

SCANNED ORIGINAL

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August 25, 1998

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VIA FEDERAL EXPRESS

Ms. Blanca Bayo, Director  
Department of Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Application for Rate Increase in Duval, St. Johns and Nassau  
Counties by United Water Florida Inc., Docket No. 980214-WS

Dear Ms. Bayo:

In response to the July 24, 1998, letter from Bobbie L. Reyes in connection with the Application of United Water Florida Inc. for Rate Adjustment, Docket No. 980214-WS, enclosed are an original and five (5) copies of United Water Florida Inc.'s Response to Florida Public Service Commission Data Request Dated July 24, 1998 ("Response").

On Friday, August 21, 1998, I discussed transmitting the Response after Monday, August 24, 1998, with Samantha McRae, a Staff Attorney for the Florida Public Service Commission. I would appreciate your distributing the enclosed copies of the Response in accordance with your established procedures.

If you have any questions or need additional information concerning this matter, please do not hesitate to call me.

Sincerely yours,

Scott G. Schildberg

- ACK \_\_\_\_\_
- AFA 1
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG cover it only \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC cover it only \_\_\_\_\_
- WAS (circled) \_\_\_\_\_
- OTH \_\_\_\_\_

SGS/dws  
Enclosures

- cc: Mr. Robert J. Iacullo
- Mr. Walton F. Hill
- Mr. Jack Schreyer (2 sets)
- Mr. Gary R. Moseley (2 sets)
- Mr. Munipalli Sambamurthi
- Mr. Harold McLean (2 sets)
- Ms. Bobbi L. Reyes

Response  
DOCUMENT NUMBER-DATE

09291 AUG 26 88

FPSC-RECORDS/REPORTING

Conservation Plan  
DOCUMENT NUMBER-DATE

09292 AUG 26 88

FPSC-RECORDS/REPORTING

Reuse Feasibility Study  
DOCUMENT NUMBER-DATE  
093 AUG 26 88

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of United Water )  
Florida Inc. for Increased Water )  
and Wastewater Rates in Duval, )  
Nassau and St. Johns Counties )  

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DOCKET NO. 980214-WS

UNITED WATER FLORIDA INC.'S RESPONSE  
TO FLORIDA PUBLIC SERVICE COMMISSION  
DATA REQUEST DATED JULY 24, 1998

State of Florida  
Public Service Commission  
Docket No. 980214-WS  
Staff Data Request-2nd Set

QUESTION 1:

Please provide copies of all reports and reviews for UWF and United Waterworks Inc. prepared by or for investment banking firms from January 1, 1997 through the present.

RESPONSE 1:

There have been no reports prepared by or for either United Water Florida or United Waterworks Inc. from January 1, 1997, through the present.

State of Florida  
Public Service Commission  
Docket No. 980214-WS  
Staff Data Request-2nd Set

QUESTION 2:

Please provide copies of all reports and analyses for UWF and United Waterworks Inc. prepared by Standard & Poor's from January 1, 1997 through the present.

RESPONSE 2:

There have been no reports or analyses for either United Water Florida Inc. or United Waterworks Inc. prepared by or for Standard & Poor's from January 1, 1997, through the present. United Waterworks Inc. was rated by Standard & Poor's in December 1996. Due to the copyright rules of Standard & Poor's, the company is prohibited from duplicating this article for distribution. The utility credit report may be available to interested parties by contacting Standard & Poor's directly.

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Public Service Commission  
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Staff Data Request-2nd Set

QUESTION 3:

Please provide copies of all reports and analyses for UWF and United Waterworks Inc. prepared by or for Moody's Investor Services from January 1, 1997 through the present.

RESPONSE 3:

There have been no reports or analyses for either United Water Florida or United Waterworks Inc. prepared by or for Moody's Investor Services from January 1, 1997, through the present.

State of Florida  
Public Service Commission  
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Staff Data Request-2nd Set

QUESTION 4:

For both UWF and United Waterworks Inc., please provide copies of all reports, reviews, and analyses for the past two years where the subject has been equity ratio, debt ratio, capital structure, cost of capital, or cost of debt.

RESPONSE 4:

There have been no reports, reviews or analyses prepared for United Water Florida Inc. where the subject has been equity ratio, debt ratio, capital structure, cost of capital, or cost of debt. United Waterworks Inc. was rated by Standard & Poor's in December 1996. Due to the copyright rules of Standard & Poor's, the company is prohibited from duplicating this article for distribution. The utility credit report may be available to interested parties by contacting Standard & Poor's directly.

State of Florida  
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Staff Data Request-2nd Set

QUESTION 5:

Please provide copies of the 1997 Annual Reports for UWF and United Waterworks Inc.

RESPONSE 5:

United Waterworks Inc. and UWF do not file Annual Reports to shareholders since they are wholly owned subsidiaries.

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QUESTION 6:

Please provide a schedule, in MFR Schedule D-5 format, detailing all debt UWF and United Waterworks Inc. project to issue during the period of 01/01/97 to 12/31/98.

RESPONSE 6:

United Water Florida has no long-term debt; the Company is financed completely with common equity by its parent, United Waterworks Inc.

The long-term debt of United Waterworks Inc. (UWW) is reflected on Schedule D-5 of the MFRs which were filed in the rate case. This schedule incorporated all of the debt UWW plans to issue from 1/1/97 through 12/31/98. As noted on this schedule, UWW has issued forty million dollars of Medium Term Notes at an average effective cost rate of 7.28% replacing three promissory notes with an effective cost rate of almost 10%.



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QUESTION 7:

Please explain in detail how the cost of short-term debt is determined.

RESPONSE 7:

Neither UWF nor United Waterworks Inc. had any short-term debt outstanding in 1997. United Waterworks Inc. does not plan on using any short-term debt through 1998.

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QUESTION 8:

Schedule B-1 and B-2, Line 3 call for "Depreciation, Net of CIAC Amortization." These schedules reference supporting Schedules B-13 and B-14. Staff has reviewed Schedules B-1, B-2, B-13 and B-14 and is unable to find inclusion of the amortization of CIAC. Please explain how the amortization was included and what schedules are referenced or provide revised schedules clearly showing the inclusion of the amortization of CIAC.

RESPONSE 8:

Please refer to Schedule 1 attached which reconciles and explains how the amortization of the CIAC was deducted from the overall plant depreciation schedules.

United Water Florida Inc.  
Schedule I

The amortization of CIAC for 1998 was calculated on MFR Schedule A-14.  
The net amount of depreciation was determined as follows:

Description	MFR Schedule	Water Operation	WW Operation
Intermediate Year 12/31/98			
Balance 12/31/97	A-14	5,716,369	11,659,876
Balance 12/31/98	A-14	<u>6,304,514</u>	<u>12,933,667</u>
Annual amortization 1998	Derived	588,145	1,273,791
	B-13, B-14	<u>1,872,946</u>	<u>3,662,902</u>
Net Depreciation Expense	B-1 (1998)	<u>1,284,801</u>	<u>2,389,111</u>
	B-2 (1998)		
Projected Year 12/31/99			
Balance 12/31/98	A-14	6,304,514	12,933,667
13-Month Avg. Balance 19	A-14	<u>6,616,037</u>	<u>13,609,392</u>
13-month avg. Amortiz. 19	Derived	311,523	675,725
	B-13, B-14	<u>2,141,982</u>	<u>4,087,067</u>
Net Depreciation Expense	B-1 (1999)	<u>1,830,459</u>	<u>3,411,342</u>
	B-2 (1999)		

The annual amortization of CIAC, as shown above, is credited to the Depreciation expense account (403). The annual amortization rate for CIAC for water is 2.33%  
The annual amortization rate for CIAC wastewater is 3.33%

The amortization rates are based on the depreciation rates approved by the Commission as follows:

Plant Acct	Description	Deprec. Rate
331	Tansmis. Mains	2.33%
352	Coll. Sewers	3.33%

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Staff Data Request -2nd Set

Question 9:

For each water treatment facility where a Packed Tower Aeration treatment process has been installed, please provide the following information:

- a. The cost to install the treatment plant.
- b. The design capacity of the treatment plant.
- c. The amount of water treated during the past two years.
- d. The chemical expense required for operation of the treatment plant during the past two years.
- e. The purchased power expense required for operation of the treatment plant during the past two years.
- f. The total expense for repairs and maintenance during the past two years.

Response 9:

There are two facilities where Packed Towers have been installed. The system became operational at the St. Johns North WTP in November 1996, while the system for the Monument Road WTP became operational in July 1997. We do not have a full two years of operational data on either system.

- a. Cost to install

St. Johns North WTP: Equipment and installation approximately \$92,000 plus yard piping. This system does not include an air scrubber.

Monument Road WTP: Equipment approximately \$235,000 includes erection of unit by vendor. Additional installation costs approximately \$44,700. This system includes an air scrubber system.

- b. Design Capacity

St. Johns North WTP:	1,000 GPM
Monument Road WTP:	2,000 GPM

c. Amount of water treated

St. Johns North WTP: 1997 - 164.222 million gallons  
1996 - 151.817 million gallons

Monument Road WTP: 1997 - 391.121 million gallons  
1996 - 397.778 million gallons

d. Chemical expense

St. Johns North WTP: 1997 - \$8,072.45  
1996 - \$9,531.90

Monument Road WTP: 1997 - Chlorine \$18.97 /MG  
1996 - Chlorine \$19.65/MG

e. Purchased power

St. Johns North WTP: 1997 - \$10,556  
1996 - \$11,154

Monument Road WTP: 1997 - \$32,526  
1996 - \$30,358

f. Repairs and maintenance.

Scheduled maintenance includes approximately 16 person hours per year for acid washing of the media in the scrubber units. Routine maintenance has been approximately one hour per week. Since the treatments systems are either still under warranty or have just recently had the warranty expire, there have not been any material maintenance costs.

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Question 10.

For each wastewater service area, please provide a list of all-engineering reports or studies prepared since January 1, 1996. This list should include the following information:

- a. Date of report;
- b. Who prepared the report;
- c. A brief description of the report; and
- d. The number of pages in the report;

Response 10:

A list of all engineering reports prepared since January 1996, for the wastewater service areas is attached. Each listing provides:

- a. Date of the report;
- b. Who prepared the report;
- c. Title/brief description on the report
- d. The number of pages in the report;

	UNITED WATER FLORIDA			
			WASTEWATER	
Report Title	Author	Date	Description	Pages
Baseline Monitoring Report for Nassau County	CH2M Hill	Feb-96	Baseline Monitoring Report for the Yulee Wetland	250
Engineering Report Ponte Vedra WWTF	CH2M Hill	Mar-96	Engineering Report Effluent Disposal for the Ponte Vedra Wastewater Treatment Facility	150
Antidegradation Response	CH2M Hill	Apr-96	Antidegradation Response Effluent Disposal for the St. Johns North Wastewater Treatment Facility	50
Ortega Hills Collection System Eval	Paulus Sokolowski & Sartor	Jun-96	Ortega Hills Collection System Evaluation	50
San Pablo WWTP Capacity Analysis Report	Camp Dresser & McKee	Jun-96	Capacity Analysis Report for San Pablo WWTP	35
Preliminary Engineering Report Ponte Vedra WWTF/ Prelim/Final	CH2M Hill	Sep-96	Preliminary Engineering Report for the Ponte Vedra Wastewater Treatment Facility Wastewater Permit Application Form I Gen Inform.	100
Royal Lakes Wastewater Treatment Plant	Paulos, Sokolowski & Sartor	Sep-96	Royal Lakes Wastewater Treatment Plant Hydraulic Evaluation	100
San Pablo Sewer System Evaluation	Paulus, Sokolowski and Sartor	Oct-96	San Pablo Sewer System Evaluation Final Preliminary Report (Revised December 10, 1996)	200
San Jose Sewer System Eval.	Paulus Sokolowski & Sartor	Oct-96	San Jose Sewer System Evaluation (Final) Preliminary Report (Revised December 10, 1996).	50
Facility Review for Purpose of Acquisition of Sunray Utilities Facilities in Nassau and St. Johns Counties	CH2M Hill	Oct-96	Facility Review for Purpose of Acquisition of Sunray Utilities in Nassau and St. Johns Counties	200
Phase I Environmental Site Assessment Report Lofotn Creek Wastewater Treatment Plant Facility	RSDI Environmental, Inc.	Oct-96	Phase I Environmental Site Assessment Report Lofotn Creek Wastewater Treatment Plant Facility	35
Master Plan for Wastewater Systems	CH2M Hill	Jun-97	Master Plan for Wastewater Systems St. Johns North	300
Systemwide Reuse Feasibility Study Report	CH2M Hill	Jun-97	Systemwide Reuse Feasibility Study Report	400

Report Title	Author	Date	Description	Pages
Baseline Monitoring Report for Blacks Ford Swamp	Ch2M Hill	Jul-97	Baseline Monitoring Report for Blacks Ford Swamp	250
Royal Lakes WWTF, Operations and Maintenance Report	Gordon Grimes, UWF	Jan-98	Royal Lakes WWTF, Operations and Maintenance Report	200
San Pablo Sewer Sub-System Final Report	Paulus, Sokolowski, & Sartor	Feb-98	San Pablo Sewer Sub-System Flow Monitoring Final Report	350
Water Assessment of Biological Chemical and Physical Characteristics	CH2M Hill	Mar-98	Receiving Water Assessment of Biological, Chemical and Physical Characteristics Jacksonville Heights WWTF	100
San Jose Sewer Sub-System Flow Monitoring Final Report, Volume One and Two	Paulus, Sokolowski and Sartor	Mar-98	San Jose Sewer Sub-System Flow Monitoring Final Report Volume One and Two	300
Ortage Hill Sewer Sub-System Flow Monitoring Final Report	Paulus, Sokolowski and Sartor	Jun-98	Ortage Hill Sewer Sub-System Flow Monitoring Final Report	150



State of Florida  
Public Service Commission  
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Staff Data Request -2nd Set

Question 11.

For each water service area, please provide a list of all-engineering reports or studies prepared since January 1, 1996. This list should include the following information:

- a. Date of report;
- b. Who prepared the report;
- c. A brief description of the report; and
- d. The number of pages in the report;

Response 11:

A list of all engineering reports prepared since January 1996, for the water service areas are attached. Each listing provides:

- a. Date of the report;
- b. Who prepared the report;
- c. Title/brief description of the report;
- d. The number of pages in the report;

UNITED WATER FLORIDA  
WATER

Report Title	Author	Date	Description	Pages
Report on the Lake Forest WTP	Charlotte Smith & Associates, Inc.	Mar-95	Report on the Lake Forest WTP. Study of diffused aeration, hydraulics and disinfection at the Lake Forest plant to optimize treatment.	30
Preliminary Engineering Report for the Ortega Hills Water System	Edgar Espinoza, UWF	May-96	Evaluation of water system needs and proposed improvements.	18
Preliminary Engineering Report for the San Jose Water System	Edgar Espinoza, UWF	Jul-96	Evaluation of water system needs and proposed improvements.	14
Facility Review for Purpose of Acquisition of Sunray Utilities In Nassau and St. Johns Counties	CH2M Hill	Oct-96	Facility Review for Purpose of Acquisition of Sunray Utilities Facilities in Nassau and St. Johns Counties	350
Phase I Environmental Site Assessment Report Otter Run Water Treatment Plant Facility	RSDI Environmental, Inc.	Oct-96	Phase I Environmental Site Assessment Report Otter Run Water Treatment Plant Facility	30
Master Plan for Water & Wastewater System	CH2M Hill	Jun-97	Master Plan for Wastewater and Water Systems St. Johns North	300
Update on the Effectiveness of Corrosion Control Systems at UWF	Todd D. Mackey, UWF	Feb-98	Update on the Effectiveness of Corrosion Control Systems at UWF	43

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Question 12:

If any of the utility's systems are in a water use caution area (WUCA), please provide the following Information:

- a. Which systems are located in a WUCA?
- b. The date when the Water Management District (WMD designated that particular area(s) as a WUCA.
- c. Whether the WMD has lowered the targeted gallons per day per capita (gpdc) threshold for systems in the WUCA, and, if so, what the new gpdc target is.
- d. What the current gpdc for each system is.
- e. How the WMD calculates gpdc.

Response 12:

- a. The WUCA has expanded to include Duval County, Nassau County and St Johns County (Chapter 40C-23, Florida Administrative Code). This Chapter was amended to include the entire District in the WUCA on September 9, 1996. All UWF's water systems are included :

Brackridge	Riverview	Nassau County System	San Jose
Greenfield	Westwood	Ortega Hills	Hyde Grove
Ridgeland	Bon air	Royal Lakes	Lake Forest
Milmar	Arlington System	Ponce De Leon System	
Forest Brook	Holly Oaks System	St Johns North	
Magnolia Gardens	Jacksonville Heights	St Johns Forest	
Venetia Terrace	Marshview	Ponte Vedra System	

Note: The Arlington System consists of the following WTP's : University Park, Lake Lucina, Alderman Park, Columbine, and Elvia.

The Holly Oaks System consists of the following WTP's: Holly Oaks, Monument Rd. and Queen Akers

The Ponte Vedra System consists of the following WTP's: Ponte Vedra North and Corona Rd.

The Ponce De Leon System consists of the following WTP's: A1A North, A1A South and Ponce De Leon .

The Jax. Hts. System consists of the following WTP's: Green Forest, Oak Hill and Wheat Road.

Nassau County System consists of the following WTP'S: Nassau Jail, Lofton Oaks, Amoco and Otter Run.

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Response 12: (Con't)

- b. The rule establishing the WUCA was adopted on May 20, 1992 and amended on September 9, 1996. A copy is attached.
- c. The WMD District has not lowered the targeted gallons per day per capita threshold.
- d. As of July 1998 the current gpdc for each system based on 3.5 persons per connection is calculated to be:

Facility	gpdc	Facility	gpdc	Facility	gpdc
Brackridge	85	Westwood	102	Royal Lakes	446
Greenfield	122	Bon air	102	Ponce De Leon System	146
Ridgeland	97	Arlington System	126	St Johns North	183
Milmar	100	Holly Oaks System	213	St Johns Forest	219
Forest Brook	91	Marshview	141	Ponte Vedra System	236
Magnolia Gardens	70	Jacksonville Heights System	104	San Jose	158
Venetia Terrace	65	Nassau County System	215	Hyde Grove	131
Riverview	94	Ortega Hills	73	Lake Forest	89

- e. We are not aware that the WMD calculates gpdc. The WMD usually predicts the demand or usage rate based on population and water use projections provided by the Utility at the time of a permit renewal. The WMD is presently preparing their "2020 Plan", which will present demands on a regional basis and identify sources to meet the demand. As we understand the plan, once completed, it will be used to set local demand thresholds and withdrawal rates as water use permits are renewed.

V. 14, p. 346-2C

WATER RESOURCE CAUTION AREA

(R. 10/96)  
40C-23.001

CHAPTER 40C-23  
WATER RESOURCE CAUTION AREA

40C-23.001 Water Resource Caution Area.

40C-23.001 Water Resource Caution Area. The Governing Board has designated the entire area of the District as described in subsection 373.069(2)(c), F.S., to implement the requirement of subsection 62-40.416, F.A.C., and has named this area "Water Resource Caution Area." The Governing Board has determined that the entire area of the District meets the requirement of subsection 62-40.416, F.A.C., because within recent history all parts of the District have been subject to

a declaration of water shortage pursuant to section 373.175, F.S., on more than one occasion. Additionally, the Governing Board's policy is to implement reuse, and provide for the greater availability of reclaimed water District-wide to conserve available water resources pursuant to the requirements of section 373.250, F.S. Notwithstanding the provision of any other District rule, this chapter shall not implement or activate the requirements of section 6.7.1.5 of the Applicant's Handbook: Consumptive Uses of Water, 4-25-96.

*Specific Authority 373.044, 373.113, 373.171 FS. Law Implemented 373.026(10), 373.219, 373.223, 373.250 FS. History—New 5-20-92, Amended 9-10-96.*

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Question 13:

Please state whether the WMD has imposed any watering restrictions on any of the utility's system with the past 2 years. If so, please provide the following information.

- a. The date the restrictions are applicable.
- b. The length of time the restrictions are applicable.
- c. The customer classes to which the restrictions were/are applicable.
- d. Please provide a copy of the WMD notice to the utility systems advising of the restrictions and conditions.

Response 13:

The WMD has imposed a year round restriction on irrigation. Irrigating is not permitted between the hours of 10:00am to 4:00pm. See Rule 40C-2.042, FAC, a copy of which is attached.

**40C-2.042 General Permit by Rule.** A general consumptive use permit by rule is hereby established for landscape, golf course, recreation, agriculture and nursery irrigation, and for aquaculture, ornamental and aerating fountains, and all other types of uses. This section shall apply to all consumptive uses of water which do not meet or exceed an individual permitting threshold under subsection 40C-2.041(1). However, this section shall not apply to domestic uses of water by individuals, i.e. water used for the household purposes of drinking, bathing, cooking or sanitation. Persons using or proposing to use water in a manner not authorized under this section, must apply for a general permit pursuant to chapter 40C-20, F.A.C., or a modification of their individual permit pursuant to this chapter.

(1) The Board hereby grants a general permit to each person located within the District to use, withdraw or divert water to irrigate landscape, agricultural crops, nursery plants, golf course and recreational areas, provided the irrigation occurs only between the hours of 4:00 p.m. and 10:00 a.m. daily. Such water use shall be subject to the following exceptions and alternative water conservation practices:

(a) Irrigation using a micro-irrigation system is allowed anytime.

(b) The use of reclaimed water for irrigation is allowed anytime provided appropriate signs are placed on the property to inform the general public and District enforcement personnel of such use.

(c) The use of recycled water from wet detention treatment ponds for irrigation is allowed anytime provided the ponds are not augmented from any ground or off-site surface water, or public supply sources.

(d) Irrigation of, or in preparation for planting, sod, agricultural crops, or nursery stock, is allowed at any time of day for one 30 day period provided irrigation is limited to the amount necessary for crop or plant establishment. Irrigation of new landscape and newly seeded or sprigged golf course



areas is allowed at any time of day for one 60 day period.

(e) Chemigation and fertigation are allowed at any time of day one time per week, and anytime during the normal 4:00 p.m. to 10:00 a.m. irrigation hours.

(f) Watering in of chemicals, including insecticides, pesticides, fertilizers, fungicides, and herbicides when required by law, the manufacturer, or best management practices is allowed anytime within 24 hours of application.

(g) Irrigation systems may be operated anytime for maintenance and repair purposes not to exceed ten minutes per hour per zone.

(h) Irrigation of agricultural crops by seepage systems which regulate off-site discharges through the use of water control structures is allowed anytime, provided the discharge does not overtop the control structure by more than one-half inch, there is no discharge between 1:00 p.m. and 7:00 p.m. unless associated with a storm event, and the structure is well maintained.

(i) The use of water to protect agricultural crops and nursery plants, except ferns, from frost or freeze damage is allowed when freezing temperatures or frost are predicted by an official weather forecasting service.

(j) The use of water to protect ferns from frost or freeze damage is allowed when the "wet bulb" temperature, as measured by a "wet bulb" thermometer at the site of application, is 34 degrees Fahrenheit or less. Freeze protection must cease when temperatures rise above 40 degrees Fahrenheit.

(k) The use of water to protect agricultural crops, nursery plants and golf course turf from heat stress damage is allowed anytime, provided the watering does not exceed ten minutes per hour per zone or one twenty minute period per day, whichever is applicable.

(l) Irrigation of agricultural crops by traveling volume guns which require manual repositioning is allowed anytime.

(m) Irrigation using one hand-held hose equipped with an automatic shut-off nozzle is allowed anytime.

(2) The Board hereby grants a general permit for all aquacultural consumptive uses of water located within the District provided the containment or impoundment facility utilized to cultivate the aquacultural product has no off-site surface water discharge and an aerator is used to add oxygen to the facility when necessary. Such water use is limited to the amount necessary to accomplish average expected production. The use of reclaimed water within an aquacultural facility shall not be subject to these restrictions provided appropriate signs are placed on the property to inform the general public and District enforcement personnel of such use.

(3) The Board hereby grants a general permit for all existing and proposed ornamental and aerating fountains within the District, provided the same water is recirculated, there is no off-site discharge and the fountain is properly installed,

maintained and operated to ensure that a minimal amount of water is used. Non-recirculating fountains in existence on 7-23-91 shall be retrofitted to meet the requirements of this subsection by 7-23-93.

(4) The Board hereby grants a general permit to each person located within the District to use water to create a containment or impoundment facility solely for aesthetic purposes, provided the containment or impoundment facility is not augmented thereafter from any ground or off-site surface water source.

(5) The Board hereby grants a general permit to each person located within the District to use water for any purpose not specifically listed above and not subject to the individual permitting requirements. Domestic consumption by individuals does not, by law, require a permit.

(6) All of the consumptive uses authorized under this section are presumed to meet the conditions for issuance of permits in section 40C-2.301, F.A.C.

Note: Individual and general (chapter 40C-20, F.A.C.), consumptive use permittees may be subject to different irrigation and conservation requirements than those established above when necessary to meet the applicable criteria of section 40C-2.301, F.A.C. Specific requirements will be listed as conditions of these permits.

*Specific Authority 373.044, 373.113, 373.171 FS. Law Implemented 373.118, 373.219, 373.223 FS. History—New 7-23-91.*

State of Florida  
Public Service Commission  
Docket No. 980214-WS  
Staff Data Request -2nd Set

Question 14:

Does the utility have a conservation program approved by the WMD?

- a. If so, is the conservation program approved for the utility on an overall basis or is there a conservation program approved for each individual system?
- b. Are there any requirements for conservation rate structure which is more aggressive than the standard base facility charge/gallorage charge rate structure.
- c. If there is such a requirement, does the utility believe a more aggressive rate structure is appropriate? (Please explain your answer)
- d. Please provide a copy of the approved conservation agreement.

Response 14:

The utility has an approved WMD conservation program.

- a. The conservation program is for the Utility on an overall basis.
- b. There are no requirements for a rate structure that is more aggressive than the standard base facility/gallorage charge rate structure. As set forth in Order No. 9533, the Commission found that “for those customers who practice conservation, [UWF’s water rate]...structure will afford them an opportunity to be recognized and compensated in the form of savings for their conservation efforts.”
- c. There is no such requirement.
- d. A copy of the approved conservation plan is enclosed under separate cover.

State of Florida  
Public Service Commission  
Docket No. 980214-WS  
Staff Data Request -2nd Set

Question 15:

Have any of the utility's wells been taken off-line during the past 2 years? If so, please state when.

Response 15:

Other than routine maintenance, UWF took the Holly Oaks WTP well in the Holly Oaks Grid permanently off line, on September 26, 1996. The Lake Forest WTP well has been off line for plant maintenance. It is anticipated that this well will be back in service prior to the end of year 1998.

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Question 16:

Does the WMD anticipate requiring one or more of the utilities wells to be taken off-line during the next 2 years? If so, please state when.

Response 16:

Other than routine maintenance, UWF does not anticipate the WMD requiring any well to be taken out of service within the next two years.

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Public Service Commission  
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Staff Data Request -2nd Set

Question 17:

Is the Ponte Vedra reuse project required by the Department of Environmental Protection (DEP) or the WMD?

17. a. If yes, please provide a copy of the DEP permit or WMD consumptive use permit containing the requirement/approval for the reuse project.

Response 17:

The Consumptive Use Permit issued by the WMD for the Ponte Vedra WTP requires the disposal of treated effluent on the Ponte Vedra Golf Course when the average daily flow reaches 0.300 mgd. The Ponte Vedra reuse project is intended to comply with this requirement.

- 17a. A copy of the WMD Consumptive Use Permit is attached. Refer to Conditions 11 and 19 of the permit.



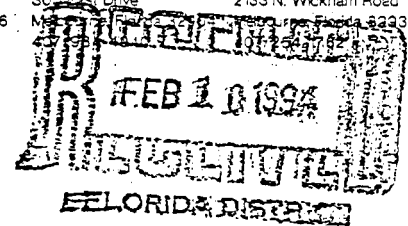
Henry Dean, Executive Director  
John R. Wehle, Assistant Executive Director

POST OFFICE BOX 1429 PALATKA, FLORIDA 32178-1429  
TELEPHONE 904/329-4500 SUNCOM 904/860-4500  
FAX (EXECUTIVE/LEGAL) 329-4125 (PERMITTING) 329-4315 (ADMINISTRATION/FINANCE) 329-4508  
FIELD STATIONS

618 E. South Street Orlando, Florida 32801 407/897-4300  
7775 Baymeadows Way Suite 102 Jacksonville, Florida 32256 904/730-6270  
PERMITTING: 305 East Drive Jacksonville, Florida 32235-8109  
OPERATIONS: 2133 N. Wickham Road Jacksonville, Florida 32235-8109

JANUARY 26, 1994

JACKSONVILLE SUBURBAN UTILITIES CORPORATION  
1400 MILLCREEK ROAD  
JACKSONVILLE, FL 32225



SUBJECT: CONSUMPTIVE WATER USE PERMIT NUMBER 2-109-0118NM

THE DISTRICT HAS RECEIVED A COPY OF THE WARRANTY DEED NAMING JACKSONVILLE SUBURBAN UTILITIES CORPORATION AS THE OWNER OF THE PARCEL OF PROPERTY FORMERLY OWNED BY PONTE VEDRA UTILITIES.

PURSUANT TO SECTION 400-1.612 (1), (2) AND (3) WHICH STATES:

- "(1) TRANSFER OF PERMITTED FACILITY. WITHIN (30) DAYS OF ANY SALE, CONVEYANCE, OR OTHER TRANSFER OF A FACILITY, SYSTEM, OR WELL PERMITTED BY THE DISTRICT, THE EXISTING PERMITTEE MUST NOTIFY THE DISTRICT, IN WRITING, OF SUCH TRANSFER, GIVING THE NAME AND ADDRESS OF THE TRANSFEREE AND PROVIDING A COPY OF THE INSTRUMENT EFFECTUATING THE TRANSFER.
- (2) TRANSFER OF INTEREST IN REAL PROPERTY. WITHIN 30 DAYS OF ANY TRANSFER OF OWNERSHIP OR CONTROL OF THE REAL PROPERTY AT WHICH ANY PERMITTED FACILITY, SYSTEM, CONSUMPTIVE USE, OR ACTIVITY IS LOCATED THE PERMITTEE MUST NOTIFY THE DISTRICT, IN WRITING, OF THE TRANSFER, GIVING THE NAME AND ADDRESS OF THE NEW OWNER OR PERSON IN CONTROL AND PROVIDING A COPY OF THE INSTRUMENT EFFECTUATING THE TRANSFER.
- (3) TRANSFER OF PERMIT. TO TRANSFER A PERMIT, THE PERMITTEE MUST PROVIDE THE INFORMATION REQUIRED IN SUBSECTIONS (1) AND (2), TOGETHER WITH A WRITTEN STATEMENT FROM THE PROPOSED TRANSFEREE THAT IT WILL BE BOUND BY ALL TERMS AND CONDITIONS OF THE PERMIT. ADDITIONALLY, WHERE APPLICABLE, THE TRANSFEREE MUST DEMONSTRATE THAT IT IS CAPABLE OF CONSTRUCTING, OPERATING AND MAINTAINING THE PERMITTED FACILITY, SYSTEM, CONSUMPTIVE USE, WELL OR OR ACTIVITY. ONCE THE REQUIRED INFORMATION HAS BEEN PROVIDED, THE DISTRICT MAY TRANSFER THE PERMIT TO THE TRANSFEREE."

PERMIT 2-109-0118NM IS HEREBY TRANSFERRED TO JACKSONVILLE SUBURBAN UTILITIES CORPORATION. IF THERE IS AN ANTICIPATED CHANGE IN LAND OR WATER USE, A MODIFIED APPLICATION MUST BE SUBMITTED TO THE DISTRICT PRIOR TO THE PROPOSED CHANGE.

Joe E. Hill, CHAIRMAN  
LEESBURG

Patricia T. Harden, VICE CHAIRMAN  
SANFORD

Jesse J. Parrish, III, TREASURER  
TITUSVILLE

Lenore N. McCullagh, SECRETARY  
ORANGE PARK

Reid Hughes  
DAYTONA BEACH

Dan Roach  
FERNANDINA BEACH

William Segal  
MAITLAND

Denise M. Prescod  
JACKSONVILLE

James H. Williams  
OCALA

JACKSONVILLE SUBURBAN UTILITIES CORPORATION


PAGE TWO

JANUARY 26, 1994

AS THE PERMIT HOLDER, YOU WILL BE RESPONSIBLE FOR SUPPLYING ANY INFORMATION WHICH IS SHOWN IN THE PERMIT CONDITIONS. IF YOU HAVE ANY QUESTIONS CONCERNING THE CONDITIONS, PLEASE CONTACT ME AT THE ABOVE ADDRESS OR CALL 904/329-4274.

THANK YOU FOR YOUR COOPERATION WITH THIS MATTER. IF YOU HAVE ANY QUESTIONS OR IF THE DISTRICT CAN BE OF FURTHER ASSISTANCE TO YOU, PLEASE DO NOT HESITATE TO CONTACT THIS OFFICE.

SINCERELY,

  
ROSIE PARKER, DATA CONTROL TECHNICIAN  
DIVISION OF PERMIT DATA SERVICES

ENCLOSURES: PERMIT WITH CONDITIONS  
WELL TAGS  
COMPLIANCE FORMS

CC: DISTRICT PERMIT FILE  
LYNN MINOR  
PONTE VEDRA UTILITIES  
MARTIN ADE BIRCHFIELD & MICKLER

"EXHIBIT A"

CONDITIONS FOR ISSUANCE OF PERMIT NUMBER 2-109-0118NM

JACKSONVILLE SUBURBAN UTILITIES CORPORATION

DATED OCTOBER 13, 1987

1. DISTRICT AUTHORIZED STAFF, UPON PROPER IDENTIFICATION, WILL HAVE PERMISSION TO ENTER, INSPECT AND OBSERVE PERMITTED AND RELATED FACILITIES IN ORDER TO DETERMINE COMPLIANCE WITH THE APPROVED PLANS, SPECIFICATIONS AND CONDITIONS OF THIS PERMIT.
2. NOTHING IN THIS PERMIT SHOULD BE CONSTRUED TO LIMIT THE AUTHORITY OF THE ST. JOHNS RIVER WATER MANAGEMENT DISTRICT TO DECLARE A WATER SHORTAGE AND ISSUE ORDERS PURSUANT TO SECTION 373.175, FLORIDA STATUTES, OR TO FORMULATE A PLAN FOR IMPLEMENTATION DURING PERIODS OF WATER SHORTAGE, PURSUANT TO SECTION 373.246, FLORIDA STATUTES. IN THE EVENT OF A WATER SHORTAGE, AS DECLARED BY THE DISTRICT GOVERNING BOARD, THE PERMITTEE MUST ADHERE TO REDUCTIONS IN WATER WITHDRAWALS AS SPECIFIED BY THE DISTRICT.
3. PRIOR TO THE CONSTRUCTION, MODIFICATION, OR ABANDONMENT OF A WELL, THE PERMITTEE MUST OBTAIN A WATER WELL CONSTRUCTION PERMIT FROM THE ST. JOHNS RIVER WATER MANAGEMENT DISTRICT PURSUANT TO CHAPTER 40C-3, FLORIDA ADMINISTRATIVE CODE. CONSTRUCTION, MODIFICATION OR ABANDONMENT OF A WELL WILL REQUIRE MODIFICATION OF THE CONSUMPTIVE USE PERMIT WHEN SUCH CONSTRUCTION, MODIFICATION OR ABANDONMENT IS OTHER THAN THAT SPECIFIED AND DESCRIBED ON THE CONSUMPTIVE USE PERMIT APPLICATION FORM.
4. LEAKING OR INOPERATIVE WELL CASINGS, VALVES, OR CONTROLS MUST BE REPAIRED OR REPLACED AS REQUIRED TO PUT THE SYSTEM BACK IN AN OPERATIVE CONDITION ACCEPTABLE TO THE DISTRICT. FAILURE TO MAKE SUCH REPAIRS WILL BE CAUSE FOR DEEMING THE WELL ABANDONED IN ACCORDANCE WITH CHAPTER 17.21.02(5), FLORIDA ADMINISTRATIVE CODE AND CHAPTER 373.309, FLORIDA STATUTES.
5. PERMITTEE MUST MITIGATE ANY ADVERSE IMPACT CAUSED BY WITHDRAWALS PERMITTED HEREIN ON LEGAL USES OF WATER EXISTING AT THE TIME OF PERMIT APPLICATION. THE DISTRICT HAS THE RIGHT TO CURTAIL PERMITTED WITHDRAWAL RATES OR WATER ALLOCATIONS IF THE WITHDRAWALS OF WATER CAUSE AN ADVERSE IMPACT ON LEGAL USES OF WATER WHICH EXISTED AT THE TIME OF PERMIT APPLICATION. ADVERSE IMPACTS ARE EXEMPLIFIED BUT NOT LIMITED TO:
  - (A) REDUCTION OF WELL WATER LEVELS RESULTING IN A REDUCTION OF 10% IN THE ABILITY OF AN ADJACENT WELL TO PRODUCE WATER;



- (B) REDUCTION OF WATER LEVELS IN AN ADJACENT SURFACE WATER BODY RESULTING IN A SIGNIFICANT IMPAIRMENT OF THE USE OF WATER IN THAT WATER BODY.
  - (C) SALINE WATER INTRUSION OR INTRODUCTION OF POLLUTANTS INTO THE WATER SUPPLY OF AN ADJACENT WATER USE RESULTING IN A SIGNIFICANT REDUCTION OF WATER QUALITY; AND
  - (D) CHANGE IN WATER QUALITY RESULTING IN EITHER IMPAIRMENT OR LOSS OF USE OF A WELL OR WATER BODY.
6. PERMITTEE MUST MITIGATE ANY ADVERSE IMPACT CAUSED BY WITHDRAWALS PERMITTED HEREIN ON ADJACENT LAND USES WHICH EXISTED AT THE TIME OF PERMIT APPLICATION. THE DISTRICT HAS THE RIGHT TO CURTAIL PERMITTED WITHDRAWAL RATES OF WATER ALLOCATIONS IF WITHDRAWALS OF WATER CAUSE AN ADVERSE IMPACT ON ADJACENT LAND USE WHICH EXISTED AT THE TIME OF PERMIT APPLICATION. ADVERSE IMPACTS ARE EXEMPLIFIED BY BUT NOT LIMITED TO:
- (A) SIGNIFICANT REDUCTION IN WATER LEVELS IN AN ADJACENT SURFACE WATER BODY;
  - (B) LAND COLLAPSE OR SUBSIDENCE CAUSED BY A REDUCTION IN WATER LEVELS; AND
  - (C) DAMAGE TO CROPS AND OTHER TYPES OF VEGETATION.
7. THE DISTRICT MUST BE NOTIFIED, IN WRITING, WITHIN 30 DAYS OF THE TRANSFER OF THIS PERMIT. ALL TRANSFERS ARE SUBJECT TO THE PROVISIONS OF SECTION 40C-2.351, FLORIDA ADMINISTRATIVE CODE, WHICH STATES THAT ALL TERMS AND CONDITIONS OF THE PERMIT SHALL BE BINDING OF THE TRANSFEREE.
8. A DISTRICT-ISSUED IDENTIFICATION TAG SHALL BE PROMINENTLY DISPLAYED AT EACH WITHDRAWAL SITE BY PERMANENTLY AFFIXING SUCH TAG TO THE PUMP, HEADGATE, VALVE OR OTHER WITHDRAWAL FACILITY AS PROVIDED BY SECTION 40C-2.401, FLORIDA ADMINISTRATIVE CODE. PERMITTEE SHALL NOTIFY THE DISTRICT IN THE EVENT THAT A REPLACEMENT TAG IS NEEDED.
9. IF THE PERMITTEE DOES NOT SERVE A NEW PROJECTED DEMAND LOCATED WITHIN THE SERVICE AREA UPON WHICH THE ANNUAL ALLOCATION WAS CALCULATED, THE ANNUAL ALLOCATION WILL BE SUBJECT TO MODIFICATION.
10. ON THE TENTH DAY FOLLOWING THE MONTH OF RECORD, PERMITTEE MUST SUBMIT TO THE DISTRICT COPIES OF THE DER MONTHLY WATER TREATMENT PLANT REPORTS ON A MONTHLY BASIS FOLLOWING THE MONTH OF RECORD. THE PERMIT NUMBER MUST BE ATTACHED TO ALL REPORTS.

11. TREATED EFFLUENT MUST BE USED AS IRRIGATION WATER WHEN IT BECOMES PRACTICAL, ECONOMICALLY FEASIBLE, AND PERMISSIBLE UNDER APPLICABLE STATE AND FEDERAL STATUTES OR REGULATIONS PROMULGATED THEREUNDER.
12. WHENEVER FEASIBLE, THE PERMITTEE MUST USE NATIVE VEGETATION THAT REQUIRES LITTLE SUPPLEMENTAL IRRIGATION FOR LANDSCAPING WITHIN THE SERVICE AREA OF THE PROJECT.
13. THIS PERMIT WILL EXPIRE 7 YEARS FROM THE DATE OF ISSUANCE.
14. MAXIMUM ANNUAL WITHDRAWALS MUST NOT EXCEED 488.5 MGAL IN 1988; 548.7 MGAL IN 1989; 614.4 MGAL IN 1990; 668.1 MGAL IN 1991; 700.9 MGAL IN 1992; 730.0 MGAL IN 1993; AND 833.8 MGAL IN 1994.
15. MAXIMUM DAILY WITHDRAWALS MUST NOT EXCEED 2.68 MGAL IN 1988; 3.01 MGAL IN 1989; 3.37 MGAL IN 1990; 3.66 MGAL IN 1991; 3.84 MGAL IN 1992; 4.00 MGAL IN 1993; AND 4.57 MGAL IN 1994.
16. SOURCE CLASSIFICATION IS CONFINED OR SEMI-CONFINED AQUIFER.
17. USE CLASSIFICATION IS 70% HOUSEHOLD; 25% COMMERCIAL/ INDUSTRIAL; AND 5% URBAN LANDSCAPE IRRIGATION.
18. A WATER SAMPLE MUST BE TAKEN FROM EACH PRODUCTION WELL IN MAY AND OCTOBER EACH YEAR FOR THE DURATION OF THE PERMIT. THE SAMPLES MUST BE COLLECTED AFTER THE WELL HAS BEEN ALLOWED TO DISCHARGE AT LEAST 20 MINUTES AT DESIGN CAPACITY. THE SAMPLES MUST BE ANALYZED FOR CHLORIDE; SODIUM; POTASSIUM; CALCIUM; MAGNESIUM; SULFATE; TOTAL DISSOLVED SOLIDS (TDS); AND PH. THE ANALYSES MUST BE SENT TO THE DISTRICT WITHIN 30 DAYS OF SAMPLING.
19. THE PERMITTEE MUST MAINTAIN RECORDS OF THE DAILY WASTEWATER FLOW FROM THE PONTE VEDRA WASTEWATER TREATMENT PLANT. THE AVERAGE DAILY FLOW (ADF) MUST BE CALCULATED ON A MONTHLY BASIS. THE MONTHLY ADF CALCULATIONS MUST BE SENT TO THE DISTRICT EVERY 6 MONTHS STARTING AT THE ISSUANCE OF THIS PERMIT. WHEN THE ADF REACHES .300 MGD; THE PERMITTEE MUST DISPOSE OF ALL TREATED EFFLUENT ON THE PONTE VEDRA GOLF COURSE.

ST. JOHNS RIVER WATER MANAGEMENT DISTRICT  
POST OFFICE BOX 1429  
PALATKA, FLORIDA 32178-1429

PERMIT NO. 2-109-0118NM

DATE ISSUED OCTOBER 13, 1987

A PERMIT AUTHORIZING:

USE OF GROUNDWATER FROM THE FLORIDAN AQUIFER TO SERVE AN  
ESTIMATED POPULATION OF 11,422 PEOPLE IN 7 YEARS

LOCATION:

SECTION 16 27 43, TOWNSHIP 03 SOUTH, RANGE 29 EAST  
ST. JOHNS COUNTY,  
PONTE VEDRA BEACH NTH & STH

ISSUED TO:  
(OWNER)

JACKSONVILLE SUBURBAN UTILITIES CORPORATION  
1400 MILLCOE ROAD  
JACKSONVILLE, FL 32225

PERMITTEE AGREES TO HOLD AND SAVE THE ST. JOHNS RIVER WATER MANAGEMENT DISTRICT AND ITS SUCCESSORS HARMLESS FROM ANY AND ALL DAMAGES, CLAIMS, OR LIABILITIES WHICH MAY ARISE FROM PERMIT ISSUANCE. SAID APPLICATION, INCLUDING ALL PLANS AND SPECIFICATIONS ATTACHED THERETO, IS BY REFERENCE MADE A PART HEREOF.

THIS PERMIT DOES NOT CONVEY TO PERMITTEE ANY PROPERTY RIGHTS NOR ANY RIGHTS OR PRIVILEGES OTHER THAN THOSE SPECIFIED HEREIN, NOR RELIEVE THE PERMITTEE FROM COMPLYING WITH ANY LAW, REGULATION OR REQUIREMENT AFFECTING THE RIGHTS OF OTHER BODIES OR AGENCIES. ALL STRUCTURES AND WORKS INSTALLED BY PERMITTEE HEREUNDER SHALL REMAIN THE PROPERTY OF THE PERMITTEE.

THIS PERMIT MAY BE REVOKED, MODIFIED OR TRANSFERRED AT ANY TIME PURSUANT TO THE APPROPRIATE PROVISIONS OF CHAPTER 373 OR 403, FLORIDA STATUTES AND 40C-1, FLORIDA ADMINISTRATIVE CODES:

PERMIT IS CONDITIONED UPON:

SEE CONDITIONS ON ATTACHED "EXHIBIT A", DATED OCTOBER 13, 1987

AUTHORIZED BY: ST. JOHNS RIVER WATER MANAGEMENT DISTRICT

DEPARTMENT OF RESOURCE MANAGEMENT

GOVERNING BOARD

BY: \_\_\_\_\_

*Jeff Elledge*  
(DIRECTOR)  
JEFF ELLEDGE

BY: \_\_\_\_\_

*Henry Dean*  
(ASSISTANT SECRETARY)  
HENRY DEAN



State of Florida  
Public Service Commission  
Docket No. 980214-WS  
Staff Data Request -2nd Set

Question 18:

Is the Ponte Vedra Golf Course located within the utility's authorized service territory? If not, please provide the following information:

- a. In which utility's service territory is it located?
- b. Has the utility named in No. 7.a. above been notified of UWF's plans to provide reused water service to the Ponte Vedra Gold Course?
- c. Have any other utilities, governmental agencies, etc. been notified of UWF's plans to provide reused water service to the Ponte Vedra Gold Course?

Response 18:

- a. The Ponte Vedra Golf Course is within UWF's authorized service area.
- b. Not applicable.
- c. Not applicable. However, FDEP, Water Management District and St Johns Service Company are aware of our plans to provide reuse water service to the Ponte Vedra Golf Course.

State of Florida  
Public Service Commission  
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Staff Data Request -2nd Set

Question 19:

How does the Ponte Vedra Golf Course receive its potable water and wastewater service (i.e., UWF, another utility (please provide utility name), private well, septic tanks)?

Response 19:

The Ponte Vedra Golf Course receives its potable water and wastewater service from UWF.

State of Florida  
Public Service Commission  
Docket No. 980214-WS  
Staff Data Request -2nd Set

Question 20:

Has the utility begun construction on the reuse facilities: If not, please indicate when construction will begin:

Response 20:

UWF has begun the construction of the reuse facilities. The construction of these facilities is approximately 20% complete.

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Question 21:

Please indicate when the utility plans to begin providing reuse service to the Ponte Vedra Golf Course.

Response 21:

UWF plans to begin providing reuse service (reclaimed water) to the Ponte Vedra Golf Course by late 1998 to early 1999.

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Question 22:

Please describe the plant upgrades that are needed to implement reuse to the Ponte Vedra Golf Course (e.g., the plant is currently producing effluent to reuse quality and only the transmission and distribution system is needed, additional filters must be added, etc.)

Response 22:

The Ponte Vedra WWTP presently does not produce reuse quality irrigation water. Improvements that are required to meet reuse requirements include filtration, UV disinfection and a transmission main to the Golf Course's holding ponds. Ponte Vedra Golf Course will be providing the irrigation system.



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Question 23:

In the utility's "Responses to Deficiency Letter, June 1998", Item 3 contains a schedule of the company's investment work orders which support the company's plant addition forecast for the years 1998 and 1999. The schedule shows 1998 plant additions for the Ponte Vedra wastewater treatment plant for the categories of WWTP Upgrade, WWTP Site Work, and Effluent FM. Please identify the 1998 additions shown for the Ponte Vedra wastewater treatment plant that are related specifically to the reuse project.

Response 23:

The following 1998 capital projects are related directly to the reuse project:

<u>CEA #</u>	<u>Description</u>	<u>Additions (000's)</u>
C98R004	Ponte Vedra WWTP Upgrade	1357.1
C98S001	<u>Ponte Vedra Effluent FM</u>	<u>150.0</u>
	Total Additions	\$1507.1

State of Florida  
Public Service Commission  
Docket No. 980214-WS  
Staff Data Request -2nd Set

Question 24:

Please specify what percentage of the effluent produced by the Ponte Vedra wastewater treatment plant will be used by the Ponte Vedra Golf Course. If this amount is less than 100%, please explain how the utility will dispose of the remaining effluent.

Response 24:

All of the effluent produced by the Ponte Vedra wastewater treatment plant will be discharged to a pond at the Ponte Vedra Golf Course. The effluent will be used by the Ponte Vedra Golf Course for irrigation.

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Public Service Commission  
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Staff Data Request-2nd Set

QUESTION 25:

According to Schedules G-43 (page 15) and G-44 of the application, the utility is proposing to provide reused water service to the Ponte Vedra Golf Course at a zero rate. Please explain why the utility in its contract with the golf course agreed not to request a reuse rate higher than zero.

RESPONSE 25:

The organization that owned Ponte Vedra Utilities Company (PVUC) also owned the Ponte Vedra Golf Course. The consumptive use permit No. 2-109-0118NM issued on October 13, 1987 to PVUC contained a permit condition requiring all treated effluent from the Ponte Vedra WWTP to be disposed on the Ponte Vedra Golf Course when the WWTP's average daily flow (adf) reached 0.3 MGD.

At present, the Ponte Vedra WWTP is discharging treated effluent to two percolation ponds which have a combined percolate capacity of 0.2 MGD. Disposal on the golf course can be an environmentally sound and economically beneficial solution for both the Golf Course and the utility operating the Ponte Vedra WWTP.

In connection with its acquisition of the Ponte Vedra utility system, United Water Florida obtained an agreement for disposal of its treated effluent on the Golf Course, which would enable it to comply with the CUP permit. If United Water Florida does not dispose of its treated effluent through the Ponte Vedra Golf Course, United Water Florida would have to provide advanced wastewater treatment at a cost of several million dollars, and then dispose of the treated effluent to the waters of the state. Furthermore, the disposal to the waters of the state (e.g., the Intercoastal Waterway) would have required expensive and time consuming anti-degradation studies. United Water Florida avoided such costs by arranging to dispose of its treated effluent on the Ponte Vedra Golf Course. Although the agreement provides that United Water Florida shall not make application for the right to charge Ponte Vedra Golf Course for the treated effluent, Ponte Vedra Golf Course has significantly accommodated United Water Florida by providing a place for United Water Florida to dispose of its treated effluent. The agreement also requires Ponte Vedra Golf Course, not United Water Florida, to pay for the irrigation system. By entering into the contract and disposing of its treated effluent through reuse service to the golf course, United Water Florida has significantly reduced its cost of effluent disposal. Accordingly, entering into the contract was a prudent decision. In

addition, the agreement specifically provides that the Ponte Vedra Golf Course "shall abide by and pay for the treated effluent in accordance with the provisions of [United Water Florida's]... tariff regarding payment for treated effluent as required by applicable regulatory authority."

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QUESTION 26:

Section 367.0817(3), Florida Statutes, states:

All prudent costs of a reuse project shall be recovered in rates. The Legislature finds that reuse benefits water, wastewater, and reuse customers. The Commission shall allow a utility to recover the costs of a reuse project from the utility's water, wastewater, or reuse customers or any combination thereof as deemed appropriate by the Commission.

It is not clear from the utility's application how the utility is proposing to allocate the costs of the Ponte Vedra reuse project.

- (a) Please provide a breakdown of all of the costs associated with the Ponte Vedra reuse project (e.g., plant, operation and maintenance expenses, etc.)
- (b) Please explain how these costs have been allocated to the water and/or wastewater customers.
- (c) Please explain why the utility believes the golf course should not be required to pay any of the costs of providing reuse.
- (d) Please provide an estimate of the annual number of gallons of effluent that the utility anticipates will be provided to the golf course.

RESPONSE 26:

- (a) The following are United Water Florida's capital costs required for providing treated effluent for disposal to the Ponte Vedra Golf Course.

1.	12" DR 18 PVC Mains	\$ 150,000
2.	Effluent Filter and UV Systems	<u>\$1,357,100</u>
	Total Capital Costs	\$1,507,100

See information for CEA Nos. C98R004 and C98S001 in United Water Florida's Responses to Deficiency Letter June, 1998, Deficiency No. 3.

At this time, the operation and maintenance expenses can not be specifically separated between reuse service and wastewater service.

- (b) Since United Water Florida considers this project to be a means for the disposal of treated effluent, similar to effluent disposal at wastewater treatment facilities that do not provide reuse, United Water Florida has allocated all the costs related to this project to wastewater customers.
- (c) United Water Florida believes that based on the unique facts this particular instance, it is appropriate not to charge Ponte Vedra Golf Course for reuse water. Ponte Vedra has made a significant accommodation to United Water Florida by agreeing to accept the treated effluent. See the response to Question No. 25 for more information on the unique facts of this case.
- (d) The average annual quantity of wastewater treated at Ponte Vedra WWTF for the years 1995, 1996, and 1997 is 156.764 Million Gallons with an average daily flow of 429,490 gallons. United Water Florida anticipates this amount to increase to 0.9 MGD in the future.

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Question 27:

According to Page 6 of Schedule G-44 of the application, if metering is required, UWF will be responsible for installing the meter facilities. Please provide an estimate of any additional costs that the utility will incur in the provision of reused water to Ponte Vedra Golf Course in the event the Commission determines that a rate should be charged for the reused water service.

Response 27:

UWF does not anticipate providing any additional metering of the reuse water. Metering facilities already exist at the Ponte Vedra WWTP. Since the golf course will be receiving 100% of the effluent produced by the Ponte Vedra WWTP, the plant flow meter will be used.

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Question 28:

Staff has been informed by the St Johns River Water Management District (SJRWMD) that the Ponte Vedra Golf Course will also receive effluent from the St. Johns Service Corporation. Will the St. Johns Service Corporation be charging rates for the reused water service? If yes, please provide the rates if possible.

Response 28:

St Johns Water Service and the Ponte Vedra Golf Course entered into a separate agreement regarding reuse water service. To the best of our knowledge, St Johns Water Service Corporation will not be charging a rate for supplying reuse water to the golf course.



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Public Service Commission  
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Question 29:

Staff has been informed by the SJRWMD that the utility might qualify to receive funding for reuse projects. Please indicate whether the utility has applied to WMD for funding for the Ponte Vedra reuse project or any other reuse/conservation projects.

- a. If yes, please explain the status of the application (e.g., still under review, was denied, was approved for a certain amount, etc.).
- b. If no, please explain why the utility has not applied for funding and if it plans to apply in the future.

Response 29:

At the present time United Water Florida (UWF) has not applied for funding through the SJRWMD. The SJRWMD has indicated that funds may be available for reuse projects. SJRWMD funds for fiscal year 1998 had already been allocated for other SJRWMD projects. It is the intent of UWF to apply for possible funding during fiscal year 1999.

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Question 30:

Staff has been informed by the SJRWMD that the utility will be constructing a regional wastewater treatment plant to replace the St. Johns North and St. Johns Forest plants. The effluent from the regional plant will be disposed of in wetlands. Please explain why the utility will not be providing reuse from the new regional facility, and whether or not it anticipates providing reuse from that facility in the future.

Response 30:

United Water Florida (UWF) will be constructing a new WWTP known as the Blacks Ford Regional WWTP and will replace the existing St Johns Forest WWTP. The plant will be designed and constructed to treat effluent to advanced wastewater treatment levels and discharge to a receiving wetland. It is less costly for UWF to dispose of the treated effluent through a receiving wetland than through reuse. At this time, UWF does not anticipate providing reuse from the Blacks Ford Regional WWTP until it becomes economically feasible. The treated effluent will be suitable for reuse purposes. UWF supports the efforts of the SJRWMD to supply reuse water to golf courses. However, there are many unresolved issues regarding the supply of reuse water. UWF is not aware of any regulations or ordinances in place within UWF's service area that require golf courses to use reuse water for irrigation purposes. In addition, the inclusion of system upgrades in rate base and the recovering of reuse costs has not been fully established by the PSC. Without guidance in these areas, there is uncertainty as to how UWF would recover costs associated with providing reuse water. UWF understands the PSC is currently investigating the matter with workshops, etc. See response to Question #35.

State of Florida  
Public Service Commission  
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Staff Data Request -2nd Set

Question 31:

Staff has been informed by the SJRWMD that the utility is currently providing reused water service from its St Johns Forest wastewater treatment plant to the Cimmarone Golf Course. However, the reused water service will be discontinued when the regional plant is placed in service and the St. Johns Forest plant is taken off line.

- a. Does the utility anticipate being able to provide reused water service to the Cimmarone Golf Course again in the future?
  1. If yes, please indicate when the utility anticipates that the reused water service will be available.
  2. If no, please explain why this service will not be available.
- b. Does the utility have a contract with the Cimmarone Golf course for the current provision of reused water service? If yes, please provide a copy of the contract.
- c. Has the utility assessed any charges for the reused water service to the Cimmarone Golf Course?

Response 31:

- a. United Water Florida was directed by the Florida Department of Environmental Protection to cease using its percolation ponds at its St. Johns Forest WWTP and to dispose of the treated effluent to a pond in the Cimarrone Golf Course. United Water Florida was disposing of its treated effluent, not providing reuse service. Its use of the disposal site is temporary and will cease upon completion of the Blacks Ford Regional WWTP and the elimination of the St. Johns Forest WWTP. United Water Florida anticipates that it will provide reuse service in the St. Johns Forest area when reuse becomes, among other things, economically feasible. United Water Florida will be seeking contributions from developers for the installation of a reuse force main from the Blacks Ford Regional WWTP to provide reuse service in the St. Johns Forest area including the Cimmarone Golf Course.
- b. No.
- c. No.

State of Florida  
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Question 32:

Staff has been informed by the SJRWMD that there is a possibility that the utility could provide reused water service to a golf course near its San Jose wastewater treatment plant. According to the SJRWMD, the utility indicated a year ago that this reuse project was feasible and the cost estimated to be approximately \$650,000.

- a. Is the utility planning to provide reused water service from its San Jose wastewater treatment plant?
  1. If no, please explain why not.
  2. If yes:
    - (a) Has the utility entered into a contract with the golf course for the provision of reused water service?
      - (1) If yes, please provide a copy of the contract.
      - (2) If no, please indicate when the utility anticipates entering into a contract with the golf course.
    - (b) When does the utility anticipate that it will begin providing reused water service?
    - (c) Are the costs of this reuse project included in the utility's application?
    - (d) Does the utility anticipate charging rates for this service? If yes, please explain.

Response 32:

- a. United Water Florida (UWF) has been contacted by the San Jose Golf Course regarding the possibility of providing reuse water. The golf course has a reuse water demand of 0.300 to 0.600 mgd as compared to the average flows from the San Jose WWTP of 1.8 mgd. The current estimated capital cost to provide reuse water is approximately \$750,000.
  1. UWF is not planning at this time to provide reuse water to the San Jose golf course from its San Jose wastewater treatment plant. Currently representatives of the golf course and UWF are exploring the possibility of providing reuse water sometime in the future. Many issues must be resolved

Response 32 (continued):

including who will pay for the capital costs, before UWF will provide reuse service to the San Jose Golf Course. Currently, it is not feasible to provide such reuse service.

2.

- a. Not applicable.
- b. Not applicable.
- c. Not applicable.
- d. Not applicable.

State of Florida  
Public Service Commission  
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Question 33:

Is the utility required by the DEP or the WMD to implement reuse for any of its systems other than the Ponte Vedra system addressed in No. 6 above? If yes please specify what is required, by which agency, and for which systems.

Response 33:

United Water Florida is currently not required by either the DEP or WMD to implement reuse for any of its systems other than Ponte Vedra.

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Question 34:

Please provide the utility's master plan, if any, regarding the future provision of reused water service.

Response 34:

A copy of UWF's Reuse Feasibility Study is provided under separate cover.

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QUESTION 35:

Please describe the utility's plan regarding future reused water rates (e.g., does the utility plan to request a zero rate for all reuse customers, does the utility plan to address reuse rates separately for each reuse customer, does the utility plan to use a uniform reuse rate for all reuse customers)?

RESPONSE 35:

It is United Water Florida's understanding that the Florida Public Service Commission has required its Staff to open a generic docket on reuse and that the Staff is conducting workshops on reuse. Reuse is an evolving area with many issues, including the development of an appropriate methodology for utilities to use in recovering their costs in providing reuse. United Water Florida supports the goals of reuse, including the preservation of the potable water supply, but United Water Florida must not provide reuse in a manner or method economically harmful to its customers or to itself. Because of the uncertainty in the area, United Water Florida intends to review all reuse matters on a case by case basis, at least until the Florida Public Service Commission provides further direction to the industry.



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Public Service Commission  
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QUESTION 36:

Please describe any other potential reuse customers not discussed in previous responses. Please specify which system will provide the reused water service and when the utility anticipates these reuse customers will be served.

RESPONSE 36:

Please review the copy of United Water Florida's Reuse Feasibility Study provided in the Response to Question 34. As set forth in the response to Question 35, United Water Florida will review reuse matters on a case by case basis. At this time, United Water Florida is not aware of any potential reuse customers for which reuse service is economically and technically feasible, except the Ponte Vedra Golf Course.

State of Florida  
Public Service Commission  
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Staff Data Request -2nd Set

Question 37:

Staff has been informed by the SJRWMD that approximately a year ago the utility entered into a Memorandum Of Understanding (MOU) with the Jacksonville Electric Authority (JEA) which allows the JEA to provide reused water service within United Water's Service territory.

- a. Please provide a copy of the MOU.
- b. Does the utility anticipate entering into other such agreements with the JEA or other utilities near UWF's service territory? If yes, Please explain.

Response 37:

- a. A copy of the MOU is enclosed. Please note that this is a resolution adopted by the City Council.
- b. UWF does not plan to enter into any other such agreements with the JEA or other such utilities.

Response to Q. 37

JEU  
KEH  
TEP  
SDK  
GB

1 Introduced by the Council President at the request of the Mayor:

2  
3  
4 RESOLUTION 97-127 -A

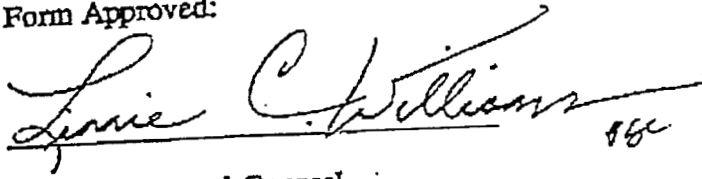
5 A RESOLUTION AUTHORIZING AND DIRECTING THE  
6 MAYOR AND CORPORATION SECRETARY, OR THEIR  
7 DESIGNEES, TO EXECUTE AN AGREEMENT WITH UNITED  
8 WATER FLORIDA INC. CONCERNING THE REUSE OF  
9 RECLAIMED WATER; PROVIDING AN EFFECTIVE DATE.

10  
11 Be It Resolved by the Council of the City of Jacksonville:

12 Section 1. The Mayor, or his designee, and Corporation Secretary are hereby  
13 authorized to execute an agreement with United Water Florida, Inc. concerning the reuse of  
14 reclaimed water described on the attachment hereto as Exhibit A and made a part hereof.

15 Section 2. This resolution shall become effective upon signature by the Mayor or upon  
16 becoming effective without the Mayor's signature.

17 Form Approved:

18   
19  
20

21 Assistant General Counsel

22 LINDA SCHEWY (WILLIAMS) 7/1/88 10:08 AM

Post-It™ brand fax transmittal memo 7671		# of pages 2	
To Linda Smith	From Tim Perkins	Co. JEA	
Co. United Water	Phone # 630-0786		
Dept.	Fax # 630-0784		
Fax #			

**AGREEMENT BETWEEN THE CITY OF JACKSONVILLE  
AND  
UNITED WATER FLORIDA INC.  
CONCERNING THE REUSE OF RECLAIMED WATER**

**WHEREAS**, the City of Jacksonville ("City") and United Water Florida Inc. ("UWFL") independently own and operate water and wastewater systems within certain designated areas of Duval County, Florida; and

**WHEREAS**, City and UWFL believe that implementation of a reclaimed water system is in the public interest in order to preserve the ground waters of the County for use in potable water supply and to reduce wastewater discharges into the St. Johns River and its tributaries; and

**WHEREAS**, City and UWFL wish to enter into a joint arrangement to provide cost-effective reuse of reclaimed water

**NOW, THEREFORE**, that the City and UWFL hereby agree as follows:

1. The City and UWFL will use their best efforts to implement a reclaimed water reuse program (Reuse Program) in Duval County, provided that such program is technically, economically and environmentally feasible and receives the approval of all regulatory agencies and other governmental bodies having jurisdiction.
2. The Reuse Program shall, to the extent permitted by law, will be operated so as to maximize the cost-effective reuse of reclaimed water to offset demand on the Floridan aquifer and decrease wastewater discharges to the St. Johns River and its tributaries.

3. The Reuse Program may be implemented on a comprehensive basis or on a project-by-project basis, as may be mutually agreed by the City and UWFL.
4. The City and UWFL may provide wholesale reclaimed water service to one another where it is found to be technically, economically and environmentally feasible to do so. The wholesale rates for reclaimed water service will be established by the supplier after receipt of a request for wholesale service and will be stipulated in a written service agreement.
5. The City and UWFL may construct reclaimed water transmission mains through one another's service areas, but provision of reclaimed water service to customers within each utility's service area will be limited to the utility in control of the service area.
6. The City and UWFL will separately establish retail service rates and conditions of service for reclaimed water use within their respective service areas.
7. All terms, conditions and agreements implementing the Reuse Program contemplated thereunder between the City and UWFL shall be subject to approval of the City Council of the City of Jacksonville and the UWFL Board of Directors.
8. All terms, conditions and agreements implementing the Reuse Program shall be subject to the approval of the Florida Public Service Commission and federal, state and local government bodies having jurisdiction.
9. This Agreement may be amended only when mutually agreed upon in writing by both parties.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement this \_\_\_\_\_ day of \_\_\_\_\_, 1996.

ATTEST:

CITY OF JACKSONVILLE  
a municipal corporation

\_\_\_\_\_  
Linnie C. Williams  
Corporation Secretary

By: \_\_\_\_\_  
John Delaney, Mayor

WITNESSES:

UNITED WATER FLORIDA INC.

Shannon J. Smith (sign)

By: M. Sambamurthi  
Munipalli Sambamurthi  
Vice President and General  
Manager

SHANNON J. SMITH (print)

Shannon J. Smith (sign)

SHANNON J. SMITH (print)

RESOLUTION 97-127-A

CERTIFICATE OF AUTHENTICATION

ADOPTED BY THE COUNCIL

FEBRUARY 25, 1997

*Eric Smith*

ERIC SMITH  
COUNCIL PRESIDENT

ATTEST:

*Beverly S. Domen*

BEVERLY S. DOMEN, CMC  
COUNCIL SECRETARY

APPROVED: FEB 28 1997

*[Signature]*  
JOHN DELANEY, MAYOR

