

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment of Certificate No. 226-S to add territory in Seminole County by Florida Water Services Corporation.

DOCKET NO.: 971638-SU
FILED:

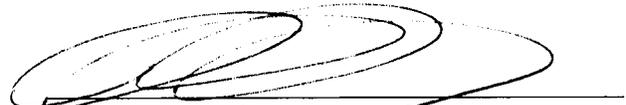
ORIGINAL

NOTICE OF SERVICE OF ANSWERS TO INTERROGATORIES TO CITY OF LONGWOOD

COMES NOW the City of Longwood, by and through its undersigned attorney, and states that the original and seven (7) copies of the Interrogatories, from The Staff of the Florida Public Service Commission, dated November 10, 1998, together with the Answers thereto have been provided this 18th day of December, 1998, to the attorney for The Staff of the Florida Public Service Commission.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail this 18th day of December, 1998, to: Jennifer S. Brubaker, Staff Attorney, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 and Matthew Feil, Esquire, 1000 Color Place, Apopka, Florida 32703-7797.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG Brubaker
- GIN _____
- OPC _____
- SCH _____
- SEC 1
- WAS 2
- OTH _____



Richard S. Taylor, Jr. Esquire
531 Dog Track Road
Post Office Box 1117
Longwood, Florida 32752
Florida Bar No.: 221686
Telephone: (407) 339-7888
Attorney for The City of Longwood

DOCKETED DATE

14334 DEC 21 8

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment
of Certificate No. 226-S to add
territory in Seminole County by
Florida Water Services
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COMMISSION STAFF'S FIRST SET OF INTERROGATORIES TO
THE CITY OF LONGWOOD

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby propounds the following interrogatories, numbered one through thirteen, to the City of Longwood, pursuant to Rule 1.340, Florida Rules of Civil Procedure. These interrogatories shall be answered under oath by the City of Longwood or its agent who is qualified to answer and who shall be fully identified, within thirty (30) days.

INSTRUCTIONS

A. The following interrogatories refer to the City of Longwood's Wastewater Treatment and Facilities which would be used to serve the proposed area in question in Docket No. 971638-SU.

B. The City of Longwood shall answer these interrogatories to the fullest extent possible and shall furnish all information which is reasonably available to the City of Longwood, its principals, agents, attorneys, affiliates or other representatives.

C. If the City of Longwood cannot answer a particular interrogatory in full, after exercising due diligence to secure the information to do so, it should state the answer to the extent possible and specify why it is unable to answer the remainder. In addition, the City of Longwood shall state whatever information or knowledge that it has concerning the unanswered portion.

D. If the requested information is not applicable, that response should be reported as well as the reason why. If the requested information is not available, that response should be reported as well as the reason why.

E. Please report the name(s) of each person responding to each of the following interrogatories, the business address and telephone number of each such person, and the relationship of each person to the City of Longwood. Also, identify which interrogatory each such person has answered.

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
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DOCKET NO. 971638-SU

INTERROGATORIES

1. Please discuss whether the City of Longwood's wastewater treatment plant is in compliance with all rules and regulations of the Department of Environmental Protection.

Yes. The City of Longwood is a wholesale customer of Seminole County Environmental Services. All wastewater within the City service area is treated by Seminole County. To the best of our knowledge and belief Seminole County is in compliance with all rules and regulations of the Department of Environmental Protection.

Answered by Richard Kornbluh, Division Manager, Utilities, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
TO THE CITY OF LONGWOOD
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2. Please discuss whether the City of Longwood's wastewater treatment plant is under any enforcement action with the Department of Environmental Protection.

N/A. See #1.

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

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3. Please complete the following table for rates and charges on the following pages.

Service Availability Charges for a 5/8" x 3/4" Meter	
Description	City of Longwood Wastewater
System Capacity Charge	\$ 11.50/gallon/day
Main Extension Charge	\$ N/A
Water - Service Installation Charge per connection	\$ 450.00
Wastewater - Service Installation Charge per connection Paved 6 inch	\$ 750.00 commercial \$ 550.00 residential
Plant Capacity Charge	\$ N/A
Other Charges	\$
	\$
	\$
Total	\$

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
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City of Longwood's Rates and Charges for a 5/8" x 3/4" Meter	
Wastewater	
Base Facility Charge for a 5/8" x 3/4" Meter	\$ 31.70 flat rate - residential \$ 31.70/1st 9,000 gallons
Gallonage/1,000 gallons	9,001 - 10,000 - \$18.66 18,001 - 23,000 - \$4.20 10,001 - 13,000 - \$3.85 23,001 - 28,000 - \$4.38 13,001 - 18,000 - \$4.03 28,001 - 33,000- \$4.55 33,001 - 40,000 - \$4.73 40,001 - up per thou - \$4.90
Other Charges	
Typical Bill using 5,000 gallons	\$31.70
Typical Bill using 10,000 gallons	\$50.36

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East
 Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

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4. With respect to the proposed service area, please complete the following table for estimated construction cost.

Example Table:

Item No.	Size	Description	Units	Quantity	Unit Cost	Cost
1	8 inch	PVC pipe Gravity Line	LF	1000	\$10	\$10,000
2	8 inch	Service Lateral	EA.	1	\$500	\$500
3	6 foot	Manhole	EA.	2	\$2,500	\$5,000
4	4 inch	Force Main	LF	500	\$10	\$5,000
					Total	\$20,500

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

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City of Longwood Construction Cost Table

Item No.	Size	Description	Units	Quantity	Unit Cost	Cost
1	8"	PVC pipe - Gravity Line	LF	1900	\$25.00	\$47,500
2	6"	Service Lateral	EA	23	350	8,050
3	4'	Manhole	EA	7	2,000	14,000
4	4"	Force Main	LF	1800	18	32,400
5	6'	Lift Station	EA	1	40,000	40,000
6	16"	Jack and Bore	EA	1	10,000	10,000
7		Mobilization	LS	1	5,000	5,000
8		Repaving	LS	1	50,000	50,000
9		MOT	LS	1	10,000	10,000
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
					Total	216,950

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

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5. Please identify how far away in miles or feet the City of Longwood's wastewater collection lines are from the proposed service area.

The nearest gravity sewerline is 1100' east of Bennett Drive.

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

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6. Please identify how far away in miles or feet the City of Longwood's wastewater force mains are from the proposed service area.

The nearest force main is 1400' East of Bennett Drive.

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
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7. Please specify what the capacity is of the City of Longwood's wastewater treatment plant.

N/A. See #1

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180
East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
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8. Please specify what the committed capacity (reserved for future customers) is and the current wastewater treatment flow of the City of Longwood's wastewater treatment plant.

The City of Longwood, through Seminole County, has a total capacity of 1.2 mgD available. Currently there is 464,000 gallons per day on line, 38,946 GPD reserved for projects not yet on line, 15,471 gallons per day reserved and uncommitted and the remainder available for purchase as per our agreement with Seminole County.

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

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9. Please discuss whether the City of Longwood provides wastewater reuse. If so, please discuss where and to how many customers.

No reuse is available.

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

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10. If the City of Longwood provides wastewater reuse, please discuss whether the area near the proposed area would receive wastewater reuse service.

N/A.

Answered by Richard Kornbluh, Division Manager, Utilities Division, 180 East Warren Avenue, Longwood, Florida 32750; Telephone: (407) 263-2388

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11. According to Exhibit A of the application by Florida Water Service Corporation (FWSC) states, "Prior to 1994, the City of Longwood requested that Florida Water Services include the proposed service area into its certificated area." Please explain or clarify the history behind that statement.

The City of Longwood has researched its records and there is no written documentation that the City of Longwood requested or granted permission to Florida Water Service to include the proposed service area into its certificated area. Florida Water Services has stated on several occasions that it has a letter or other written documentation concerning this statement. However, Florida Water Services has failed to produce said letter or written documentation despite numerous requests by the City of Longwood.

Upon investigation the City of Longwood has determined that prior to 1994 a representative of Southern States Utilities (the owner of the subject service area at that time) approached the City of Longwood and asked if the City of Longwood would be interested in having Southern States Utilities expand its sewer service into the subject area. Although the subject area was and is in the City of Longwood Comprehensive Master Wastewater Collection Plan dated April, 1988, Rev. April 1989, the City of Longwood did not plan to expand into the subject area for a few years. Since there was a need for sewer service in the subject area the representative of the City indicated that the City of Longwood may look favorable upon such an application. Thereafter, there was no further communication and no formal request of the City of Longwood or to the Public Service Commission to expand the service into the subject area. It is now over five (5) years later and the City of Longwood is now ready, willing and able to expand its sewer service into the subject area. The City of Longwood has the engineering for the project budgeted for FYI 1998 - 1999 and continuation budgeted for 1999 - 2000. The City of Longwood may complete the expansion during the later half of 1999, subject to the outcome of this application.

The City of Longwood has already applied for the permission to run its sewer line under the CSX railroad track. Cost estimates are \$10,000.00 to complete the placement of sewer pipe under the CSX railroad track.

Answered by Richard S. Taylor, Jr., City Attorney for City of Longwood based on information received from Geraldine Zambri, City Clerk and Richard Kornbluh, Division Manager. Address: 531 Dog Track Road, P.O. Box 1117, Longwood, FL 32752. Telephone: (407) 339-7888

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12. FWSC states that it believes its application is in compliance with the wastewater section of the Seminole County Comprehensive Plan. Please discuss whether the City of Longwood believes that the amendment application is in compliance with the Seminole County Comprehensive Plan, and explain specifically how it is or is not in compliance.

The City of Longwood does not believe that FWSC's application is in compliance with the wastewater section of the Seminole County Comprehensive Plan. The disputed area is within the City limits (boundaries) of the City of Longwood. The subject area is in compliance with the wastewater section of the City of Longwood Comprehensive Plan.

Answered by John Brock, Director of Department of Community Services, 174 West Church Avenue, Longwood, Florida 32750; Telephone: (407) 260-3463

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13. Please discuss whether the City of Longwood believes this amendment application is in compliance with the established local comprehensive plans developed pursuant to Florida Statute Section 163.3161 - 163.3211, and explain specifically how it is or is not in compliance.

The City of Longwood does not believe the amendment application is in compliance with the established local comprehensive plan developed pursuant to Florida Statute Section 163.316-163.3211. The local comprehensive plan clearly adopts the Comprehensive Master Wastewater Collection Plan, April 1988, Rev. April 1989. Said plan clearly provides for the City of Longwood to expand its wastewater service into the area contained in the amendment application. Therefore to grant the amendment application would not be consistent with the local comprehensive plan.

Answered by John Brock, Director of Department of Community Services, 174 West Church Avenue, Longwood, Florida 32750; Telephone: (407) 260-3463

DATED:

Nov. 10, 1993



Jennifer S. Brubaker, Staff Attorney
Bureau of Water and Wastewater
Division of Legal Services
Florida Public Service Commission

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
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I HEREBY DECLARE that the responses to the above interrogatories are true and correct to my best knowledge and belief.

The City of Longwood
c/o Richard S. Taylor, Esquire
531 Dog Track Road
Longwood, Florida 32752-1117

By:


RICHARD KORNBLUT

STATE OF FLORIDA

COUNTY OF SEMINOLE

SWORN to and subscribed before me at LONGWOOD, SEMINOLE
County, Florida, this 15th day of DECEMBER, 1998.


Notary Public
State of Florida
My Commission Expires:

(S E A L)

JSB

