



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

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OCT 29 PM 3:17
RECORDS AND REPORTING

ORIGINAL

October 29, 1999

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

RE: Docket No. 960545-WS

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Citizens' Prehearing Statement for filing in the above-referenced docket.

Also enclosed is a 3.5 inch diskette containing Citizens' Prehearing Statement in WordPerfect for Windows 6.1. Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Harold McLean
Associate Public Counsel

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS 2 _____
- OPC 3 _____
- PAI _____
- REC 1 _____
- WAW _____
- OTH _____

HM/dsb
Enclosures

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13308 OCT 29 99

RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re Investigation of Utility)
rates of Aloha Utilities, Inc.)
In Pasco County, Florida.)
_____ /

DOCKET NO. 960545-WS

FILED: October 29, 1999

CITIZENS' PREHEARING STATEMENT

The Citizens of the State of Florida, by and through JACK SHREVE, Public Counsel,
(Citizens) file their Prehearing Statement as say as follows:

WITNESSES:

1. All Known Expert Witnesses:

Ted L. Bidy
2308 Clara Kee Boulevard
Tallahassee, Florida 32303

Mr. Bidy has prefiled fourteen pages of testimony.

EXHIBITS:

2. All Known Exhibits:

The Citizens will offer five composite exhibits in the direct testimony of Mr. Bidy. The Composite exhibits are designated TLB-1 through TLB-5, and are attached to the direct testimony of Mr. Bidy referenced above.

The Citizens reserve the right to offer exhibits supporting cross examination of adverse witnesses where appropriate.

POSITIONS:

3. Basic Position:

The Commission has found Aloha's quality of service unsatisfactory. The Citizens believe, and will offer evidence that it remains so. Moreover, the Citizens will show that the proposed remedy submitted by Aloha is unrealistically grandiose, and that a far more modest and cheaper remedy is available to Aloha.

DOCUMENT NUMBER-DATE

13308 OCT 29 99

FPSC-RECORDS-REPORTING

4. Issues and Citizens' Position:

Issue 1: Is the quality of service offered by Aloha still unsatisfactory?

Position: Yes.

Issue 2: Under the circumstances of this case, what remedial measures are appropriate for Aloha to undertake?

Position: Aloha should install pressure filters where technically feasible.

Issue 3: Should Aloha be ordered by the Commission to undertake a comprehensive test to establish whether its water is unduly injurious to the plumbing of customers' homes.

Position: Yes.

OTHER MATTERS:

Pending Motions:

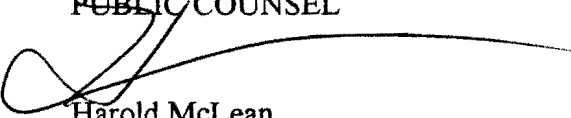
The Citizens are aware of no pending motions/

Stipulations and matters with which the parties cannot comply:

The Citizens are aware of neither stipulated items, nor requirement of the proposed prehearing order with which it cannot comply.

Respectfully submitted,

JACK SHREVE
PUBLIC COUNSEL



Harold McLean
Associate Public Counsel
111 W. Madison St.
Tallahassee, Florida 32399

Attorney for the Citizens of the
State of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing INTERVENORS' SECOND MOTION FOR MORE TIME TO PROVIDE PREFILED TESTIMONY has been served by United States Mail or (*) by hand delivery upon the following parties on this the 29th day of October, 1999:

Ralph Jaeger, Esquire(*)
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

F. Marshall Deterding, Esquire
John L. Wharton, Esquire
Rose, Sundstrom & Bentley, LLP
2548 Blirstone Pines Drive
Tallahassee, FL 32301

Representative Mike Fasano
8217 Massachusetts Avenue
New Port Richey, FL 34653

A handwritten signature in black ink, appearing to read 'Harold McLean', is written over a horizontal line.

Harold McLean
Assistant Public Counsel