

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment of Certificate No. 106-W to add and delete territory in Lake County by Florida Water Services Corporation.

DOCKET NO. 990054-WU

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the Commission Staff's First Set of Interrogatories to Crystal River Utilities, Inc., numbered one through eleven, has been furnished to Martin Friedman, Esquire, Rose, Sundstrom & Bentley, LLP, 2548 Blairstone Pines Drive, Tallahassee, Florida 32301, and that a true and correct copy thereof has been furnished to Matthew J. Feil, Esquire, P.O. Box 609520, Orlando, Florida 32860-9520 by U.S. Mail, this 3rd day of December, 1999.

Samantha M. Cibula

Samantha Cibula, Staff Attorney
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
(850) 413-6199

AFA	_____
APP	_____
CAF	_____
CMU	_____
CTR	_____
EAG	_____
LEG	_____
MAS	_____
OPC	_____
RRR	_____
SEC	<u> I </u>
WAW	_____
OTH	_____

DOCUMENT NUMBER-DATE

14809 DEC-3 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment
of Certificate No. 106-W to add
and delete territory in Lake
County by Florida Water Services
Corporation.

DOCKET NO. 990054-WU
ISSUED: DECEMBER 3, 1999

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES TO
CRYSTAL RIVER UTILITIES, INC.

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

INSTRUCTIONS

A. Crystal River shall answer these interrogatories to the fullest extent possible and shall furnish all information which is reasonably available to Crystal River, its principals, agents, attorneys, affiliates or other representatives.

B. If Crystal River 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, Crystal River shall state whatever information or knowledge that it has concerning the unanswered portion.

C. 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.

D. If the utility is an operating division of a larger company, but separate records permit isolation of the subject utility system, the utility's response to these interrogatories may reflect such information. For example, cost of capital information for the utility may be on a divisional basis and similar

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information for the combined company will be reported under the heading "parent company." This adaptation should be disclosed in the utility's response.

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 Crystal River. Also, identify which interrogatory each such person has answered.

F. If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

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INTERROGATORIES

1. Please provide the following information about your wells.
 - A. The number of wells.
 - B. Size in inches of the well diameters.
 - C. The maximum capacity in gallons per minute (gpm) and gallons per day (gpd) of the wells. Provide your calculations.
 - D. The existing peak hour and peak day water flows in gpm of the wells.
 - E. The remaining capacity of the water wells in gpm and gpd.
 - F. Does the water treatment plant have/provide fire flow? Please explain.
 - G. The number and capacity of each high service pump.
 - H. The number and size of the hydro pneumatic tank(s).
 - I. The size of the ground storage tank, if applicable.

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2. Please indicate the size of the water lines that are in place to serve the area.

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3. Please provide the status of the negotiations between Florida Water and Crystal River. Has there been any discussions regarding the potential sale of the utility?

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4. What is the maximum number of residential customers the utility could add to the disputed service area from the present water treatment plant?

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5. Does Crystal River have any plans to provide wastewater service to this area? Please discuss.

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6. What system equipment, such as an automatic generator, does Crystal River have to respond to a power outage?

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7. Please provide information with respect to Crystal River's technical ability to serve the proposed area in Lake County.

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8. How long would it take Crystal River to provide water service to the area at issue (see POD number 1)? Please discuss if fire protection would be provided.

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9. What water system upgrades does Crystal River have planned for this water system?

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10. Please provide and discuss any information that indicates that it may be more appropriate for Crystal River to provide service to the protested area than another utility company.

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11. Please review the following charts on service availability charges and monthly water service charges which are reflected in the utility's tariff. Please affirm that the rates and charges are correct and that these are the rates and charges the utility intends to charge customers in the proposed expansion area. If the charges are incorrect, please provide the correct rates and charges.

Service Availability Charges for a 5/8" x 3/4" Meter	
Description	Crystal River - Haines Creek Water System
System Capacity Charge	None
Main Extension Charge	See below (1)
Meter Installation Charge	\$ 90.00
Water - Service Installation Charge per connection	\$ -
Plant Capacity Charge	\$ -
Total	\$ 90.00

(1) Crystal River's tariff allows the utility to enter into developer agreements or refundable advance agreements for the utility's distribution system.

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<u>Water Monthly Service Rates</u> for a 5/8" x 3/4" Meter	
	Crystal River - Haines Creek Water System
Base Facility Charge	\$ 8.62
Gallonge Charge per 1,000 gallons:	\$ 1.32
Typical Bills:	
0 gallons	\$ 8.62
5,000 gallons	\$ 15.22
10,000 gallons	\$ 21.82

DATED: 12-3-99.

Samantha M Cibula
 Samantha Cibula, Staff Attorney
 Bureau of Water and Wastewater
 Division of Legal Services
 Florida Public Service Commission

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I HEREBY DECLARE that the responses to the above
interrogatories are true and correct to my best knowledge and
belief.

Crystal River Utilities, Inc.
c/o Martin Friedman, Esquire
Rose, Sunstrom, & Bentley, LLP
2548 Blainstone Pines Drive
Tallahassee, Florida 32301

By: _____

STATE OF FLORIDA

COUNTY OF _____

SWORN to and subscribed before me at _____,
County, Florida, this _____ day of _____, 19__.

Notary Public
State of Florida
My Commission Expires:

(S E A L)