

ORIGINAL

STATE OF FLORIDA

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DIVISION OF WATER & WASTEWATER
CHARLES H. HILL
DIRECTOR
(850) 413-6900

Public Service Commission

February 23, 1998

Dwight T. Jenkins, Esq., P.G.
Director, Division of Water Use Regulation
Department of Resource Management
St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178-1429

Re: Docket No. 971186-SU: Application for approval of reuse project plan and increase in wastewater rates in Seminole County by Sanlando Utilities Corporation

Dear Mr. Jenkins:

Thank you for your letter of February 11, 1998. The purpose of this letter is to ask some follow-up questions based on the responses contained in your letter. Specifically, please respond to the following:

1. According to your response to Question 2, the Sabal Point Country Club has not submitted the required costs estimates. To your knowledge, why haven't the estimates been provided and when are they expected? When you receive the estimates, could you please forward a copy to the Public Service Commission?
2. According to your response to Question 3, the Wekiva Golf Course has not submitted the required annual reports. To your knowledge, why haven't the reports been provided and when are they expected? When you receive the reports, could you please forward a copy to the Public Service Commission?
3. According to your response to Question 9, permittees have the obligation to provide information, usually in the form of an economic feasibility study, demonstrating that the applicant would not be able, financially, to continue in operation if it were required to use reclaimed water. Have any of the potential reuse customers (Sabal Point Country Club, Wekiva Golf Course, Sweetwater Country Club, and Lake Brantley Plant Corp.) provided a feasibility study to the SJRWMD regarding their financial ability to receive reuse from Sanlando? If so, please provide a copy. If not, when are the studies expected to be filed?

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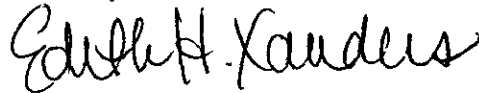
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4. Once reclaimed water is available and the reuse customers are required to accept it, will the SJRWMD require the reuse customers to discontinue use of their own wells? If not, how will the WMD ensure that the reuse customers do not continue to use their own wells for irrigation?

In addition, I am enclosing a copy of a May 8, 1992 letter from Naomi Whitney to the Public Service Commission regarding the SJRWMD's intent to require the Sabal Point Country Club, Wekiva Golf Course, and Sweetwater Country Club to accept reclaimed water if Sanlando Utilities Corporation (Sanlando) makes the reclaimed water available. According to the letter, the SJRWMD will require the three golf courses to accept reclaimed water provided that the reclaimed water is provided at reasonable cost and that any necessary irrigation system renovations are financially feasible. Is this still the SJRWMD's position? If so, please provide a response indicating that the SJRWMD will require the three golf courses, as well as the Lake Brantley Plant Corp. to take reuse when it becomes available.

We appreciate the SJRWMD's efforts to work with us in this case and request that you provide a response by March 9, 1998. I look forward to meeting with you in Orlando.

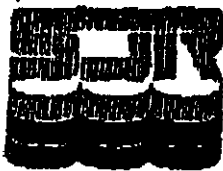
Sincerely,



Edith H. Xanders
Regulatory Analyst IV
Bureau of Special Assistance

EHX:ehx
Enclosure

cc: Division of Water and Wastewater (Hill, Willis, Rendell, Casey, Moniz, Crouch, Bethea, Golden, Rieger)
Division of Legal Services (Gervasi)
✓ Division of Records and Reporting
Jennifer B. Springfield, Esq.
Cleatous J. Simmons, Esq.
Stephen C. Reilly, Esq.



**WATER
MANAGEMENT
DISTRICT**

Henry Dean, Executive Director
John R. Webb, Assistant Executive Director

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May 8, 1992

Mr. Thomas Beard, Chairman
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0851

Dear Mr. Beard:

I have been asked to formally respond to your letter of December 12, 1991, to Henry Dean, regarding reuse in connection with Sanlando Utilities Corporation in Seminole County. I have already conveyed most of the following information verbally to Ms. Patti Daniel in your Division of Water and Wastewater.

In your letter, you reference three golf courses in the vicinity of Sanlando Utilities, namely Sabal Point, Sweet Water Oaks and Wekiva Golf Club, and ask whether the District will require these golf courses to accept reclaimed water if Sanlando makes it available. The answer is yes, provided that the reclaimed water is provided at a reasonable cost and that any necessary irrigation system renovations are financially feasible for the golf courses to make (i.e., that the use of the reclaimed water is economically feasible).

As you note in your letter, each of the golf courses' consumptive use permits contains a specific condition requiring them to accept reclaimed water when it becomes available, as long as it is environmentally, technologically and economically feasible. The District is prepared to enforce this condition. As evidence of the District's commitment to enforce its CUP reuse conditions is the example of Vero Beach. In this case, the District had placed reuse conditions on three golf courses in the vicinity of the City of Vero Beach's Waste Water Treatment Plant (NWTP). When DER recently disallowed Vero Beach to discharge their effluent to surface waters, the District activated the golf courses' reuse conditions. A notification letter to the golf courses from the District was followed by a series of meetings, which recently resulted in the City of Vero Beach successfully negotiating contracts with all three golf courses.

To facilitate matching potential reuse suppliers with reclaimed water users, and in fulfillment of the requirements in Chapter 17-40.401(5) F.A.C., the District has now designated by rule the entire District as a "Water Conservation Area" (also known as a Critical Water Supply Problem Area). This rule becomes effective May 20, 1992. As a result of this designation, wastewater plants

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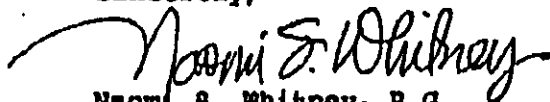
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located within the District, such as Sanlando, must explore reuse as an effluent disposal option as part of their effluent discharge permit evaluation process. In anticipation of this rule, last year we issued the three golf courses permits with four year durations, rather than the more typical seven year durations. Thus, the CUP permits would expire at the same time that Sanlando's surface water discharge permit would be up for renewal, further enhancing the opportunity for reclaimed water reuse to become a reality.

The bottom line is the District is prepared to stand by the reuse conditions we placed on the Sweetwater Oaks, Sabal Point and Nekiva Golf Club CUP permits. Further, we are extremely supportive of the PSC proposal to require Sanlando to use any excess earnings to develop a system to provide reclaimed water to the golf courses, or to other potential recipients.

We appreciate the Commissions' level of interest in reuse and look forward to being active, supportive partners in achieving our joint conservation goals.

Sincerely,



Naomi S. Whitney, P.G.
Assistant Department Director
Department of Resource Management

cc: Henry Dean
Jeff Elledge

NSW/cj