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State of Florida



Public Service Commission

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-M-E-M-O-R-A-N-D-U-M- COMMISSION CLERK

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**DATE:** August 5, 2004  
**TO:** Blanca S. Bayó, Commission Clerk and Administrative Services Director  
**FROM:** Rosanne Gervasi, Senior Attorney, Office of the General Counsel  
**RE:** Docket No. 010503-WU – Application for increase in water rates for Seven Springs in Pasco County by Aloha Utilities, Inc.

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The attached "Request for Reconsideration of PAA Order No. PSC-04-0712-PAA-WS Motion to Modify Order No. PSC-02-0593-FOR-WU" was filed in Docket No. 020896-WS. Please also file it in Docket No. 010503-WU. Thank you.

RG/mrd  
Attachment

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SEC   1
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE  
08550 AUG-5  
FPSC-COMMISSION CLERK

ORIGINAL

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TALLAHASSEE, FL 32399-0850

020896-WS  
COMMISSION CLERK  
04 AUG -2 AM 10:24  
RECEIVED-FPSC

July 29, 2004

Dear Commissioners,

REQUEST FOR RECONSIDERATION OF PAA  
ORDER NO PSC-04-0712-PAA-WS  
MOTION TO MODIFY ORDER NO  
PSC-02-0593-FOF-WU

We are customers of Aloha Utilities in the Seven Springs Area of West Pasco County. Order No. PSC-02-0593-FOF-WU was issued in April 2002 for the specific purpose of significantly reducing the incidence of "black water" and related complaints. That Order required removal of 98% of hydrogen sulfide from raw water in Aloha's wells from which underground water is pumped and processed using chlorination as the sole method.

On October 18, 2002 Aloha requested modification of the Order, because it was felt " that achieving the 98% removal standard was at best very expensive and at worst impossible". On July 23, 2003 OPC submitted a letter stating that the "Citizens agree that the 98% removal standard should be replaced with other standards". The letter suggested the use of the regional standard that the Tampa Bay Water Authority (TBW) uses of a total sulfide level of 0.1mg/L . The same letter noted, "Additional standards may also be appropriate depending on the final audit report findings".

On June 9, 2004 Aloha requested that the "fourth ordering paragraph of Order No PSC-02-0593-FOF-WU should be revised to read as follows:

"Ordered that Aloha Utilities, Inc. shall make improvements to its wells 8 and 9 and then to all of its wells as needed to meet a goal of 0.1mg/l of sulfides in its finished water as that water leaves the treatment facilities of the utility. Compliance with such requirement shall be determined based

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
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see e-filed copy)

(3). Since Aloha does not have a central treatment plant and water from different wells are pumped into the distribution manifold there is a possibility that hydrogen sulfide levels are variable in different parts of Aloha's transmission and distribution system. Therefore it is important to check hydrogen sulfide levels at different sites, at the domestic meter on a rotational basis. Since hydrogen sulfide levels fluctuate seasonally, monthly tests are also necessary for ensuring compliance to the standard. Once a year sampling is not adequate for process control.

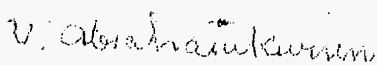
(4). Aloha will soon receive water from Pasco County Water utility. Since Pasco County has not agreed to ensure that the water delivered to Aloha will meet the TBW standard, there is a possibility that such water may contain higher concentrations of hydrogen sulfide than the TBW standard. Mixing of water from Pasco County Utility and water from the Aloha wells will take place; without careful blending and further treatment, the mixed water may contain more hydrogen sulfide levels than the TBW water standard. This lack of uniformity of hydrogen sulfide levels in Aloha's distribution system may result in persistence of the pattern of black water distribution now seen in the Seven Springs area.

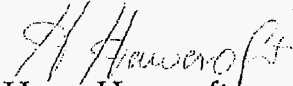
(5). Since Aloha does not undertake monitoring of hydrogen sulfide levels as part of process control and oxidant levels are manually adjusted, there is always the possibility of a mismatch between the two. An adequate chlorine residual is no guarantee of conversion of all hydrogen sulfide to sulfate. Elemental sulfur is almost always a likely intermediate product. In view of the association between elemental sulfur and black water, recently emphasized by the latest FDEP guidelines, it seems unwise not to include elemental sulfur within the standard in any attempt to reduce the incidence of black water.

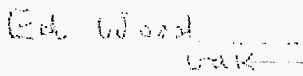
As these reasons are based on a more accurate interpretation of the TBW standard and on data obtained from the audit, we respectfully request that the suggestions made previously by Dr Kurien in his letter of June 13 and submitted by the OPC to the PSC on June 16 be seriously evaluated for their suitability and included in the modification of Order PSC-02-0593-FOF-WU.

We thank you for your reconsideration of your vote in this matter before the issuance of a final order.

Yours sincerely

  
V. Abraham Kurien

  
Harry Hawcroft

  
Ed Wood

CERTIFICATION OF SERVICE

I HEREBY CERTIFY THAT a true and exact copy of the above and foregoing REQUEST FOR RECONSIDERATION OF PAA ORDER NO PSC 04-0712-PAA-WS MOTION TO MODIFY ORDER NO PSC-02-0593-FOF-WU has been furnished by US Mail or electronic transmission to the following parties of record On July 29, 2004

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