

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

ORIGINAL

STEPHEN A. ECENIA
JOHN R. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
J. STEPHEN MENTON
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

OF COUNSEL:
CHARLES F. DUDLEY

GOVERNMENTAL CONSULTANTS:
PATRICK R. MALOY
AMY J. YOUNG

June 2, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

RECEIVED-FPSC
00 JUN -2 PM 1:45
RECORDS AND REPORTING

Re: Docket Nos. 992040-WS and 990696-WS

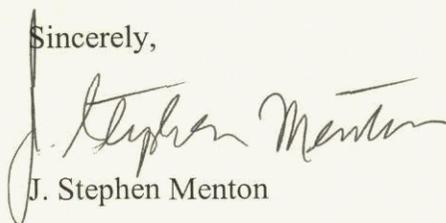
Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced dockets on behalf of JEA is:

1. The original and fifteen copies of the rebuttal testimony of Timothy E. Perkins.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely,


J. Stephen Menton

JSM/knb
Enclosures
cc: All Parties of Record

Leg-2
R60
COM-5+orig
SC-1

RECEIVED & FILED
Kf
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
06749 JUN-28
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Applications For an Amendment)
Of Certificate For An Extension)
Of Territory And For an Original)
Water and Wastewater Certificate)
(for a utility in existence and)
charging for service))

Docket No. 992040-WS

In Re: Application by Nocatee Utility)
Corporation for Original Certificates)
for Water & Wastewater Service in)
Duval and St. Johns Counties, Florida)

Docket No. 990696-WS

REBUTTAL TESTIMONY

OF TIMOTHY E. PERKINS, APPEARING

ON BEHALF OF

JEA

DOCUMENT NUMBER-DATE

06749 JUN-28

FPSC-RECORDS/REPORTING

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Timothy E. Perkins. My business address
3 is 21 Church Street, Jacksonville, Florida 32202-
4 3139.

5 Q. BY WHOM ARE YOU EMPLOYED?

6 A. I am employed by JEA.

7 Q. WHAT IS YOUR POSITION WITH JEA?

8 A. My current position is Vice President,
9 Environmental.

10 Q. HAVE YOU PREVIOUSLY PROVIDED PREFILED DIRECT
11 TESTIMONY IN THESE DOCKETS ON BEHALF OF JEA?

12 A. Yes.

13 Q. IN YOUR DIRECT TESTIMONY, DID YOU SET FORTH YOUR
14 QUALIFICATIONS AND EXPERIENCE?

15 A. Yes.

16 Q. HAS THE NATURE OF YOUR WORK FOR JEA CHANGED SINCE
17 THE FILING OF YOUR DIRECT TESTIMONY?

18 A. No. I still oversee the preparation of permit
19 applications and participate in the permitting
20 process for all of JEA's water and wastewater
21 facilities. I am JEA's primary contact with
22 environmental and legislative bodies regarding all
23 aspects of electric, water and sewer permitting as
24 well as water quality and industrial pretreatment
25 issues.

1 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN
2 THESE DOCKETS?

3 A. The purpose of my rebuttal testimony is to address
4 certain issues raised by the prefiled direct
5 testimony of Caroline Silvers of the St. Johns
6 River Water Management District ("SJRWMD"), Edward
7 Cordova of the Florida Department of Environmental
8 Protection ("DEP"), and Dr. T. James Tofflemire of
9 the Duval County Health Department ("DCHD")
10 submitted on behalf of staff.

11 Q. HAVE YOU REVIEWED THE PREFILED TESTIMONY OF
12 CAROLINE SILVERS IN THESE DOCKETS?

13 A. Yes.

14 Q. ARE THERE ANY ISSUES IN MS. SILVERS' TESTIMONY
15 WHICH YOU WISH TO COMMENT UPON?

16 A. Yes. On page 4 of her testimony, Ms. Silvers
17 describes the water needs in the area designated as
18 Work Group V in the Water 20/20 planning process.
19 One of the advantages to JEA providing water
20 service to this area is the ability to utilize
21 JEA's interconnected grid system to meet the
22 growing demands in this area. JEA is in the process
23 of implementing its long term strategy to
24 interconnect its North and South Grids. There is
25 water resource capacity available in the North Grid

1 which, through interconnection, can be utilized to
2 supply water to the Work Group V area from outside
3 the water use caution region. Thus, JEA will be
4 able to further minimize the risk of environmental
5 problems in the South Grid area. When the
6 interconnection of the North and South Grids is
7 completed, a large regionalized system will be in
8 place which will put JEA in a unique position to
9 balance withdrawals from the Floridian Aquifer to
10 protect against adverse impacts.

11 **Q. DO YOU HAVE ANY COMMENTS REGARDING MS. SILVERS'**
12 **TESTIMONY REGARDING THE AVERAGE DAY DEMAND DEFICIT**
13 **FOR THE YEAR 2020 ACCURATE?**

14 **A.** Yes. On page 5 of her testimony, Ms. Silvers
15 refers to an average day demand deficit for JEA in
16 the year 2020. On page 6 of her testimony, Ms.
17 Silvers talks about potential options available to
18 JEA to address the situation. One of the options
19 that she mentions is an interconnect from the North
20 to the South Grid to convey new supply. As noted
21 above, JEA has begun implementing that option. The
22 interconnection of the North and South grids has
23 already been budgeted and the work is in the design
24 phase. When completed, the interconnection will
25 provide an additional 18 MGD of capacity to service

1 the needs in this area. In its most recent
2 consumptive use permit, JEA committed to have the
3 interconnection in service within 3 years. In
4 other words, the interconnection should be in place
5 by March 2003. Thus, the SJRWMD's calculation of
6 the average annual day deficit does not take into
7 account the improvements to JEA's system that are
8 in process.

9 Q. DO YOU HAVE ANY COMMENTS WITH RESPECT TO THE GROUND
10 WATER QUALITY CONCERNS IDENTIFIED BY MS. SILVERS?

11 A. Yes. JEA currently meets the water needs of its
12 customers through two separate interconnected grids
13 of large water plants. One such interconnected
14 grid ("the North Grid") is located north of the St.
15 Johns River in Duval County. The second
16 interconnected grid ("the South Grid") is located on
17 the south side of Duval County. JEA's
18 interconnected water plant configuration provides a
19 very high level of reliability and allows JEA to
20 balance withdrawals from the Floridian Aquifer in
21 order to minimize draw down and other adverse
22 impact. The interconnected grids also provide
23 background reliability in case of an outage in the
24 system. Because of the hydrogeology in the South
25 Grid area, some localized problems can arise as a

1 result of fracturing near withdrawals sites. These
2 localized problems can be dealt with through
3 planning, monitoring and modifications to existing
4 wellfields. JEA is in the process of installing a
5 wellfield optimization system which will utilize
6 wellhead instrumentation and computer modeling of
7 the aquifer to minimize impacts on aquifer levels
8 and water quality.

9 Q. ARE THERE ANY OTHER ASPECTS OF MS. SILVERS'
10 TESTIMONY THAT YOU WISH TO COMMENT UPON?

11 A. On page 7, line 19, Ms. Silvers discusses the
12 SJRWMD's goal of reducing discharges to certain
13 important water bodies. Under JEA's agreement with
14 Nocatee Utility Corporation, reuse to the Nocatee
15 development would come from JEA's Mandarin plant.
16 The increase in reuse from the Mandarin plant would
17 enable JEA to reduce its discharges to the St.
18 Johns River which is identified by Ms. Silvers as
19 one of the important goals of the water management
20 district.

21 Q. HAVE YOU READ THE PREFILED DIRECT TESTIMONY OF
22 EDWARD CORDOVA OF THE FLORIDA DEPARTMENT OF
23 ENVIRONMENTAL PROTECTION IN THESE DOCKETS?

24 A. Yes.

1 Q. DO YOU HAVE ANY COMMENTS WITH RESPECT TO THAT
2 TESTIMONY?

3 A. Yes. As discussed above, JEA's agreement with
4 Nocatee will enable JEA to further its reuse
5 program and reduce discharges to the St. Johns
6 River. This will help alleviate DEP's concerns
7 related to effluent disposal in the area.

8 Q. DO YOU HAVE ANY OTHER COMMENTS REGARDING MR.
9 CORDOVA'S TESTIMONY?

10 A. Yes. On page 3 of his testimony, Mr. Cordova
11 correctly notes the improvements made to JEA's
12 Mandarin plant as part of its recent expansion.
13 With respect to the Capacity Analysis Report
14 referenced on page 5, the Mandarin plant was
15 designed with the ability to expand to 15 MGD. Any
16 further expansions would incorporate the biological
17 nutrient reduction ("BNR") technology incorporated
18 in the last expansion. As noted in my direct
19 testimony, wastewater service to this area could
20 also potentially be provided through a connection
21 to JEA's Arlington East plant. The Arlington East
22 plant currently has a capacity of 15 MGD with an
23 average daily flow of 11 MGD. That plant is in the
24 process of expanding to 20 MGD.

1 Q. DID YOU ALSO REVIEW THE PREFILED DIRECT TESTIMONY
2 OF DR. T. JAMES TOFFLEMIRE?

3 A. Yes.

4 Q. DO YOU HAVE ANY COMMENTS WITH RESPECT TO HIS
5 TESTIMONY?

6 A. Yes. Dr. Tofflemire refers to problems encountered
7 during the drought in the summer of 1998. He notes
8 that some piping changes and new plant construction
9 have occurred since that time to provide more
10 pressure and flow to the Mandarin area and
11 Southside. What he fails to note is that those
12 corrective measures have proven to be quite
13 effective. We are currently in the midst of a
14 drought that is more extreme than the one he
15 referenced in the summer of 1998. Moreover, demand
16 has increased and pumping is approximately 20%
17 higher than it was in the summer of 1998.
18 Nevertheless, JEA has not suffered any water
19 pressure problems during the current drought.
20 Accordingly, it is clear that the corrective
21 measures implemented by JEA have worked.

22 Q. DO YOU HAVE ANY OTHER COMMENTS WITH RESPECT TO DR.
23 TOFFLEMIRE'S TESTIMONY?

24 A. Yes. Dr. Tofflemire makes several references to
25 the "limiting" grid capacity. His comments are

1 directed solely to JEA's South Grid. As previously
2 discussed, JEA is in the process of implementing
3 its plan to interconnect its North and South Grids.
4 Thus, JEA's ability to provide service to this area
5 even in the most extreme drought conditions will be
6 significantly enhanced.

7 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

8 A. Yes.