

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2

3 In re: Emergency Petition by) DOCKET NO. 981609-WS
 4 D.R. Horton Custom Homes, Inc.)
 5 to eliminate authority of)
 6 Southlake Utilities, Inc. to)
 7 collect service availability)
 8 charges and AFPI charges in Lake)
 9 County)
)

7 In re: Complaint by D.R. Horton)
 8 Custom Homes, Inc. against) DOCKET NO. 980992-WS
 9 Southlake Utilities, Inc. In)
 10 Lake County regarding collection)
 11 of certain AFPI charges.)
)

10

11 **REBUTTAL TESTIMONY**
 12 **OF**
 13 **JOHN F. GUASTELLA**
 14 **ON BEHALF OF SOUTHLAKE UTILITIES, INC.**

13

14 Q. Please state your name and address.

15 A. My name is John F. Guastella. My business address
 16 is 100 Boylston Street, Suite 800, Boston, MA 02116.

17 Q. By whom are you employed?

18 A. I am employed by Guastella Associates, Inc.
 19 ("Guastella Associates").

20 Q. What is your position with Guastella Associates?

21 A. I am President of Guastella Associates.

22 Q. Have you previously submitted prefiled direct
 23 testimony in this proceeding?

24 A. Yes.

25 Q. Have you reviewed the testimonies of Mr. James

DOCUMENT NUMBER-DATE
 04214 APR-55
 FPSC-RECORDS/REPORTING

1 C. Boyd and Mr. Michael E. Burton, submitted on
2 behalf of D. R. Horton Custom Homes, Inc.
3 ("Horton"), and the testimony of Mr. William Troy
4 Rendell, submitted on behalf of the Staff of the
5 Florida Public Service Commission ("FPSC")?

6 A. Yes.

7 Q. What is the purpose of your rebuttal testimony?

8 A. My rebuttal testimony addresses issues raised by
9 each witness, particularly in terms of whether those
10 issues have an impact on Southlake's service
11 availability charges or AFPI charges.

12 Q. With respect to Mr. Boyd's testimony, do you have
13 any general comments?

14 A. Yes. I was unable to find in Mr. Boyd's testimony
15 any opinion that directly addresses the economic or
16 rate setting principles regarding service
17 availability or AFPI charges or the specific
18 calculation of the charges, or the issue of refunds,
19 which are the ultimate issues in the dockets now
20 before the Commission. Instead, Mr. Boyd's effort
21 seems to have been to try to find anything that he
22 can claim is an "inconsistency". I will address each
23 of his comparisons and claimed inconsistencies.

24 Q. The first issue Mr. Boyd raised relates to the cost
25 estimates proposed by CPH Engineers, Inc., which he

1 discusses on pages 1 to 4 of his testimony. Please
2 respond.

3 A. After saying his first issue is the cost estimates,
4 Mr. Boyd then does not focus on or discuss any
5 disagreement with any specific cost in pages 1-4 of
6 his testimony. Instead, he discusses some of the
7 information in Exhibit JFG-7 ("CPH Report") related
8 to the demand for service, construction phases, and
9 capacities of certain components of the system. Mr.
10 Boyd erroneously derives a different capacity for
11 the water system and then claims that Southlake has
12 not tied the costs to the CPH Report to the plant
13 capacity used in the JFG Report. Mr. Boyd
14 erroneously assumed that high service pumps were the
15 limiting factor in the capacity of the water system
16 when in fact the wells are the limiting factor.

17 Q. Had Southlake advised Horton that the wells were the
18 limiting factor in the water system?

19 A. Yes. In a February 4, 2000, letter to Mr. Bart
20 Fletcher, of the FPSC Staff, a copy of which was
21 provided to Horton, Southlake responded to comments
22 in Mr. Boyd's January 3, 2000 letter. Mr. Boyd
23 repeated in his testimony many of his previous
24 comments from his letter. One such comment was
25 focused on a perceived difference between one of the

1 plant expansions in Southlake's schedules (2.448
2 mgd) and the FDEP permit (2.912 mgd) associated with
3 the expansion. As Southlake previously and
4 correctly stated:

5 [t]he expanded water treatment plant
6 will have an estimated capacity of
7 2.912 mgd. However, the initial
8 capacity of the water system is
9 limited by the rated flow of the
10 supply wells. The initial available
11 flow available from the supply wells
12 in 2000 is anticipated to be 1,700
13 gallons per minute. The formula is
14 1,700 current well flow gallons per
15 minute times 60 minutes per hour times
16 24 hours equals a capacity 2.448 mgd.
17 (Emphasis added).

18 Accordingly, Mr. Boyd's comment on page 4, lines 17-
19 19 that the capacity associated with the proposed
20 year 2001 expansion does not match the capacity
21 specified in the corresponding FDEP permit is
22 misleading and not relevant to the plant capacity
23 used for the service availability analysis.

24 Q. After ignoring the correct limiting factor, what was
25 Mr. Boyd's next step?

1 A. After choosing the wrong limiting factor, Mr. Boyd
2 then derives the wrong plant capacities. Mr. Boyd
3 then states that the capacities in Exhibit JFG-2
4 ("JFG Report") are less than his wrongly derived
5 capacities, and therefore, he argues that there is
6 an inconsistency between the maximum day demand of
7 14,180,063 GPD that he used and the 8,640,000 GPD
8 reflected in the JFG Report.

9 Q. Would you explain the difference?

10 A. The 8,640,000 GPD represents "firm capacity", the
11 basis of which has previously been explained by
12 Southlake in the February 4, 2000 letter to Mr.
13 Fletcher responding, in part, to Mr. Boyd's
14 assertions. As part of his assertions in the
15 letter, Mr. Boyd had chosen the wrong limiting
16 factor in his analysis in the letter and derived
17 incorrect capacities for the expansions. Mr. Boyd's
18 "derived phasing" does not appear in the CPH Report.
19 In fact it differs rather remarkably from the design
20 recommendations of the CPH Report. One difference
21 is that Mr. Boyd purposes a facilities design that
22 assumes no down time for maintenance and repair of
23 equipment, no equipment failures, and no drawn-down
24 rest time of wells. The recommendations of CPH
25 Engineers and R.H. Wilson use appropriate

1 conservative design practice. R.H. Wilson &
2 Associates, R.H. Wilson, P.E., recommended that
3 future plant expansion be based on "firm capacity"
4 rather than total capacity. Firm capacity of a
5 water plant is assumed to be the smaller of the
6 following:

- 7 1. Total well capacity with the largest well out of
8 service at each plant, or:
- 9 2. Total high service pump capacity with the
10 largest pump off-line.

11 Well capacity, rather than high service pump
12 capacity, was the limiting factor in Southlake's
13 forecasts through 2007, which I moved to 2008 on the
14 basis of more current information. By the end of
15 2008, Southlake envisions a total well count of 11.

16 Q. I show you a document labeled Exhibit JFG-10. Can
17 you identify it?

18 A. Yes. It is an exhibit showing the eleven wells and
19 their rated capacities.

20 Q. Please continue.

21 A. Because of concerns resulting from the proximity of
22 a petroleum storage facility adjacent to wells A1.1
23 and A1.2, Southlake envisions the possibility of
24 being required to deactivate those wells, leaving
25 nine active wells.

1 Southlake is also concerned about drawdown
2 constraints imposed by adjacent wetlands. Six of
3 the nine active wells will be adjacent to wetlands.
4 Each will draw from the upper Floridian Aquifer,
5 typically at depths of 300 to 400 ft. The wells
6 will have drawdown cone impact on the adjacent
7 wetlands. According to the recently released draft
8 of Water 2020, Work Group Area I: East-Central
9 Florida Conceptual Water Supply Plan by St. Johns
10 River Water Management District and CH2M Hill, p. 21
11 "Each type of wetland has an associated maximum
12 drawdown limit beyond which unacceptable harm is
13 expected to occur". The report's model limits
14 surficial drawdown to between 0.35 and 0.85 feet,
15 depending on the type of wetland. For this reason
16 Southlake's planning envisions phasing in a plan for
17 alternation of wells with alternating 30 day rest
18 periods, i.e., 30 days on, 30 days off beginning
19 with Phase 4. When a well is off-line at rest it is
20 not counted as part of plant capacity.

21 Q. I show you a document labeled Exhibit JFG-11 . Can
22 you identify it?

23 A. Yes. Exhibit JFG-11 is a table summarizing source
24 of supply projected utilization by phase through
25 year 2008. The CPH Report firm capacity

1 recommendations affect available capacity beginning
2 in 2001 when two wells at WTP-B become available.
3 The wetlands drawdown protection protocol begins
4 with Phase 4.

5 Q. Please continue.

6 A. In summary, the well capacity (not high service
7 pumping capacity) is considered the limiting factor.
8 The total well capacity was adjusted to allow for
9 the highest capacity well to be out of service at
10 one plant, to deactivate two wells because of
11 potential contamination, and to alternate the use of
12 certain other wells in order to limit potential
13 drawdown of adjacent wetlands.

14 Q. Why do you find it reasonable to use the 8,640,000
15 GPD capacity?

16 A. Using ERA's growth projection, we determined that
17 the maximum day demand would be some 7,849,800 GPD,
18 which is reasonably within the 8,640,000 GPD firm
19 capacity of the wells. The facilities recommended by
20 CPH as to capacity and cost are all needed to
21 achieve the 8,640,000 GPD of firm capacity for
22 source of supply and have sufficient high service
23 pumping and storage capacity to meet peak hour and
24 fire demand. The high service pumps and storage,
25 which must be capable of meeting peak hour and fire

1 demands in terms of rate of flow, as well as
2 quantity, were also found to be adequate.
3 Accordingly, I found that Southlake has taken
4 necessary steps to reliably meet the potential water
5 demands of its customers, and they are consistent
6 with reasonable growth projections.

7 Q. Is there a difference between the timing of the CPH
8 phases and the timing of the phases in the JFG
9 Report?

10 A. Yes. We have included the CPH costs according to the
11 growth projection by ERA. I would note that because
12 we are dealing with both short and long term
13 projections, it would be unreasonable to expect year-
14 by-year precision as to growth or cost. However,
15 that kind of precision is not necessary in the
16 establishment of plant capacity charges and AFPI
17 charges.

18 Q. Please respond to Mr. Boyd's opinion that the plant
19 expansion costs contained in Exhibit JFG-2 do not
20 accurately reflect the basis for such costs, which is
21 the CPH Report, because the costs and associated
22 capacities do not match.

23 A. Mr. Boyd is wrong. As I explained above, the
24 8,640,000 GPD is the firm capacity needed to meet
25 the maximum day demands anticipated for the ERA

1 growth projections that we use. The total
2 capacities and related costs in the CPH report are
3 necessary to achieve the firm capacity. Mr. Boyd
4 has not provided a sufficient basis for any revision
5 to the connection fee analysis, which includes the
6 AFPI charge analysis, with respect to the projected
7 cost of the water system.

8 Q. The next item Mr. Boyd addresses pertains to the
9 date when the properties (land) were first devoted
10 to public service. Do you agree with Mr. Boyd's
11 analysis of this issue?

12 A. No. Mr. Boyd's recital of regulatory applications,
13 permits and assorted correspondence does not provide
14 a basis with which to establish when the land in
15 question was devoted to public service. It appears
16 that Mr. Boyd would penalize Southlake for
17 concurrently proceeding with investor owned and
18 municipal options which was necessary so that when
19 one option was selected it could be implemented as
20 soon as possible. Mr. Boyd did not have to assume
21 anything about Southlake's "legal ownership
22 authority" because Mr. Chapman clearly describes the
23 initial lease option and sequence of events that
24 establishes 1993 as the time when the lease was
25 executed. It was at that time when Southlake was

1 established as the utility that would serve the area
2 and use its own facilities. Mr. Boyd's failure to
3 even discuss the actual sequence of events has left
4 him with an irrelevant recital of documents that
5 misses the point.

6 Q. The next item Mr. Boyd addresses is the basis for
7 the wastewater plant capacity. Would you describe
8 your understanding of Mr. Boyd's position on this
9 item?

10 A. Mr. Boyd apparently recognizes that the FDEP
11 requirement for wastewater treatment capacity is 300
12 GPD per ERC, but that in some instances lower actual
13 demands on existing facilities might be considered
14 by the FDEP in evaluating the available capacity of
15 existing facilities. The potential for considering
16 the available capacity of the existing facilities at
17 lower actual demand, if justified by the utility and
18 accepted by the FDEP, does not change the need to
19 design for projected demand at 300 GPD. However,
20 according to Mr. Boyd, the potential creates an
21 opportunity for Southlake to adjust its projected
22 capacity.

23 Q. Should such potential be relied upon in establishing
24 connection charges?
25

1 A. Even if I agree with that potential, I don't agree
2 that connection fees should be based on a reliance
3 on that potential. There will always be some level
4 of "excess" capacity that will exist after full
5 development. There is no realistic way to assess the
6 extent of future capacity allowance by FDEP and the
7 actual cost differential related to incremental
8 changes in capacity. And, there is no allowance for
9 future environmental requirements that may increase
10 costs. It is, therefore, in the best interests of
11 the customers, in terms of future rates, to use
12 projected costs that were consistent with standard
13 design criteria. Otherwise, third party developers,
14 such as Horton, would receive the benefit of
15 potential reductions that may not materialize, but
16 incur no cost or risk if they do not materialize or
17 if there are other off setting cost increases. Thus,
18 under Mr. Boyd's analysis, the risk is shifted from
19 the developers to the ratepayers.

20 Q. Do you agree with Mr. Boyd's discussion of reclaimed
21 water?

22 A. No, Mr. Boyd states that Southlake has not committed
23 to a "full-scale" program. To the contrary, he
24 identifies a special condition by the St. Johns
25 River Water Management District ("SJRWMD") staff

1 indicating that reclaimed water must be used
2 whenever an irrigation demand exists and such reuse
3 is feasible. In fact, color coded pipe has been
4 installed at Cagan's Crossing, Sarah's Place, Nelson
5 Park and Summer Bay in anticipation of reuse water
6 for irrigation. Some of these developments now
7 irrigate with sources other than from Southlake.
8 Mr. Boyd claims that Southlake's intent to provide
9 reclaimed waters is inconsistent with its permitting
10 history. However, Mr. Boyd acknowledges that
11 Southlake's position reported to the SJRWMD is that:

12 [t]he utility currently plans to
13 increase the level of treatment for
14 the wastewater treatment plant within
15 the next three years. The net result
16 will be that reclaimed water will be
17 available for those projects where it
18 is economically feasible to provide
19 the transmission facilities.

20 Southlake's plans to upgrade its facilities to reach
21 a level of treatment needed to provide reclaimed
22 water is consistent with the costs in the JFG
23 Report. Southlake is preparing to increase its
24 level of treatment to a reuse level of treatment and
25 some developments have been required to install

1 reuse lines. Thus, Mr. Boyd is trying to create
2 controversy where none exists. SJRWMD is seeking
3 reuse and Southlake is seeking to provide it.
4 Horton is apparently seeking to avoid paying for its
5 share of the capital costs. With respect to Mr.
6 Boyd's questions as to what percentage of the
7 wastewater treatment plant capacity will be needed
8 for reclaimed water supply, it seems likely that the
9 whole plant capacity will be needed because
10 irrigation needs are anticipated to exceed the
11 maximum reclaimed water which can be supplied by the
12 plant. Mr. Boyd's questions about reclaimed water
13 rates are irrelevant because there would be no
14 duplication of connection fees and the usage rates
15 should merely reflect an allocation of costs,
16 without an impact on current connection fees. In
17 sum, Mr. Boyd's comments on reuse are a non-issue.

18 Q. Would the use of reclaimed water for irrigation have
19 an impact on water use?

20 A. Yes. I certainly expect that the total amount of
21 water for irrigation would be reduced in terms of
22 total quantity. However, the impact on the maximum
23 day may not vary as significantly because the
24 reclaimed water may not have as great an impact on
25 maximum day demand. I would not recommend

1 eliminating the capacity of the source of supply or
2 any other component of the water system in
3 anticipation of significant reductions.

4 Q. Please respond to Mr. Boyd's conclusions on page 12,
5 lines 4-12.

6 A. As I said, SJRWMD is requiring reuse facilities and
7 Southlake is complying. Mr. Boyd's skeptical review
8 of permit history does not change reality. The
9 SJRWMD and FPSC are well aware of the need for
10 capital investment in providing reuse facilities.
11 If Mr. Boyd wants assurances (that are not required
12 by the FPSC), I can say with a reasonable degree of
13 certainty that the FPSC will assuredly determine the
14 level of capacity charges and reuse water rates that
15 are necessary to cover the costs. By raising a
16 doubt about the reuse program, Mr. Boyd is again
17 trying to shift the risk from Horton to Southlake
18 and its customers. Southlake should not be denied
19 the opportunity to plan for reuse by disallowing
20 costs that are essential in order to comply with the
21 SJRWMD and the FPSC consummation goals.

22 Q. The last of Mr. Boyd's issues relates to growth. Do
23 you agree with his analysis?

24 A. No. Mr. Boyd raises two basic objections. He first
25 objects to the inclusion of the 313 units in the

1 eliminating the capacity of the source of supply or
2 any other component of the water system in
3 anticipation of significant reductions.

4 Q. Please respond to Mr. Boyd's conclusions on page 12,
5 lines 4-12.

6 A. As I said, SJRWMD is requiring reuse facilities and
7 Southlake is complying. Mr. Boyd's skeptical review
8 of permit history does not change reality. The
9 SJRWMD and FPSC are well aware of the need for
10 capital investment in providing reuse facilities.
11 If Mr. Boyd wants assurances (that are not required
12 by the FPSC), I can say with a reasonable degree of
13 certainty that the FPSC will assuredly determine the
14 level of capacity charges and reuse water rates that
15 are necessary to cover the costs. By raising a
16 doubt about the reuse program, Mr. Boyd is again
17 trying to shift the risk from Horton to Southlake
18 and its customers. Southlake should not be denied
19 the opportunity to plan for reuse by disallowing
20 costs that are essential in order to comply with the
21 SJRWMD and the FPSC consummation goals.

22 Q. The last of Mr. Boyd's issues relates to growth. Do
23 you agree with his analysis?

24 A. No. Mr. Boyd raises two basic objections. He first
25 objects to the inclusion of the 313 units in the

1 Raintree Apartments. He also concludes that Mr.
2 Patrick L. Phillips of ERA was in error in
3 estimating that there would be 430 permitted units
4 in 2000. Mr. Boyd is incorrect with respect to both
5 items.

6 Q. Would you please address the 313 units in the
7 Raintree Apartments?

8 A. Yes, I prepared a schedule showing, by size meter
9 and development, the connections and related units
10 for 1999 and 2000. The number of meters shown
11 reflects actual meters installed for each year. The
12 number of residential units reflect the dwelling
13 units that will be served by each meter. This
14 schedule contains information through year end 2000.
15 The similar schedule which was previously submitted
16 in mid December 2000 in response to a Staff
17 interrogatory did not contain year-end data because
18 it was not available at that time. With respect to
19 Raintree, there is a note in the answer to
20 interrogatory that identifies this project as "under
21 construction." Mr. Boyd uses this reference to
22 conclude that because the 794 units of growth in
23 2000 include the 313 Raintree units, perhaps these
24 313 units should not be counted in year 2000. I
25 would like to make three points in connection with

1 Mr. Boyd's suggestion. First, connections for
2 Raintree to Southlake's utility system occurred in
3 2000 not 2001, as evidenced by the 27 meters set in
4 2000. The time of connection is very important for
5 service availability analysis under Commission
6 precedents. In 2000, Southlake has a customer who
7 is paying base facility charges and who can demand
8 313 ERCs of service. Including Raintree in 2000 is
9 consistent with an analysis based upon the time of
10 connection. Second, whether the 313 units are
11 counted in 2000 or 2001, they will be counted as
12 growth in Southlake's service area. Mr. Boyd would
13 increase growth in 2001 at the same time he would
14 reduce it in 2000. Eventually, whether 2000 or
15 later, plant capacity will be needed for the 313
16 units. While the flows might not start until after
17 2000, the capacity has to be built sooner than the
18 flows. Mr. Boyd's delaying tactics are irrelevant
19 arguments, especially when you consider the third
20 point - the fact is that the 313 Raintree units were
21 not counted for 2000 in my Connection Fee Analysis;
22 Schedule C.1 used growth of only 419 units for 2000
23 which is less than the 794 units of actual growth.

24 Q. I show you a document labeled Exhibit JFG - 12. Can
25 you identify it?

1 A. Yes, it is the year end schedule of connections and
2 related units I mentioned above.

3 Q. How is Mr. Boyd in error with respect to ERA's
4 estimates of permits?

5 A. The ERA data reflect permits related to "units" not
6 "buildings". Mr. Boyd's determination of permits is
7 for buildings, and he does not make the necessary
8 adjustment for buildings with multiple family units.
9 If he did, his figure would be close to ERA's
10 figure.

11 Q. What is your overall conclusion with regard to Mr.
12 Boyd's testimony?

13 A. Mr. Boyd's claims of "inconsistencies" are either
14 erroneous or not relevant to connection fees. He has
15 presented no basis upon which to adjust the cost or
16 growth projections I included in my Connection Fee
17 Analysis.

18 Q. With respect to Mr. Burton's testimony, do you agree
19 with his position with respect to land?

20 A. No. Mr. Burton's suggestion that the value of the
21 land be established at the original cost to the
22 related party is unreasonable and inconsistent with
23 the FPSC's, May 9, 2000 Order No. PSC-00-0917-SC-WS.
24 Despite its status as a utility, Southlake does not
25 have any obligation or right to lease or acquire

1 property from anyone, including related parties, at
2 less than market value.

3 The FPSC has recognized this principle, and Mr.
4 Burton's suggestion to the contrary is confiscatory
5 in nature. I have previously testified as to the
6 time when the land should be considered devoted to
7 public use. The fact is that market value for
8 utility property is, like any other market value
9 determination, at its highest and best use.

10 Q. With respect to Mr. Rendell's testimony, do you have
11 any comments regarding his interpretation of
12 Southlake's tariff regarding service availability
13 charges to residential customers?

14 A. Yes. Mr. Rendell proposes to revise Southlake's
15 current water and wastewater tariff, Sheet Nos 31.0
16 and 28.0, respectively. The revision would make
17 those tariff provisions only applicable to a "non-
18 residential" contributor. I do not have any
19 objection to this part of Mr. Rendell's proposed
20 revision if it reflects the FPSC's preference. It is
21 clear, however, that the necessity of this proposed
22 revision is because the plant capacity charges to
23 residential customers are now subject to upward
24 adjustment under the existing tariff if their
25

1 consumption exceeds the 350 gpd and 300 gpd design
2 criteria for water and wastewater, respectively.

3 I do not agree with the other revision to the same
4 tariff provision proposed by Mr. Rendell.
5 Specifically, the provision would allow for a pro
6 rata refund if actual consumption after 12 months is
7 less than the gallonage basis for the plant capacity
8 charge. This revision would be improper. The plant
9 capacity and cost are designed to meet the design
10 capacity criteria per ERC. Thus, each ERC pays a
11 plant capacity charge for plant that exists to meet
12 that potential design demand, whether or not the
13 actual demand is lower. On the other hand, exceeding
14 the designed capacity requires additional plant and
15 cost, and an additional charge is appropriate.

16 Q. Does this conclude your rebuttal testimony?

17 A. Yes. However, I will be glad to answer any
18 questions that anyone would like to ask.

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DOCKET NOS. 980922-WS AND 981609-WS
EXHIBIT NO. JFG-10
J. GUASTELL EXHIBIT NO. _____
RATED CAPACITIES OF THE WELLS

RATED CAPACITIES OF THE WELLS

Well A1.1	500 gpm	.720 mgd	Phase 1	Plant A
Well A1.2	1,200 gpm	1.728 mgd	Phase 1	Plant A
Well A1.3	1,200 gpm	1.728 mgd	Phase 1	Plant A
Well B2.1	1,200 gpm	1.728 mgd	Phase 2	Plant B
Well B2.2	1,200 gpm	1.728 mgd	Phase 2	Plant B
Well A3.1	1,200 gpm	1.728 mgd	Phase 3	Plant A
Well B3.1	1,200 gpm	1.728 mgd	Phase 3	Plant B
Well B3.2	1,200 gpm	1.728 mgd	Phase 3	Plant B
Well B4.1	1,200 gpm	1.728 mgd	Phase 4	Plant B
Well B4.2	1,200 gpm	1.728 mgd	Phase 4	Plant B
Well B5.1	1,200 gpm	1.728 mgd	Phase 5	Plant B

SOUTHLAKE UTILITIES, INC.
Source of Supply Projected Utilization-2001

	WTP	Wells	Rated gpm	Operation	Actual Capacity(mgd)	
Phase I 2001	A	B	A1.1	500	full time	0.720
	A	D	A1.2	1200	full time	1.728
	A	A	A1.3	1200	full time	1.728
						4.176
	Largest Well Out of Service Max Day Capacity					(1.728) 2.448
Phase II 2002	A	B	A1.1	500	standby	0.000
	A	D	A1.2	1200	full time	1.728
	A	A	A1.3	1200	1 out of serv	0.000
	A	E		1200	not avail.	0.000
	B	1	B2.1	1200	alternate	0.864
	B	2	B2.2	1200	alternate	0.864
	Max Day Capacity					3.456
Phase III 2005	A	B	A1.1	1200	standby	0.000
	A	D	A1.2	1200	standby	0.000
	A	A	A1.3	1200	full time	1.728
	A	E		1200	not avail.	0.000
	A	F	A3.1	1200	1 out of serv	0.000
	B	1	B2.1	1200	alternate	0.864
	B	2	B2.2	1200	alternate	0.864
	B	3	B3.1	1200	alternate	0.864
	B	4	B3.2	1200	alternate	0.864
	Max Day Capacity					5.184
Phase IV 2007	A	B	A1.1	1200	standby	0.000
	A	D	A1.2	1200	standby	0.000
	A	A	A1.3	1200	full time	1.728
	A	E		1200	not avail.	0.000
	A	F	A3.1	1200	1 out of serv	0.000
	B	1	B2.1	1200	alternate	0.864
	B	2	B2.2	1200	alternate	0.864
	B	3	B3.1	1200	alternate	0.864
	B	4	B3.2	1200	alternate	0.864
	B	5	B4.1	1200	alternate	0.864
	B	6	B4.2	1200	alternate	0.864
	Max Day Capacity					6.912
Phase V 2008	A	B	A1.1	1200	standby	0.000
	A	D	A1.2	1200	standby	0.000
	A	A	A1.3	1200	full time	1.728
	A	E		1200	not avail.	0.000
	A	F	A3.1	1200	1 out of serv	0.000
	B	1	B2.1	1200	alternate	0.864
	B	2	B2.2	1200	alternate	0.864
	B	3	B3.1	1200	alternate	0.864
	B	4	B3.2	1200	alternate	0.864
	B	5	B4.1	1200	alternate	0.864
	B	6	B4.2	1200	alternate	0.864
	B	7	B5.1	1200	full time	1.728
Max Day Capacity					8.640	

Note that the wells marked as having “alternate” operation/utilization are used only $\frac{1}{2}$ of the time and therefore their effective or actual capacity would be $1200 \text{ GPM} \times 1440 = 1.728 \text{ MGD} \div 2 = .864 \text{ MGD}$.

Southlake Utilities, Inc.

		12/31/99			12/31/00		
		YE Units	Meters	ERCs	YE Units	Meters	ERCs
5/8 x 3/4" Meter -							
Sgl family houses		392	392	392.000	514	514	514.000
Sgl family Timeshares		14	14	14.000	17	17	17.000
Multifamily	Cagan Crossing / Ridgepointe	272 *	1 *	8.571 *	294	294	210.000
Commercial / Gen Serv	Ridgepointe Club Hse	0	0	0.000	1	1	0.714
	Ridgepointe Outside Hose	0	0	0.000	0	15	15.000
	Macchi	1	1	1.143	1	1	1.143
	Publix	7	7	12.000	8	8	13.714
	Winn-Dixie	7	7	6.686	7	7	6.686
	Southlake Car Wash	1	1	8.571	1	1	8.571
	SB Guard Hse	1	1	1.000	1	1	1.000
	SB Trailer	1	1	1.000	0	0	0.000
Note(*) - Under Construction							
1" Meter -							
Multifamily	Southlake Apts	362	44	125.714	362	44	125.714
Commercial / Gen Serv	Handy Way	1	1	7.857	1	1	7.857
	Stratford Pool	1	1	1.714	1	1	1.714
	SB Admin Bldg	1	1	1.646	1	1	1.646
	Spur Gas	1	1	2.500	1	1	2.500
	Speedway Gas	1	1	5.029	1	1	5.029
	Ridgeland Church	1	1	2.857	1	1	2.857
1 1/2" Meter -							
Multifamily	Southlake Apts	72	8	45.714	72	8	45.714
Commercial / Gen Serv	SB Welcome Ctr	0	0	0.000	1	1	5.714
	Randy's Restaurant	0	0	0.000	1	1	4.000
	SB Club Hse	1	1	3.000	1	1	3.000
2" Meter -							
Multifamily	Raintree Apts	0	0	0.000	313 *	27 *	223.571 *
Commercial / Gen Serv	Summer Bay	353	14	159.200	353	14	159.200
	Publix	1	1	22.286	1	1	22.286
	Winn-Dixie	1	1	15.714	1	1	15.714
	Denny's Restaurant	0	0	0.000	1 *	1 *	8.000 *
	SB Irrig	0	0	0.000	1	1	8.000
	Raintree Clubhse	0	0	0.000	1	1	8.000
	Aurora Pool	0	0	0.000	1	1	8.000
	Ridgepointe Pool	0	0	0.000	1	1	8.000
	Southlake Irrig	1	1	8.571	1	1	8.000
	Clear Crk Irrig	1	1	8.000	1	1	8.000
Note(*) - Construction in Progress, Meters Set							
4" Meter -							
Commercial / Gen Serv	SB Maint Bldg	1	1	26.000	1	1	26.000
6" Meter -							
Multifamily	Nelson Park	0	0	0.000	326	1	260.800
	Sarah's Place	330	2	247.176	330	2	247.176
TOTALS		1,825	505	1,127.950	2,619	974	2,004.322

DOCKET NOS. 980922-WS AND 981609-WS
 EXHIBIT NO. JFG-12
 J. GASTELIA EXHIBIT NO.
 CHART OF CONNECTIONS AND UNITS - YEAR END