

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation of the Quality)
of Service Provided by Florida)
Water Services, Inc. to the)
Deltona Service Territory)

Docket No. 010153-WU

Filed: May 18, 2001

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FLORIDA PUBLIC
SERVICE COMMISSION

MOTION TO INTERVENE

Rosemarie Hester ("Hester"), by and through her undersigned counsel, files this Motion to Intervene in the above styled proceeding, and in support thereof Hester would state:

1. The proceeding initiated by the Citizens of the State of Florida is based in part upon the issues raised by Hester concerning the quality of service provided to her homestead property by Florida Water Services.

2. Hester resides at 2413 Alamanda Avenue, Deltona, Florida 32738, which is within the service territory of Florida Water Services designated as the Deltona Service Territory. She is an interested party in the proceedings whose interests will be affected by these proceedings.

3. Florida Water Services has filed a general response which alleges that Florida Water Services has accused Hester of attempting to get her neighbors to plant blood worms at their residences. This tactic is designed to deter efforts to determine the source of the problems experienced by Hester and other consumers. Such allegations by Florida Water Services have been made with a reckless disregard of the truth and are without merit. The allegations are consistent with other forms of harassment experienced by Hester at the hands of Florida Water's employees since this issue

PP
MP
COM
DIR
CR
EG
DPC
PAI
RGO
REC
ER

Hester

DOCUMENT NUMBER-DATE

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FLORIDA PUBLIC SERVICE COMMISSION CLERK

surfaced in the fall of 2000.

4. Hester has at all times truthfully reported the presence of blood worms at her homestead property in Deltona, and has attempted to cooperate with Florida Water and other affected parties in trying to determine the cause of the contamination. Hester has continued to attempt to achieve a dialogue with Florida Water Services and other affected parties to bring this matter to an amicable and productive resolution to prevent future occurrences of blood worms showing up in the drinking water of consumers in the Deltona Service Territory.

Based upon the foregoing, Hester should be allowed to intervene in these proceedings as she has a clear and direct interest in the matter involved and a direct stake in the outcome of any negotiated or litigated resolution.

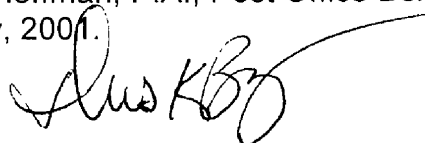
Respectfully submitted,



Dennis K. Bayer, Esquire
Attorney for Rosemarie Hester
Florida Bar No. 0512737
306 South Oceanshore Boulevard
Flagler Beach, FL 32136
Telephone: (386) 439-2332
Fax: (386) 439-6522

DOCKET NO. 010153-WU
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by facsimile transmission and U.S. Mail delivery to Jack Shreve, Public Counsel and Stephen C. Reilly, Associate Public Counsel, Attorneys for the Citizens of the State of Florida, Office of Public Counsel, % The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, FL 32399-1400; Jennifer Brubaker, Esquire, Division of Legal Services, Fla. Public Service Commission, 2540 Shumard Oak Blvd., Room 370, Tallahassee, FL 32399-0850; Kenneth A. Hoffman, Esquire and Martin P. McDonnell, Esquire, Rutledge, Ecenia, Purnell & Hoffman, P.A., Post Office Box 551, Tallahassee, FL 32302 this 23rd day of July, 2001.



July 23, 2001



FPL
Mr. Leu Hay
President & C.E.O.
700 Universe Blvd.
Juno Beach, FL. 33408

Ref: The Romanian Church of God
1811 Arthur Street
Hollywood, FL

Dear Mr. Hay,

Enclosed is a copy of my letter which has been sent to the Public Service Commission and your Hollywood branch office.

I would have brought this issue to you if it weren't for the lack of consideration and respect I received from your people. I was informed this is not the first time this issue has occurred; maybe FPL needs to change its policy.

Sincerely,

Robert F. Formica P.E.,

July 23, 2001



FPL

Mr. Leu Hay
President & C.E.O.
700 Universe Blvd.
Juno Beach, FL. 33408

Ref: The Romanian Church of God
1811 Arthur Street
Hollywood, FL

Dear Mr. Hay,

As the engineer of record for the above project, I have come to an impasse with Florida Power & Light Company over the electrical meter to be provided for this project.

Due to FPL's inability to provide a three phase wye power connection for the above church, as I originally designed. I had to change the electrical service to a three phase open delta connection. This new design caused one of my phrases to exceed the continuous rating of the meter FPL wants to supply.

When I expressed my concerns with Customer Project Manager, Ms. Gale Deleonardis my FPL representative for this project she stated that no other meter would be provided and that this is company policy. Upon researching this issue in FPL's Electric Service Standards, I found this is generally the case; not absolutely the case. When I escalated my request to Senior Supervisor & Project Manager, Mr. Dan Contento, not only did I get the same response, but I was told that if the meter burned out FPL would replace it. I was also informed that if I really wanted the metering system designed, it would cost me about \$400.00 out of pocket.

As a professional engineer in the state of Florida the statute which governs my license clearly states my responsibility is to safe guard the public in all my designs. Putting an electrical meter in that has the possibility of over heating or burning out would not only ignore this state statute but be very poor engineering judgment.

I do not intend to subject my client to a possible power failure especially when their are a great number of men, women and children. It's my hope that this matter can be resolved quickly without holding up the completion of their project.

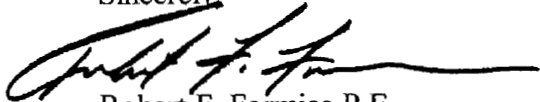
1616 N.W. 2nd Avenue • Boca Raton, FL 33432
561.368.3611 • Fax 561.368.4733

I have enclosed the following:

1. Personal Qualifications
2. Electrical Service Riser
3. Main Power Schedule
4. F.P.L.
5. Meter Specification

If you have any questions please call me.

Sincerely

A handwritten signature in black ink, appearing to read "Robert F. Formica", with a long horizontal flourish extending to the right.

Robert F. Formica P.E.,

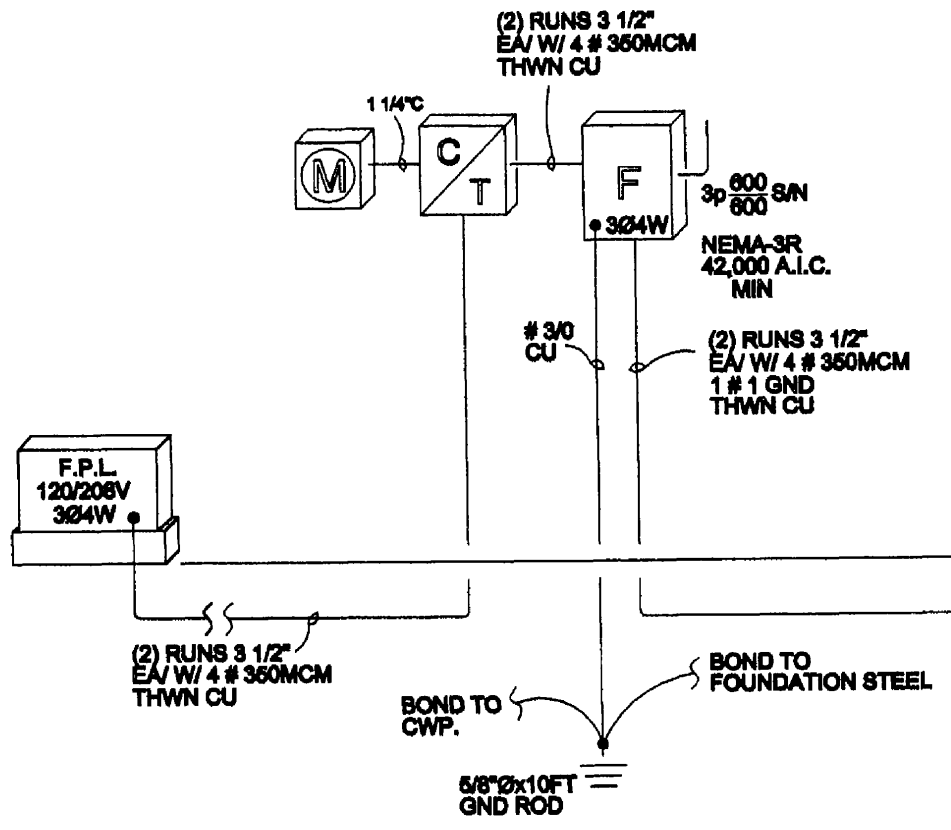
cc:

Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL. 32399

Mailie Shariff, Service Planning Supervisor
4000 Davie Road Ext.
Hollywood, FL. 33024

Educational Background of Robert F. Formica P.E.,

Robert F. Formica P.E., graduated from the University of Miami in 1968 with a degree in electrical engineering. He has been a consulting engineer in the State of Florida for over twenty years. He has designed over 2000 projects in his career. He holds licenses in the states of Florida, Virginia and Connecticut.



MFG. SIEMENS
 VOLTS 120/240V 3Ø4W (OPEN DELTA)

TYPE S1
 PANEL MDP

PANEL RATING 600 AMPS
 POS 42

BUS KVA			LOAD	COND.	WIRE SIZE	POLE	AMPS	GKT.	BUS	GKT.	AMPS	POLE	WIRE SIZE	COND.	LOAD	BUS KVA		
A	B	C														A	B	C
6.25			CU-1 *	1 1/2"	1	3	125	1	+	2	125	3	1	1 1/2"	CU-2 *	6.25		
	6.25		"	8	8	8	8	3	+	4	8	8	8	8	"		6.25	
		6.25	"	8	8	8	8	5	+	6	8	8	8	8	"			6.25
6.65			AHU-1 *	1"	4	3	70	7	+	8	70	3	4	1"	AHU-2 *	6.65		
	6.65		"	8	8	8	8	9	+	10	8	8	8	8	"		6.65	
		6.65	"	8	8	8	8	11	+	12	8	8	8	8	"			6.65
5.0			CU-3 *	1 1/4"	3	3	100	13	+	14	100	3	3	1 1/4"	CU-4 *	5.0		
	5.0		"	8	8	8	8	15	+	16	8	8	8	8	"		5.0	
		5.0	"	8	8	8	8	17	+	18	8	8	8	8	"			5.0
5.0			AHU-3 *	1"	6	3	60	19	+	20	60	3	6	1"	AHU-4 *	5.0		
	5.0		"	8	8	8	8	21	+	22	8	8	8	8	"		5.0	
		5.0	"	8	8	8	8	23	+	24	8	8	8	8	"			5.0
17.4			PANEL "A"	2"	3/0	2	200	25	+	26	200	2	3/0	2"	PANEL "B"	15.2		
			SPACE	-	-	-	-	27	+	28	-	-	-	-	SPACE			
		13.2	PANEL "A"	8	8	8	8	29	+	30	8	8	8	8	PANEL "B"			13.6
6.0			PANEL "H"	1 1/4"	3	2	100	31	+	32	-	-	-	-	SPACE	-		
			SPACE	-	-	-	-	33	+	34	-	-	-	-	"	-		
		4.2	PANEL "H"	8	8	8	8	35	+	36	-	-	-	-	"	-		
			SPACE	-	-	-	-	37	+	38	-	-	-	-	"	-		
			"	-	-	-	-	39	+	40	-	-	-	-	"	-		
			"	-	-	-	-	41	+	42	-	-	-	-	"	-		

KVA OA 62 KVA OB 23.3 KVA OC 64.3

Ia 516 AMPS Ib 194 AMPS Ic 462 AMPS

(2) RUNS THWN
 FEEDER SIZE 4 # 500 MCM CU CONDUIT SIZE (2) 3 1/2" C

REMARKS

1. MAIN LUGS ONLY
 2. NON CONCURRENT LOADS - ALL A/C BREAKERS TO BE "HACR" RATED.
 3. PHASE "B" IS HIGH LEG COLOR WHITE AND TERMINAL ORANGE
- MOUNT SURFACE MIN. A.I.C. 22,000 AMPS



Electric Service Standards

DATE
7-9-99

PREPARED BY
Distribution Construction
Processes

SUBJECT
VI. METERING EQUIPMENT

SECTION: PAGE
VI - 1 of 11

VI. METERING EQUIPMENT

A. Equipment Furnished and Installed by FPL

FPL provides and installs, at its expense, adequate metering instruments to measure the electric service used by the Customer. Usually, only one watt-hour meter per Customer is needed. However, FPL will furnish whatever metering, in its opinion, is required.

Instrument transformers are provided and installed by FPL when the voltage or current exceeds the rating of FPL's standard self-contained meter. Generally, current transformers will be used if the demand current is 600 amperes or greater or if the voltage to ground is greater than 277 volts. Potential transformers will be used when the voltage to ground exceeds 277 volts. Close coordination between the Customer and FPL is required to ensure these instrument transformers are installed at the most appropriate time.

B. Equipment Furnished, Installed, and Owned by the Customer

All self-contained meter sockets are to be provided and installed by the Customer.

For commercial, self-contained metering, FPL requires meter sockets with manual by-pass capability to eliminate service interruptions on meter changes.

All Instrument Transformer (IT) rated metering equipment enclosures are to be provided and installed by the Customer. These include IT rated meter sockets, wall mounted and weatherhead IT cabinets, padmounted primary metering cabinets, and miscellaneous junction boxes/utility cabinets (Fig. VI-2 thru VI-7).

In some cases, the Customer might prefer prefabricated, combination socket and disconnect assemblies for multiple occupancy buildings (e.g. apartment or condominium buildings, shopping centers, etc.) as shown in Fig. IV-12b, or pedestal mounted equipment for mobile home parks as shown in Fig. IV-13b. Such equipment for all three phase and nonresidential installations must contain manual by-pass, jaw tension/release socket blocks. It shall be the Customer's responsibility to obtain authorization from FPL to use this equipment for a particular installation before committing to its use. FPL maintains an approved list of equipment. Information and specifications on any such special meter equipment not on FPL's approved list shall be submitted to FPL for approval before installation.

C. Metering Configurations & Approved Equipment

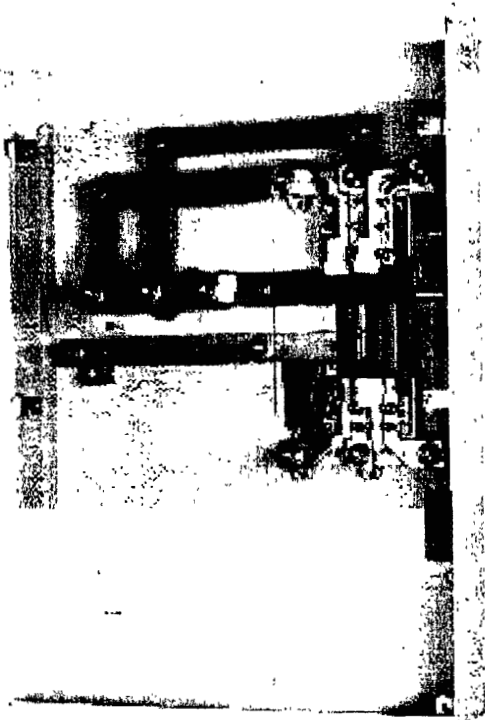
FPL specifies the metering configuration (See Fig. VI-1) for each service to be metered. FPL also requires that previously approved enclosures be used for each installation. The Customer is responsible for ensuring he is using the correct and approved enclosures. Failure to do so may result in delay of service and additional expense. The list of approved enclosures (current at the time of this publication) is provided in Chapter VII. If necessary, the most current list of approved enclosures can be obtained from your local FPL representative.

480A Continuous/600A Max. Meter Mounting Equipment

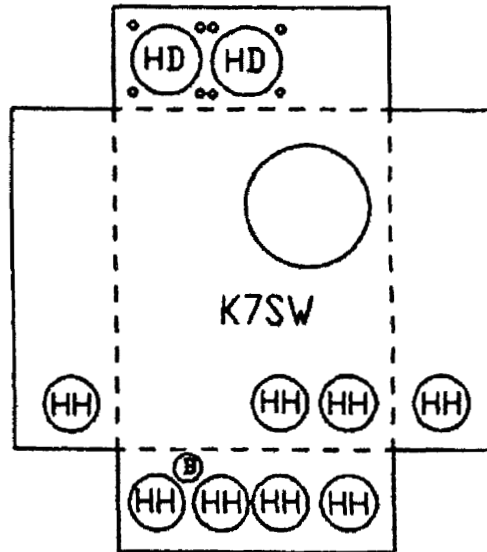
7 Terminal

3 Phase, 4 Wire, Wye or Delta

Type K-7 Residential/Commercial/Industrial



K-7SW



KNOCKOUTS (inches):	
B:	1/2, 3/4
HH:	2-1/2, 3, 3-1/2, 4
HD:	Ø4.281 HUB OP

480A Continuous/600A Max., 7 Terminal, 3 Phase, 4 Wire, Wye or Delta, Type K-7, Residential/Commercial/Industrial

Cont. Amp Rating	Type	Service	Connectors	Dimensions (inches)			Hub Opening	Enclosure Material	Catalog Number
				W	H	D			
Approved for FPC, FP&L, TECO and J.E.A.									
480/600	K-7T	OH/UG	1/2-20 Stud	20	43	6	(2) Large	Steel	9817-9526
480/600	K-7T	OH/UG	1/2-20 Stud	20	43	6	(2) Large	Aluminum	9817-9527
Approved for FP&L									
480/600	K-7SW	OH/UG	1/2-20 Stud	26	37.6	6	(2) LCP	Steel	9817-9802

All units are UL listed.

Optional manual bypass 58888 available, normally for utility use only (3 required).

Ground Lug 56734 included with device.

K-7 and K-7T can be used for 1 phase service by using specially programmed Landis & Gyr type S-4 meter (contact utility). Connect phase conductors to left and right phase connectors. Do not wire to center phase connectors. Connect neutral conductor to neutral bar.

See knockout configuration on page 16 for 9817-9526 and 9817-9527, K-7T.

Recommended Lugs For 9817-9802

Lug Position	Parallel OH & UG Lugs		Single OH & UG Lugs	
	Catalog No.	Type	Catalog No.	Type
Line	56732-M	Std.	56476	Std.
Load	56732-M*	Std.	56476	Std.
Neutral	56732-M*	Std.	56476	Std.

Std In-line lugs for end entry

See pages 18 and 19 for other lug options.

* UL wire bending space requirements limit load side conductors to 350 MCM in a parallel lug or two 500MCM single connectors per phase