Safety Equipment	435.0	0.0
96L002		Maintenance Department Equipment	38.2	0.0
96L003		Hurricane Plan - Business Recovery	65.0	0.0
96L004		Tilt Bed Trailer for Maintenance Equipment	40.0	0.0
96L005		IT - Hardware/Software Upgrade	15.0	0.0
			25.0	0.0
			0.0	0.0
			85.0	0.0

Exhibit A, p. 1 of 3

Gross Plant Additions And
Associated Advances/Contributions
To Be Placed In Service 1996 and 1997

Page 2 of 3

GROSS PLANT ADDITIONS

Project Number	CEA Number	Project Description	Capital Additions (\$1,000's)	
			1996	1997
96L006		Operational Data Base System	150.0	0.0
96L008		Laboratory Information Management System	20.0	0.0
96L009		Add GIS to Mapping System	50.0	0.0
96L		IT - IFMS/CIS, Technical Architecture	831.6	1,532.8
96R		Developer Projects	72.0	1,128.0
96S		Sun Ray Interconnection	300.0	0.0
96S001		Ortega Hills WWTP Phase Out	0.0	1,000.0
96S002		Monument Rd Force Main (FM) - City Road Project	0.0	220.0
96W		San Pablo WWTP Generator	160.0	0.0
96W		San Pablo WWTP Office	160.0	0.0
96W001		San Jose WWTP Upgrade	255.2	0.0
96W002		Holly Oaks WWTP Upgrade	0.0	2,540.2
96W003		Jax Heights WWTP Upgrade	600.0	0.0
96W004		Royal Lakes WWTP Upgrade	205.2	0.0
96W005	9604	San Pablo WWTP Upgrade	200.3	0.0
96/97A001	001	New Services - Water *	490.0	350.0
96/97A003	003	Fire Services - Water *	15.0	15.0
96/97A500	004	Replacement Services - Water	300.0	300.0
96/97B001	005	New and Replacement Meters *	195.0	175.0
96/97D001	007	New Hydrants *	25.0	25.0
96/97D002		New Short Mains & Valves	25.0	25.0
96/97E001	009	Replacement Hydrants	15.0	15.0
96/97E002		Replacement Short Mains & Valves	50.0	50.0
96/97E200		Repl. Mains - DOT, City Road Proj's	675.0	620.0
96/97E500		Replacement Mains for 2" & 3" Galvanized Steel	620.0	1,000.0
96/97G001		Replace Two Well Pumps	30.0	30.0
96/97G002		Replace High Service Pumps	10.0	10.0
96/97G003		Replace Generator Diesel Storage Tanks	45.0	90.0
96/97G004		Water System Pressure Monitoring	20.0	20.0
96/97Q001		New Sewer Laterals *	310.0	300.0
96/97Q003		New S.T.E.P. Laterals *	90.0	90.0
96/97Q500		Replacement Sewer Laterals	530.0	530.0
96/97T200		Repl. Mains - DOT, City Road Proj's	100.0	700.0
96/97T500		T 500 Account	750.0	750.0
96/97V500		Lift Station Upgrades	150.0	250.0
97C		Developer Projects - Water *	0.0	50.0
97F001		New Monument Road WTP Well	0.0	135.0
97H		Arch/Struct WTP Upgrade	0.0	50.0
97H		Hydrogen Sulfide Treatment	0.0	300.0
97H		Lofton Oaks WTP	0.0	500.0
97H		Residual Chlorine Monitoring	0.0	7.0
97H		Anticipated Miscellaneous Water Treatment Projects	0.0	50.0
97J		New Monument Road WTP Ground Storage Tank	0.0	225.0
97J		New St. Johns North WTP Ground Storage Tank	0.0	120.0
97L		Safety Equipment	0.0	40.0
97R		Developer Projects - Sewer *	0.0	36.0
97S		Anticipated Sewer Replacements	0.0	75.0
97V		Lift Station Generators	0.0	100.0
97W		Ponte Vedra WWTP Upgrade	0.0	3,375.0
97W		San Pablo WWTP Upgrade	0.0	300.0
TOTAL ADDITIONS			27,167.2	22,568.0

* Indicates projects totally or partially funded through
Contributions In Aid Of Construction (See last page).

Exhibit A, p 2 of 3

Gross Plant Additions And
 Associated Advances/Contributions
 To Be Placed In Service 1996 and 1997

ADVANCES & CONTRIBUTIONS

Project Number	CEA Number	Project Description	Advances/Contributions (\$1,000's)	
			1996	1997
A&C - A		A. SERVICES		
A&C - B		B. METERS	454.0	225.0
A&C - C		C. PRIOR YEAR DEVELOPER PROJECTS	44.1	35.0
A&C - C		C. 1996 DEVELOPER PROJECTS	840.6	0.0
A&C - C		C. 1997 DEVELOPER PROJECTS	60.0	540.0
A&C - D		D. NEW MAINS & HYD'S	0.0	65.0
A&C - H		H. WATER TREATMENT	25.0	14.0
A&C - M		M. CONNECTION FEES - WATER	500.0	800.0
A&C - Z		Z. CRS CORRECTIONS	110.0	115.0
TOTAL A&C - WATER			(5.2)	0.0
			2,028.5	1,794.0
A&C - Q		Q. SEWER LATERALS		
A&C - R		R. PRIOR YEAR DEVELOPER PROJECTS	332.5	170.0
A&C - R		R. 1996 DEVELOPER PROJECTS	1,463.8	0.0
A&C - R		R. 1997 DEVELOPER PROJECTS	60.0	940.0
A&C - X		X. CONNECTION FEES - SEWER	0.0	78.0
TOTAL A&C - SEWER			250.0	260.0
			2,106.3	1,448.0

PROJECTED 1998 GROSS EXPENDITURES = \$15.1 MILLION

PROJECTED 1999 GROSS EXPENDITURES = \$12.4 MILLION

Exhibit A, p. 3 of 3

PUBLIC COUNSEL'S THIRD SET OF
INTERROGATORIES
TO UNITED WATER FLORIDA INC.
DOCKET NO. 960451-WS

REQUEST NO. 78:

Plant Additions. Refer to Exhibit TFC-1. For each of the projects listed on pages 1 and 2, provide the following information:

- a. If in service, the actual in-service date.
- b. If not yet in-service, the currently estimated in-service date, if different from the date utilized in the filing.
- c. If in-service, the actual project cost.
- d. If not in-service, the actual project costs incurred to date.
- e. If not in-service, any revisions to the estimated project cost.

RESPONSE:

Please see the attached information.

Witness: Thomas Cleveland
Director-Capital Project Management
United Water M&S
200 Old Hook Road
Harrington Park, NJ 07640
(201) 767-2862

Exhibit B, p 1 of 4

Exhibit B p. 284

United Water Florida
Plant Additions and Associated
Advances/Contributions
1996 - 1997

GROSS PLANT ADDITIONS

Project Number	CEA Number	Project Description	Projected Plant Addition For Exhibit TFC-1 1996	Projected Plant Addition For Exhibit TFC-1 1997	Current Projected Plant Addition 1996	Current Projected Plant Addition 1997	Portion Spent Thru 12/96	Actual Plant Addition Thru 12/97	Actual Month In Service	Projected Month In Service
C		Various Prior Year Developer Projects - Water *	1,071.8	-	919.1	-	731.6	548.4	Various	Various
960		Various New Mains	250.0	-	7.6	-	6.9	-	Various	Various
970		Various New Mains (97D100)	-	300.0	-	100.0	-	-	-	12/97
R		Various Prior Year Developer Projects - Sewer *	1,861.6	-	1,707.0	-	1,474.9	88.6	Various	Various
930001	93013	SCADA Enhancements	350.4	-	350.4	-	318.7	-	-	12/96
930002	93071	St Johns North Wastewater Treatment Plant (WWTP)	598.8	-	598.8	-	262.9	262.9	11/95	-
930003	94016	San Pablo WWTP Generator	243.2	-	191.3	-	191.3	191.3	9/96	-
940006	94123	Yulee East	0.3	-	0.3	-	0.3	0.3	9/95	-
940001	94801	Ft. Caroline Road	5.6	-	6.7	-	6.7	6.7	9/95	-
940001	94030	SCADA Control Control Upgrade	772.7	-	772.7	-	495.8	-	-	12/96
940001	94033	St. Johns Nn. WTP Upgrade	962.3	-	962.3	-	913.6	-	-	12/96
940002	94041	Geographic Information System (GIS)	3.4	-	3.4	-	3.4	3.4	12/95	-
940006	95103	Royal Lakes Generator	2.5	-	2.5	-	2.5	2.5	12/95	-
952006	95998	CRS Corrections	(48.8)	-	-	-	-	-	-	-
95E204	95801	Baymeadows Rd, Florida Dept Of Transportation	34.9	-	38.5	-	38.5	38.5	3/96	-
950001	95031	Replace Well Pumps (950001)	29.2	-	29.2	-	29.2	29.2	1/96	-
951001	95034	Chlorine Alarms (Water)	78.6	-	40.9	-	40.9	40.9	3/96	-
951004	95037	A1A South Water Treatment Plant (WTP)	(31.9)	-	(31.9)	-	(31.9)	(31.9)	8/95	-
951001	95046	Computer - Ponte Vedra WWTP	17.5	-	17.5	-	17.5	17.5	1/96	-
951014	95128	Information Technology (IT) - Replace Database	11.8	-	11.8	-	11.8	11.8	12/95	-
951002	95134	Pompano LIR Station (L/S) Odor Control	5.3	-	5.3	-	5.3	5.3	11/95	-
951500		Various Replacement Sewer Mains	76.6	-	77.9	-	77.7	77.7	3/96	-
95VB03	95136	Sandy Cove L/S	2.8	-	2.1	-	2.1	2.1	12/95	-
95VB16	95138	Conga & Golf Course L/S	4.3	-	4.3	-	4.2	4.2	12/95	-
95VB17	95140	Monument Road L/S	4.0	-	4.0	-	4.0	4.0	12/95	-
95VB18	95143	State Farm L/S	2.4	-	-	-	-	-	12/95	-
95VB19	95146	DePaul L/S	17.8	-	19.7	-	19.7	19.7	11/95	-
95VB20	95148	Barnett L/S Generator	3.6	-	2.4	-	2.4	2.4	1/96	-
95VB23	95157	Woodleigh Dr L/S	2.6	-	2.6	-	2.5	2.5	7/96	-
95WB01	95062	Chlorine Alarms (Wastewater)	17.3	-	15.3	-	15.3	15.3	3/96	-
95WB08	95069	Yulee WWTP Land	-	-	1,175.7	-	1,175.7	1,175.7	4/96	-
95WB21	95110	Jac. 's Ultraviolet (UV) Disinfection System	490.9	-	528.3	-	528.3	528.3	2/96	-
95WB24	95142	Air Drop Pipes	48.1	-	31.3	-	31.3	31.3	2/96	-
95WB28	95156	Ponte Vedra Electrical Improvements	5.1	-	4.0	-	4.0	4.0	6/96	-
95WB29	95154	San Jose Thickener Drive	15.3	-	15.3	-	15.3	15.3	1/96	-
95WB30	95064/65	Monterey WWTP Upgrade	9,477.6	1,600.0	9,477.6	1,600.0	8,202.8	-	-	12/96
96C		Various Developer Projects - Water *	60.0	540.0	60.0	540.0	3.8	-	Various	Various
961001		St. Johns North WTP Well Upgrade	50.0	-	-	-	-	-	-	1/98
961001		New Yulee West WTP *	-	1,001.0	-	1,180.0	-	-	-	12/97
961002		Ponte Vedra WTP Upgrade	65.0	-	-	325.0	-	-	-	12/97
961003		Residual Chlorine Monitoring at Wheat Road WTP	7.0	-	-	7.0	-	-	-	12/96
961004	96022	Hydrogen Sulfide Treatment, Monument Road	300.0	-	-	321.8	-	-	-	12/97
961005		Omega Hills WTP Upgrade	150.0	-	-	150.0	-	-	-	6/97
961001	96024	New Ground Storage Tank for San Jose WTP	435.0	-	-	589.5	41.4	-	-	3/97
961002	96028	Repl. Lake Forest WTP Ground Storage Tank Roof	38.2	-	38.2	-	6.3	-	-	12/96
961003	96026	Rehab. Wheat Road WTP Ground Storage Tank	65.0	-	65.3	-	-	-	-	12/96
96L001	96027	Safety Equipment	40.0	-	15.7	-	-	-	-	12/96
96L002	96025	Maintenance Department Equipment	15.0	-	9.3	-	4.6	-	-	12/96

GROSS PLANT ADDITIONS

Project Number	CEA Number	Project Description	Projected Plant Addition Per Exhibit TFC-1 1996	Projected Plant Addition Per Exhibit TFC-1 1997	Current Projected Plant Addition 1996	Current Projected Plant Addition 1997	Portion Spent Thru 10/96	Actual Plant Addition Thru 10/97	Actual Month in Service	Project Month in Service
96L003	96029	Hurricane Plan - Business Recovery	23.0	-	23.0	-	-	-	-	12/9
96L004		Tilt Bed Trailer for Maintenance Equipment	-	-	-	-	-	-	-	12/9
96L005	96032	IT - Hardware/Software Upgrade	83.0	-	101.9	-	44.0	-	-	3/9
96L006		Operational Data Base System	150.0	-	-	58.8	-	-	-	3/9
96L008		Laboratory Information Management System	20.0	-	-	20.0	-	-	-	6/9
96L009	96035	Add GIS to Mapping System	50.0	-	-	66.3	-	-	-	1/9
96L910	96930	IT - Technical Architecture (Water)	231.5	-	-	194.1	94.2	-	-	1/9
96L951	96951	IT - CIS (Water)	-	387.7	-	353.9	120.7	-	-	1/9
97L		IT - CIS (Water) Phase 2	-	160.0	-	-	-	-	-	1/9
96L952	96952	IT - IFMS Budgeting System (Water)	47.1	-	-	42.8	20.6	-	-	1/9
96L953	96953	IT - IFMS General Ledger (Water)	86.9	-	-	74.6	51.8	-	-	1/9
96L954	96954	IT - IFMS Time Entry/Payroll (Water)	38.2	-	-	88.1	24.0	-	-	1/9
96L955	96955	IT - IFMS Procurement System (Water)	-	220.1	-	106.6	50.9	-	-	1/9
96L956	96956	IT - IFMS Project Costing/Fixed Asset System (Water)	-	83.6	-	68.8	23.6	-	-	1/9
96L960	96960	IT - Technical Architecture (Sewer)	212.5	-	-	178.2	86.5	-	-	1/9
96L961	96961	IT - CIS (Sewer)	-	297.0	-	271.0	92.4	-	-	1/9
97L		IT - CIS (Sewer) Phase 2	-	125.0	-	-	-	-	-	1/9
96L962	96962	IT - IFMS Budgeting System (Sewer)	62.0	-	-	52.8	25.4	-	-	1/9
96L963	96963	IT - IFMS General Ledger (Sewer)	106.6	-	-	92.1	63.9	-	-	1/9
96L964	96964	IT - IFMS Time Entry/Payroll (Sewer)	46.8	-	-	108.7	29.3	-	-	1/9
96L965	96965	IT - IFMS Procurement System (Sewer)	-	156.8	-	131.6	62.8	-	-	1/9
96L966	96966	IT - IFMS Project Costing/Fixed Asset System (Sewer)	-	102.5	-	84.8	29.1	-	-	1/9
96R		Various Developer Projects	72.0	1,128.0	72.0	1,128.0	6.7	-	Various	Various
96S		San Ray Interconnection	300.0	-	-	300.0	-	-	-	12/9
96S001		Ortega Hills WWTP Phase Out	-	1,000.0	-	800.0	-	-	-	12/9
96S002		Monument Rd Force Main (FM) - City Road Project	-	220.0	-	380.0	-	-	-	12/9
96W		San Pablo WWTP Generator	160.0	-	-	-	-	-	-	12/9
96W016	96121	San Pablo WWTP Operations Building	160.0	-	134.1	-	-	-	-	12/9
96W001	96038	San Jose WWTP Upgrade	235.2	-	5.4	-	5.4	5.4	9/96	-
96W002		Helly Oaks WWTP Upgrade	-	2,540.2	-	2,500.0	-	-	-	12/9
96W003	96040	Jos Heights WWTP Upgrade	600.0	-	134.0	-	18.0	-	-	12/9
96W004		Royal Lakes WWTP Upgrade	205.2	-	-	-	-	-	-	12/9
96W005	96042	San Pablo WWTP Upgrade	200.3	-	200.0	-	170.6	-	-	12/9
96A001	96001	New Services - Water *	490.0	-	300.0	-	251.4	251.4	3/96	-
97A001		New Services - Water (97F001) *	-	350.0	-	240.0	-	-	-	1/97
96A003	96003	Fire Services - Water *	15.0	-	15.0	-	6.8	6.8	2/96	-
97A003		Fire Services - Water (97F003) *	-	15.0	-	13.0	-	-	-	1/97
96A300	96004	Replacement Services - Water	300.0	-	400.0	-	393.6	393.6	2/96	-
97A300		Replacement Services - Water (97F301)	-	300.0	-	470.0	-	-	-	1/97
96D001	96005	New and Replacement Meters *	195.0	-	200.0	-	196.3	196.3	2/96	-
97D001		New and Replacement Meters (97G001, 97G501) *	-	175.0	-	160.0	-	-	-	1/97
96D001	96007	New Hydrants *	25.0	-	25.0	-	15.9	15.9	5/96	-
97D001		New Hydrants (97D001) *	-	25.0	-	25.0	-	-	-	1/97
96D002	96008	New Short Mains & Valves	25.0	-	25.0	-	17.0	17.0	3/96	-
97D002		New Short Mains & Valves (97D002)	-	25.0	-	20.0	-	-	-	1/97
96E001	96009	Replacement Hydrants	15.0	-	20.0	-	18.6	18.6	3/96	-
97E001		Replacement Hydrants (97D501)	-	15.0	-	25.0	-	-	-	1/97
96E002	96010	Replacement Short Mains & Valves	50.0	-	70.0	-	61.0	61.0	5/96	-
97E002		Replacement Short Mains & Valves (97D502)	-	50.0	-	50.0	-	-	-	1/97
96I200		Repl. Mains - DOT, City Road Proj	675.0	-	17.1	-	16.7	-	-	12/96
97E200		Repl. Mains - DOT, City Road Proj (97D700)	-	620.0	-	500.0	-	-	-	12/97
96E300		Replacement Mains for 2" & 3" Galvanized Steel	620.0	-	792.8	-	666.4	341.6	Various	Various
97E300		Replacement Mains for 2" & 3" Galvanized Steel (97I600)	-	1,000.0	-	800.0	-	-	-	12/97

Exhibit B, p 384

Docket No. 960451-WS
Exhibit (HL-1)
Schedule 7-C
Page 3 of 4

GROSS PLANT ADDITIONS

Project Number	CEA Number	Project Description	Proposed Plant Addition Per Exhibit TFC-1 1996	Projected Plant Addition Per Exhibit TFC-1 1997	Current Projected Plant Addition 1996	Current Projected Plant Addition 1997	Portion Spent Thru 1996	Actual Plant Addition Thru 1997	Actual Month In Service	Projected Month In Service
96Q001		Replace Two Well Pumps								
97Q001		Replace Two Well Pumps (97C001)	30.0	-	-	-	-	-	-	N/A
96Q002	96016	Replace High Service Pumps	-	30.0	-	-	-	-	-	12/96
97Q002		Replace High Service Pumps (97C002)	10.0	-	7.5	30.0	-	-	-	12/97
96Q003	96017	Replace Generator Diesel Storage Tanks	-	10.0	-	-	7.5	-	-	12/96
97Q003		Replace Generator Diesel Storage Tanks (97C003)	45.0	-	89.6	-	-	-	-	12/97
96Q004		Water System Pressure Monitoring	-	90.0	-	-	-	-	-	12/96
97Q004		Water System Pressure Monitoring (97C004)	20.0	-	-	40.0	-	-	-	12/97
96Q001	96011	New Sewer Laterals *	-	20.0	-	-	-	-	-	-
97Q001		New Sewer Laterals (97H001) *	310.0	-	-	20.0	-	-	-	-
96Q003	96013	New S.T.E.P. Laterals *	-	300.0	-	180.0	150.0	130.0	5/96	-
97Q003		New S.T.E.P. Laterals (97H002) *	90.0	-	40.0	190.0	-	-	-	1/97
96Q300	96012	Replacement Sewer Laterals	-	90.0	-	-	32.8	32.8	5/96	-
97Q300		Replacement Sewer Laterals (97H301)	330.0	-	300.0	90.0	-	-	-	1/97
96T200		Repl. Mains - DOT, City Road Proj's	-	530.0	-	-	245.1	245.1	5/96	-
97T200		Repl. Mains - DOT, City Road Proj's (97P200)	100.0	-	-	390.0	-	-	-	1/97
96T300		Various T 300 Account	-	700.0	-	16.6	16.6	5/96	-	-
97T300		T 300 Account - Replacement Mains (97P600)	730.0	-	644.4	300.0	-	-	-	12/97
96V300		Lift Station Upgrades	-	750.0	-	494.0	350.0	321.6	Various	Various
97V300		Lift Station Upgrades (97Q300)	130.0	-	270.9	550.0	-	-	-	12/97
97C		Developer Projects - Water (97D300) *	-	250.0	-	-	31.1	24.7	Various	Various
97F001		New Monument Road WTP Well	-	50.0	-	350.0	-	-	-	12/97
97II		Arch/Struct WTP Upgrade	-	135.0	-	50.0	-	-	-	12/96
97II		Hydrogen Sulfide Treatment, Royal Lakes (97D001)	-	50.0	-	-	-	-	-	1998
97II		Lafon Oaks WTP (97D001)	-	300.0	-	-	-	-	-	-
97II		Residual Chlorine Monitoring	-	500.0	-	220.0	-	-	-	12/97
97II		Anticipated Miscellaneous Water Treatment Projects	-	7.0	-	-	-	-	-	1998
97J		New Monument Road WTP Ground Storage Tank (97E003)	-	50.0	-	-	-	-	-	12/97
97J		New St. Johns North WTP Ground Storage Tank (97E001)	-	225.0	-	225.0	-	-	-	12/97
97L		Safety Equipment - Water (97K003)	-	120.0	-	250.0	-	-	-	12/97
97R		Developer Projects - Sewer (97P300) *	-	40.0	-	20.0	-	-	-	12/97
97S		Anticipated New Sewers (97P100)	-	36.9	-	36.0	-	-	-	6/97
97V		Lift Station Generators	-	75.0	-	-	-	-	-	12/97
97W		Ponte Vedra WWTP Upgrade	-	100.0	-	50.0	-	-	-	12/97
97W		San Pablo WWTP Upgrade - UV System (97R004)	-	3,376.0	-	-	-	-	-	-
TOTAL ADDITIONS				300.0		330.0				1999
Totals As Incorrectly Shows On Orig Exhibit =			35,171.3	20,571.0	21,267	17,883	18,184	5,988.1		12/97
			27,167.2	22,568.0						

Exhibit B, p. 4/14

Docket No. 960451-W
Exhibit (HL-1)
Schedule 7-C
Page 4 of 4

**Plant Additions and Associated
Advances/Contributions & Retirements
1997**

Handwritten: 6/14/97
P. B. C.

Project Number	CEA Number	Project Description	Actual Month In Service	Projected Month In Service	1997 Gross Budget	Estimated Project Total	Actual Expend. Thru 12/96	Anticipated Plant Addition Thru 12/97	Anticipated Plant Additions 1997											
									JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC

ADVANCES & CONTRIBUTIONS

Project Number	CEA Number	Project Description	Thru 12/97															
AAC - A	A. SERVICES		223.0	18.0	18.0	18.0	19.0	19.0	19.0	19.0	19.0	19.0	19.0	19.0	19.0	19.0	19.0	19.0
AAC - B	B. METERS		30.0		3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0
AAC - C	C. PRIOR YEAR DEVELOPER PROJECTS		453.3	30.0	80	45	50.1	75	55	85.2	48	24						
AAC - C	C. 1997 DEVELOPER PROJECTS		300.0				75.0			75.0								
AAC - D	D. NEW MAINS & HYD'S		14.0		1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4
AAC - H	H. WATER TREATMENT		540.0				540.0											
TOTAL AAC - WATER			1,563.3	48.0	82.4	608.4	148.5	98.4	78.4	163.4	73.4	47.4	98.4	33.4	93.0			

ADVANCES & CONTRIBUTIONS

Project Number	CEA Number	Project Description	Thru 12/97															
AAC - Q	Q. SEWER LATERALS		215.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0	18.0
AAC - R	R. PRIOR YEAR DEVELOPER PROJECTS		420.0	44.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0
AAC - R	R. 1997 DEVELOPER PROJECTS		1,000.0		168.0	168.0	168.0	168.0	168.0	168.0	168.0	168.0	168.0	168.0	168.0	168.0	168.0	168.0
AAC - S	S. NEW SEWER MAINS		300.0				300.0			300.0								
AAC - X	X. CONSTRUCTION FEES - SEWER		300.0		26.0	26.0	26.0	26.0	26.0	26.0	26.0	26.0	26.0	26.0	26.0	26.0	26.0	26.0
TOTAL AAC - SEWER			1,804.8	62.0	247.0	247.0	247.0	247.0	247.0	247.0	247.0	247.0	247.0	247.0	247.0	247.0	247.0	247.0

Item	Year Installed	Auth or W.O.#	Size of Yrds	Disposition	Retirement Amount
93W3093 936495 Monterey WWTP Upgrade	1977	229726	Cost	Scrap	963,312
93V385 94695 Carleton West L.S.	unk	unk	Est.	Scrap	14,000
943061	Ontario Hills WWTP Phase Out	unk	unk	Est.	260,000
97A300	Replacement Services - Water (97F361)	Value	unk	Est.	25,212
97B061	Replacement Meters (97G361)	Value	unk	Est.	5,700
97E300	Replacement Mains for 2" & 3" Galvanized Steel (97D400)	Value	unk	Est.	18,130
97Q300	Replacement Sewer Laterals (97N301)	Value	unk	Est.	28,170
97T300	T 300 Account - Replacement Mains (97F600)	Value	unk	Est.	8,000
					1,307,544

Item	Year Installed	Auth or W.O.#	Size of Yrds	Disposition	Retirement Amount
93W3093 936495 Monterey WWTP Upgrade					325,000
93V385 94695 Carleton West L.S.					9,700
943061	Ontario Hills WWTP Phase Out				25,000
97A300	Replacement Services - Water (97F361)				0
97B061	Replacement Meters (97G361)				0
97E300	Replacement Mains for 2" & 3" Galvanized Steel (97D400)				0
97Q300	Replacement Sewer Laterals (97N301)				0
97T300	T 300 Account - Replacement Mains (97F600)				0
					359,700

Item	Year Installed	Auth or W.O.#	Size of Yrds	Disposition	Retirement Amount
93W3093 936495 Monterey WWTP Upgrade					0
93V385 94695 Carleton West L.S.					0
943061	Ontario Hills WWTP Phase Out				0
97A300	Replacement Services - Water (97F361)				0
97B061	Replacement Meters (97G361)				771
97E300	Replacement Mains for 2" & 3" Galvanized Steel (97D400)				0
97Q300	Replacement Sewer Laterals (97N301)				0
97T300	T 300 Account - Replacement Mains (97F600)				0
					381.0

Handwritten:
C
H
G
H
H
H

**Plant Additions and Associated
Advances/Contributions & Retirements
1997**

Project Number	CEA Number	Project Description	Actual Month in Service	Projected Month in Service	1997 Cross Budget	Estimated Project Total	Actual Expend. Thru 12/26 771	Anticipated Plant Addition Thru 12/27	Anticipated Plant Additions 1997											
									JAN	FEB	MAR	APR 363.8	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV 386.8	DEC

Projects introduced to the case by rebuttal testimony

<u>Project</u>		<u>Amount</u>
<u>Number</u>	<u>Project Description</u>	
96L012	Replace Signs	21,200
96L103	Computer Support Equipment	10,600
96M002	Monterey WWTF Lots 27 & 28 Acquisition	17,000
96W015	Jax Heights operations Building	186,800
96W016	San Pablo WWTP Operations Building	10,000
96W020	Royal Lakes WWTP Handrails	7,200
96W025	Ponte Vedra WWTF Site Work	18,600
97H	Disinfection - Tablets	20,000
97J	Marshview WTP Tanks	270,000
	Royal Lakes city Interconnection	240,000
	Yulee Welcome Station Force Main	980,000
97W	Sunray North WWTP Upgrade	<u>280,000</u>
	TOTAL	<u>2,061,400</u>