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MARTIN S. FRIEDMAN, P.A.
VALERIE L. LORD
BRIAN J. STREET

November 9, 2006

HAND DELIVERY

RECEIVED-FPSC
05 NOV -9 PM 12:12
COMMISSION
CLERK

Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Docket No. 060261-WS; Utilities, Inc. of Pennbrooke's Application for Rate Increase
in Lake County, Florida
Our File No.: 30057.121

Dear Ms. Bayo:

The following are the Utility's responses to Staff's Third Data Request dated October 23, 2006:

- CMP _____
- COM _____ (1) For each pro forma plant addition/project reflected on MFR Schedule A-3, please provide the utility's approved "Capital Project Request" from Integrated Solutions System.
- CTR _____
- ECR _____ RESPONSE: Please refer to Exhibit 1 Attached hereto.
- GCL _____
- OPC _____ (2) Please provide a copy of the utility's sludge hauling contract.
- RCA _____ RESPONSE: Please refer to Exhibit 2 attached hereto.
- SCR _____
- SGA _____
- SEC 1 _____
- OTH _____

DOCUMENT NUMBER-DATE

10348 NOV-9 8

FPSC COMMISSION CLERK

Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
November 9, 2006
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(3) On September 29, 2006, Pennbrooke provided its response to Audit Document Request PB-107-28. Included in Pennbrooke's response was a "Data file" for repair, gas costs and fees for fleet management for each vehicle.

(a) Please provide the invoices that support each charge on the "Data file".

RESPONSE: Please refer to Exhibit 3(a) attached hereto.

(b) What is Pennbrooke's policy regarding personal use of its vehicles? If employees are allowed to use utility vehicles for personal use, provide an estimate of time the vehicle is used for personal reasons.

RESPONSE: The personal use of vehicles is prohibited by Utility policy.

(c) Per MFR Schedule B-7 and B-8, transportation expenses have increased by \$5,776 (115%) since the 2001 test year. The utility's explanation was an increase in fuel costs, additional vehicles, staff increases and use of a generator. Please further explain each item in detail. Estimate the miles driven per week on utility business for each vehicle.

RESPONSE: The generator was installed in 2003 and is required by rule for reuse plants. Vehicle 0105 was driven 22,500 miles in 2005, and vehicle 0511 was driven 38,865 miles in 2005.

(d) Please explain the larger amount of fuel consumption (\$8,836) for this utility.

RESPONSE: Fuel costs have increased dramatically in the past year. It is not abnormal for a utility using three vehicles over the course of one year to have such fuel costs.

(4) With regard to the incremental reuse plant (i.e. filtration and pumping equipment) installed by the utility in order to provide reuse and the reuse transmission and

Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
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distribution system, provide, by primary operation and maintenance expense account, the associated expenses to operate its entire reuse system. The utility response should include, but not be limited to, the following information: The name of employees responsible for reuse operations, their total salary, their time spent on reuse versus wastewater, the utility's basis and support documentation used to derive their time spent on reuse, their associated salary amount for reuse; their total pensions and benefits; their associated amount of pensions and benefits for the reuse; the utility's basis and support documentation used to derive associated pensions and benefits for the reuse; the associated purchased power, materials and supplies, chemicals, contractual services, transportation, insurance and/or miscellaneous expenses for reuse; and the utility's basis and support documentation used to derive associated purchased power, materials and supplies, chemicals, contractual services, transportation, insurance and/or miscellaneous expenses for reuse.

RESPONSE: At the Pennbrooke WWTP, the treatment components that are solely reuse related are the following: two (2) sand filters, one (1) reuse transfer pump, 6" reuse transmission main, emergency generator, turbidity analyzer, chlorine residual analyzer and associated instrumentation, and two (2) filter backwash pumps. The Utility does not differentiate between reuse and non-reuse expenses when performing operation, maintenance, and repair activities at the WWTP. Therefore, it would be impossible to supply accurate and reliable information in an attempt to quantify the incremental cost. The Utility's staff operates the Pennbrooke plant as a single treatment facility, not as separate reuse and non-reuse components. Staff does not categorize the specific time spent or activities conducted on the reuse facilities separate from the non-reuse facilities. A single electric service provides power to the WWTP as a whole.

- (5) In the utility's response to Audit Document Request PB-107-30, it stated "The elimination of the sand filter translates into a substantial reduction in operating expense including water and energy used for backwashing, backwash pump maintenance, media monitoring and replacement, and roof replacement.

Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
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(a) Please state what the resulting reduction amount is for test year expenses.

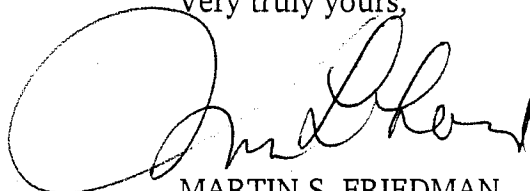
RESPONSE: Test year purchased power expenses are actual expenses. Certain invoices for purchased power have been previously provided in the course of this proceeding through the audit and through the Utility's responses to data requests. At this time the Utility cannot quantify a reduction to purchased power and is unsure if there even would be any reduction. Please see the response to data request 5(b).

(b) Please provide all of the utility's calculations, bases, work papers, and support documentation for the resulting reduction amount of test year expense.

RESPONSE: The reference to cost savings due to the use of less power are intuitive comments that reflect an understanding that the installation of new pumps built to factory specifications will operate more efficiently than pumps of the same design that have been in service for many years. The pump controls are being replaced with newer technology, not the pumps themselves. The reduction in purchased power for all three projects is considered an ancillary benefit, not one that has been quantified on a speculative basis.

Please contact me if you have any questions.

Very truly yours,



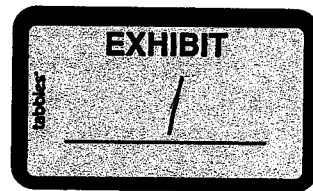
MARTIN S. FRIEDMAN
VALERIE L. LORD
For the Firm

VLL/tlc
Enclosures

Ms - Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
November 9, 2006
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cc: Jennifer Brubaker, Esquire, Office of General Counsel (w/o enc. - by hand delivery)
Mr. Troy Rendell, Economic Regulation (w/ enc. - by hand delivery)
Ms. Cheryl Bulecza-Banks, Economic Regulation (w/o enc. - by hand delivery)
Ms. Frances Lingo, Economic Regulation (w/o enc. - by hand delivery)
Ms. Nina Merta, Economic Regulation (w/o enc. - by hand delivery)
Ms. Patti Daniel, Economic Regulation (w/o enc. - by hand delivery)
Ms. Sonica Bruce, Economic Regulation (w/o enc. - by hand delivery)
Mr. Stanley Rieger, Economic Regulation (w/o enc. - by hand delivery)
Steven M. Lubertozzi, Chief Regulatory Officer (w/enclosures - by U.S. Mail)
Kirsten Weeks, CPA (w/o enclosures - by U.S. Mail)
John Hoy, Regional Vice President for Operations (w/o enclosures - by U.S. Mail)
Patrick C. Flynn, Regional Director (w/enclosures - by U.S. Mail)
Mr. Frank Seidman (w/o enclosures - by U.S. Mail)
Scott D. Fogelsanger, Vice President (w/o enclosures - by U.S. Mail)
Stephen Reilly, Esquire, Office of Public Counsel (w/enclosures - by U.S. Mail)

M:\1 ALTAMONTE\UTILITIES INC\PENNBROOKE\(.121) 2005 RATE CASE\PSC Clerk 13 (Data Request 3).ltr.wpd



APPROVED



Project Request

Florida FL C107 0691 2291
Region State Co# Sub# ID #

Priority Level: 5 - Discretionary

Project Created: 03/31/04

Related to ID #:

Project Name: **Office Construction-Pennbrooke WTP**

Company: Utilities, Inc. of Pennbrooke

Expenses to Start: 03/31/2006

System: Pennbrooke

Expenses to End: 07/15/2006

Service(s): Water Sewer Water & Sewer Reuse Other...

Benefits Category: Regulatory Requirement Expand Capacity Ongoing Maintenance
 Improve Service Provide New Service Other (explain below)
 Cost Reduction Improve Safety



Estimated Costs by Component

WO#: 107-0691-115-06-01

PO#: _____ GL#: _____

Component(s)	Component Description	Original Estimate	Asset Designation
10002	Capitalized Time	\$885.00	<input checked="" type="radio"/> New Asset(s) <input type="radio"/> Upgrading Asset(s) <input type="radio"/> Repairing Asset(s) <input type="radio"/> Replacing Asset(s) If replacing existing equipment, when (year) was the original asset placed in service? _____
10003	IDC	\$356.00	
10303	Equipment & Labor	\$16,300.00	
10303	Contingency	\$2,445.00	

Cap Plan Estimate: \$28,000.00 Estimate Totals: \$19,986.00

Capitalized Time Estimate: 30 Hours Total # of Customers: 1,350 # of Affected Customers: 1,350 Cost per Customer: \$14.80

Annual Offset In Expenses: _____



Signature Authority & Approvals

Submitted by: **Bryan K. Gongre** Title: Regional Manager Date: 05/15/06

\$5,000 - \$25,000 **Patrick Flynn** Regional Director Date: 05/16/06

\$25,001 - \$75,000 _____ Regional VP of Operations Date: _____

\$75,001 - \$100,000 _____ VP of Operations Date: _____

Over \$100,000 _____ Chief Executive Officer Date: _____

APPROVED



Project Request

Florida	FL	C107	0691	2291
Region	State	Co#	Sub#	ID #

Priority Level: 5 - Discretionary

Project Created: 03/31/04

Related to ID #:

Project Name: **Office Construction-Pennbrooke WTP**

Company: **Utilities, Inc. of Pennbrooke**

Expenses to Start: **03/31/2006**

System: **Pennbrooke**

Expenses to End: **07/15/2006**



Attachment(s) - Ref. # 2291

Fax QuickMail / Email
 Interoffice Mail Hand Delivery

Project Description
List of System Projects

Project Description

See Notes Screen for add'l info

Estimate Total: **\$19,986.00**

Construction of suitable office space within the existing WTP building. This will include framing a partition wall between the HSP's and the east end of the building with an 8' drop ceiling. Included will be bathroom facilities, a shower, hot water tank and a lift station with 2" force main to transport wastewater to the existing RV dump station FM. An attic ventilator with automatic temperature control will be installed to reduce the attic space temperature and a suitable A/C unit will be installed. The existing north doors will be removed and blocked in the bathroom area and the south double door will be converted to a single 32" door with a window. The electric service will be updated as needed to facilitate the A/C unit and hot water tank including appropriate lighting.

Justification & Benefits

A small office space is needed for wastewater process control, file keeping for water and wastewater operations, a central location for communication, (faxing of services orders etc.) and bathroom facilities for personnel. Currently, process control for the WWTF is minimal due to the lack of office space, personnel have to travel to bathroom facilities off site, and filing is done in a large mail box exposed to the elements.

Alternatives

1. Purchase a small 10' by 20' office trailer with bathroom facilities installed. This option requires extensive permitting through Lake County that would take a lengthy period to accomplish. Through additional research, we have determined that the office trailer would need to be 10' x 30' to house restroom facilities. The WWTF property does not have available space to accommodate a unit of this size and still allow access through our property for Progress Energy and TECO to maintain their equipment in the utility easement.
2. Build a small office addition to the WTP building. This is a viable option, but would require a contractor and permitting which will require parking and handicap access.
3. Install no office. This is not a viable option because the continuing lack of office space makes record keeping, communication, and daily operations difficult at best.

Timing of Project

The project would commence upon approval. No permitting is required. The project can be completed by the rate case deadline.

System Information

- Acquisition Date

APPROVED



Project Request

Florida	FL	C107	0691	2291
Region	State	Co#	Sub#	ID #

Priority Level: 5 - Discretionary

Project Created: 03/31/04

Related to ID #:

Project Name: **Office Construction-Pennbrooke WTP**

Company: **Utilities, Inc. of Pennbrooke**

Expenses to Start: **03/31/2006**

System: **Pennbrooke**

Expenses to End: **07/15/2006**

09/26/2003

● Facility Update

Utilities, Inc. of Pennbrooke was aquired on September 29, 2003, and is both a water and wastewater utility. The Water Treatment Facilities consist of two wells with a 600-gpm capacity, four (4) ground storage tanks, one with a 10,000-gallon capacity, and the other three with 50,000-gallon capacity each, one (0.100 mgd) sand filter, three high service pumps rated at 600 gpm each, disinfection with gas chlorination facilities rated at 50 pounds per day, two hydropneumatic tanks, one 7500 gal. capacity and one 10,000 gallon capacity. Distribution lines consist of ductile iron and PVC ranging from 2 inch to 8 inch in size. Current flows average 0.300 mgd.

The Wastewater treatment Facilities consist of a 0.180 MGD extended aeration plant with surge capacity, digester , filtration, and hypochlorination disinfection facilities. Four on-site ponds are used for reject, percolation, and effluent disposal. The Pennbrooke golf course uses reclaimed water for irrigation. Th collection system consists of six lift stations, PVC force mains and PVC gravity mains along with some vitrified clay piping. Current flows average 0.110 mgd.

● Anticipated Growth in Area

8/04-There are currently 1,213 connections with approximately 101 new connections added in the first 7 months of 2004. Buildout is estimated to be less than 1,300 connections.

● Rate Case Information

Last Order Date:

Order Number:

Type:

Docket:

Test Year:

● List of Other Projects for System - by Project Status

Sub	Status	Proj ID	Project Name	Date	Estimate	Spent
0691	Placed In Service	2542	Hydropneumatic & Ground Storage Tank	10/01/04	\$12,600	\$8,475
0691	Placed In Service	2997	Pennbrooke WTP / System Improvements	03/01/06	\$80,042	\$67,026
0691	Placed In Service	2291	Office Construction-Pennbrooke WTP	03/31/06	\$18,745	\$8,300
0691	Closed	1963	Pennbrooke WWTF FDEP Permit Renewal	11/15/03	\$8,000	\$7,048
0691	Closed	2361	Pennbrooke WTP SJRWMD CUP Renewal	04/25/04	\$9,850	\$9,486
0691	Closed	2292	Diffused Aeration System / Pennbrooke	05/01/04	\$88,500	\$99,632
0691	Closed	2372	Pennbrooke Hydraulic Analysis w/Maps	05/01/04	\$17,000	\$17,010
0691	Closed	2294	Safety Upgrades - Pennbrooke	07/15/04	\$47,500	\$48,663
0691	Closed	2304	#1 Well Pump Inpection/Rehabilitation	09/01/04	\$15,192	\$18,943
0691	Closed	2305	#2 Well Pump Inpection/Rehabilitation	10/01/04	\$15,942	\$11,904
0691	Closed	2982	Sanitary Collection System Rehabilitation	02/01/05	\$65,900	\$48,202
0691	Closed	3329	L/S Remote Generator Receptacle	03/18/05	\$9,282	\$8,782
691	Proposed	9296	Well #1 replacement	01/01/09		

APPROVED

Utilities, Inc. - Integrated Solutions System



Project Request

Florida FL C107 0691 2291
Region State Co# Sub# ID #

Priority Level: 5 - Discretionary

Project Created: 03/31/04

Related to ID #:

Project Name: **Office Construction-Pennbrooke WTP**

Company: **Utilities, Inc. of Pennbrooke**

Expenses to Start: **03/31/2006**

System: **Pennbrooke**

Expenses to End: **07/15/2006**

APPROVED



Project Request

Florida FL C107 0691 2997
Region State Co# Sub# ID #

Priority Level: 1 - Regulatory

Project Created: 12/28/04

Related to ID #: 2372

Project Name: **Pennbrooke WTP / System Improvements**

Company: **Utilities, Inc. of Pennbrooke**

Expenses to Start: **03/01/2006**

System: **Pennbrooke**

Expenses to End: **08/15/2006**

Service(s): Water Sewer Water & Sewer Reuse Other...

Benefits Category: Regulatory Requirement Expand Capacity Ongoing Maintenance
 Improve Service Provide New Service Other (explain below)
 Cost Reduction Improve Safety



Estimated Costs by Component

WO#: 107-0691-115-06-02

PO#: _____

GL#: _____

Component(s)	Component Description	Original Estimate
10002	Capitalized Time	\$885.00
10003	IDC	\$2,281.00
10317	Water Piping Installation & Materials	\$61,920.00
10303	Demolition	\$7,872.00
10303	Permits	\$250.00
10305	Engineering	\$10,000.00

Asset Designation

New Asset(s)
 Upgrading Asset(s)
 Repairing Asset(s)
 Replacing Asset(s)

If replacing existing equipment, when (year) was the original asset placed in service?

Cap Plan Estimate: \$81,000.00 Estimate Totals: \$83,208.00

Capitalized Time Estimate: 30 Hours Total # of Customers: 1,290 # of Affected Customers: 1,290 Cost per Customer: \$64.50

Annual Offset In Expenses: _____



Signature Authority & Approvals

Submitted by: **Bryan Gongre** Title: Regional Manager Date: 05/15/06

\$5,000 - \$25,000 **Patrick Flynn** Regional Director Date: 05/16/06

\$25,001 - \$75,000 **John Hoy** Regional VP of Operations Date: 05/26/06

\$75,001 - \$100,000 **Lisa Crossett** VP of Operations Date: 05/30/06

Over \$100,000 _____ Chief Executive Officer Date: _____

APPROVED



Project Request

Florida FL C107 0691 2997
Region State Co# Sub# ID#

Priority Level: 1 - Regulatory

Project Created: 12/28/04

Related to ID #: 2372

Project Name: **Pennbrooke WTP / System Improvements**

Company: **Utilities, Inc. of Pennbrooke**

Expenses to Start: **03/01/2006**

System: **Pennbrooke**

Expenses to End: **08/15/2006**



Attachment(s) - Ref. # 2997

Fax QuickMail / Email
 Interoffice Mail Hand Delivery

Project Description
List of System Projects

Estimate(s) Required

CPH Proposal #U0774

ECO - 2000 Demo Proposal dated 2/27/06

Shafer Development Proposal dated 5/11/06

Project Description

See Notes Screen for add'l info

Estimate Total: **\$83,208.00**

Construct distribution system improvements as recommended by the recently completed hydraulic analysis of the water system. Components include:

- installing 600 LF of 12" PVC water main in parallel with the existing 8" water main between the hydropneumatic tank outlet and the point of connection to the distribution system.
- demolition and removal of the existing aerator/storage tank and the sand filter.

Justification & Benefits

In response to frequent low pressure complaints, a hydraulic analysis of the WTP and distribution system was done (WO#2372). While the WTP components appear to be performing properly during peak demand, the analysis identified certain distribution components that require upgrading to resolve the low pressure complaints.

Standard engineering design practices dictate that peak flow velocity through a pipe should not exceed 8.0 fps. The existing 8" supply line to the distribution system is currently operating at 11.79 fps at peak demand, well above design criteria. This creates a restriction or bottleneck that generates back pressure on the high service pumps. Not enough water can pass through the 8" WM generating low pressure complaints. By installing a parallel 12" water main the velocity would be significantly decreased to approximately 3.02 fps. This project will allow more water to enter the system, generate additional revenues, and significantly improving service to the customer base.

Under an FDEP approved pilot study, the Utility began monitoring water quality constituents to determine whether the existing sand filter and aerator/storage tank were necessary to treat the water supply and still meet water quality limits, particularly iron. Data accumulated over a three month period has identified that the use of an iron sequestrant negates the need to aerate or filter the water. Therefore, after we receive pending formal FDEP approval, the aerator and filter units can be removed. The elimination of the sand filter translates into a substantial reduction in operating expense including water and energy used for backwashing, backwash pump maintenance, media monitoring and replacement, and roof replacement. The existing aerator is difficult to maintain safely due to inadequate access, confined space, and undersized trays that cause overflow allowing iron to oxidize and discolor the tank exterior. As a result, the storage tank must be frequently cleaned and painted. Both the filter and aerator are undersized and restrict the plant flow. In the event that DEP determines that these components are necessary to meet water quality limits, both units will need to be modified or replaced to address the plant bottleneck as well as provide adequate treatment.

Alternatives

1. Postpone the Project - This does not appear to be feasible due to low pressure complaints.

APPROVED



Project Request

Florida FL C107 0691 2997
Region State Co# Sub# ID #

Priority Level: 1 - Regulatory

Project Created: 12/28/04

Related to ID #: 2372

Project Name: **Pennbrooke WTP / System Improvements**

Company: **Utilities, Inc. of Pennbrooke**

Expenses to Start: **03/01/2006**

System: **Pennbrooke**

Expenses to End: **08/15/2006**

2. Install the water main but postpone the demolition - The cost of the demolition and tank removal is \$7,872.00. This option is feasible but does not address the aesthetics of the facility . Both tanks are highly visible to the community and are unsightly in their current state.

Timing of Project

It would be best to perform this work in the 2006 low season before the peak demand period occurs in April and May 2007. In order to include these improvements in the rate case we must move quickly due to permitting through FDEP.

System Information

● **Acquisition Date**

09/26/2003

● **Facility Update**

Utilities, Inc. of Pennbrooke was aquired on September 29, 2003, and is both a water and wastewater utility. The Water Treatment Facilities consist of two wells with a 600-gpm capacity, four (4) ground storage tanks, one with a 10,000-gallon capacity, and the other three with 50,000-gallon capacity each, one (0.100 mgd) sand filter, three high service pumps rated at 600 gpm each, disinfection with gas chlorination facilities rated at 50 pounds per day, two hydropneumatic tanks, one 7500 gal. capacity and one 10,000 gallon capacity. Distribution lines consist of ductile iron and PVC ranging from 2 inch to 8 inch in size. Current flows average 0.300 mgd.

The Wastewater treatment Facilities consist of a 0.180 MGD extended aeration plant with surge capacity, digester , filtration, and hypochlorination disinfection facilities. Four on-site ponds are used for reject, percolation, and effluent disposal. The Pennbrooke golf course uses reclaimed water for irrigation. Th collection system consists of six lift stations, PVC force mains and PVC gravity mains along with some vitrified clay piping. Current flows average 0.110 mgd.

● **Anticipated Growth in Area**

8/04-There are currently 1,213 connections with approximately 101 new connections added in the first 7 months of 2004. Buildout is estimated to be less than1,300 connections.

● **Rate Case Information**

Last Order Date:

Order Number:

Type:

Docket:

Test Year:

● **List of Other Projects for System - by Project Status**

<u>Sub</u>	<u>Status</u>	<u>Proj ID</u>	<u>Project Name</u>	<u>Date</u>	<u>Estimate</u>	<u>Spent</u>
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Hydropneumatic & Ground Storage Tank

APPROVED



Project Request

Florida FL C107 0691 2997
Region State Co# Sub# ID #

Priority Level: 1 - Regulatory

Project Created: 12/28/04

Related to ID #: 2372

Project Name: **Pennbrooke WTP / System Improvements**

Company: Utilities, Inc. of Pennbrooke

Expenses to Start: 03/01/2006

System: Pennbrooke

Expenses to End: 08/15/2006

0691	Placed In Service	2997	Pennbrooke WTP / System Improvements	03/01/06	\$80,042	\$67,028
0691	Placed In Service	2291	Office Construction-Pennbrooke WTP	03/31/06	\$18,745	\$8,300
0691	Closed	1963	Pennbrooke WWTF FDEP Permit Renewal	11/15/03	\$8,000	\$7,048
0691	Closed	2361	Pennbrooke WTP SJRWMD CUP Renewal	04/25/04	\$9,850	\$9,486
0691	Closed	2292	Diffused Aeration System / Pennbrooke	05/01/04	\$88,500	\$99,632
0691	Closed	2372	Pennbrooke Hydraulic Analysis w/Maps	05/01/04	\$17,000	\$17,010
0691	Closed	2294	Safety Upgrades - Pennbrooke	07/15/04	\$47,500	\$48,663
0691	Closed	2304	#1 Well Pump Inspection/Rehabilitation	09/01/04	\$15,192	\$18,943
0691	Closed	2305	#2 Well Pump Inspection/Rehabilitation	10/01/04	\$15,942	\$11,904
0691	Closed	2982	Sanitary Collection System Rehabilitation	02/01/05	\$65,900	\$48,202
0691	Closed	3329	L/S Remote Generator Receptacle	03/18/05	\$9,282	\$8,782
691	Proposed	9296	Well #1 replacement	01/01/09		



**AGREEMENT FOR TRANSPORTATION, TREATMENT AND DISPOSAL OF
DOMESTIC WASTEWATER RESIDUALS**

This AGREEMENT by and between AMERICAN PIPE & TANK, INC. D/B/A/ CENTRAL PROCESS (hereinafter CENTRAL PROCESS) and
UTILITIES INC. OF PENNBROOKE whose address is 200 Weathersfield Ave
Altamonte Springs, FL 32714
hereinafter referred to as CLIENT.

WITNESSETH THAT

WHEREAS, CENTRAL PROCESS is the owner and operator of a Residuals Management Facility, Permit #FLA010776 and Agricultural Use Site, and

WHEREAS, said treatment and disposal site has been approved and operating under Florida Department of Environmental Protection (FDEP) permit file in compliance with Chapter 62-640 FAC and

WHEREAS, the CLIENT owns and operates the domestic wastewater treatment plant permitted as FLA010570

hereinafter referred to as "SOURCE" and has the need to dispose of the waste residual generated by the "SOURCE" and

WHEREAS, the CLIENT and Central Process both operate treatment facilities in compliance with Chapter 62-600 FAC, the degree of treatment at the plants determined according to said Chapter the true identity (treatment plant) referred to as "GENERATOR". For the ease of permitting Central Process will be referred to as "GENERATOR".

WHEREAS, as a condition precedent to the obtaining a valid operating permit for the SOURCE, FDEP requires the GENERATOR to file an Agricultural Use Plan whereby the SOURCE certifies that his residuals shall be either stabilized to Class "C" or above at the plant, and meet the chemical criteria for residuals suitable for land application.

NOW THEREFORE, for and in consideration of the mutual terms, covenants and conditions to be complied with on the part of the respective parties hereto, it is agreed as follows:

1. Nothing in this Agreement shall supercede or take precedence over the obligations and responsibility of each party to operate and maintain his individual plant in compliance with the frequency and schedule stated in Chapter 62-640, FAC.
2. The CLIENT hereby covenants and agrees:
 - A. If the CLIENT stabilizes the residuals to Level "B" or above, none of said residuals can be mixed with unstabilized materials. If mixing has occurred, the entire load will be required to be stabilized at the Central Process Plant.
 - B. The CLIENT shall pay for the transportation, treatment and disposal as dictated in the AGREEMENT PAY SCHEDULE "A" attached to this contract.
 - C. The CLIENT warrants that the residuals delivered to the generator shall not contain any hazardous, toxic or radioactive waste or substances as defined by applicable federal, state and local laws or restrictions.
3. Central Process hereby covenants and agrees:
 - A. To maintain, monitor and operate the lime stabilization plant and residuals disposal site in compliance with Chapter 62-640, FAC.
 - B. To accept all responsibility for the proper measurement, stabilization and land application for the proper disposal of the residuals as required by Chapter 62-640, FAC.

(CONTINUED ON REVERSE SIDE)

- C. To maintain a record of the total quantity of residuals land applied and file with RDEP an annual summary of the total quantity of residuals, heavy metals, and nitrogen land applied, in which The CLIENT is a contributor thereof, to meet the Generator's certification requirements of the Agricultural Use Plan for this CENTRAL PROCESS facility.
4. It is further understood by both parties that:
- A. Both parties understand that this Agreement is subject to the rules, regulations and directives of the regulatory agencies and agree that in the event such rules, regulations and directives require modification of this Agreement, they will negotiate in good faith to make such modification.
- B. Upon arrival onsite for treatment, residuals from the CLIENT'S plant, Central Process has the right to refuse treatment of said residuals, if it demonstrates properties that are not consistent with Land Application. The CLIENT will be responsible for the removal and proper disposal of material.
5. It is specifically agreed and understood by all parties hereto, that the rate stated in the Agreement Pay Schedule "A" is for the proper treatment, transportation and disposal of residuals delivered by AMERICAN PIPE & TANK, INC. to the Central Process Site and proper disposal of the same.
6. Payment shall be made by Customer within thirty (30) days after receipt of an invoice from Contractor. In the event that any payment is not made when due, Contractor at its sole option, may, at any time, terminate this Agreement on notice to Customer and the Department of Environmental Protection. Contractor may impose and Customer agrees to pay, a late fee not to exceed the maximum rate allowed by applicable law for all past due payments.
7. Contractor shall not be responsible for damage to Client's pavement or other driving surface resulting from the weight of Contractor's vehicles servicing the wastewater treatment plant on routes designated by Customer.
8. Changes in the Schedule of Charges, capacity and type of equipment may be agreed to orally or in writing by the parties. Consent to oral changes shall be evidenced by the actions and practices of the parties.
9. Since disposal related charges and fuel costs are a significant portion of the cost of Contractor's services provided hereunder, Contractor may increase the unit price of the Schedule of Charges in an amount equal to any equivalent unit increase in disposal or fuel costs.
10. The term of this Agreement shall be for three (3) years from the effective date of service and shall be automatically renewed for like terms unless either party shall give written notice of termination (Certified Mail) to the other at least sixty (60) days prior to termination of the initial term or any renewal term. In the event the CLIENT terminates this Agreement other than as provided above, CLIENT shall pay to Contractor as liquidated damages, a sum calculated as follows: (a) if the remaining term under this Agreement is six months or more, CLIENT shall pay its most recent monthly charge multiplied by six (6); (b) if the remaining term under this Agreement is less than six months, CLIENT shall pay its most recent charge multiplied by the number of remaining months in the term.
11. In the event of a breach of this Agreement by either party, the breaching party shall pay all reasonable attorney's fees, collection fees and costs of the other party incident to any action brought to enforce this Agreement.

This AGREEMENT shall be binding on the parties and their successors and assigns.

IN WITNESS WHEREOF, the parties have caused these present to be executed this 17 day of September, 2003.

C. Allen
Witness

By:

George S. Conomos
CENTRAL PROCESS

Ronald Sasic
Witness

Patrick C. Flynn
Client (TITLE)
REGIONAL DIRECTOR
PATRICK C. FLYNN
(Print Name)

AGREEMENT PAY SCHEDULE

"A"

IN AGREEMENT WITH PARAGRAPH C, THE COST
WILL BE \$81.00 PER 1,000 GALLONS WITH A
2,500 GALLON MINIMUM CHARGE AND PAYABLE
WITHIN THIRTY (30) DAYS



Initial

EXHIBIT
3(a)

REQUEST FOR MANUAL/COMPUTER CHECK

PAYABLE TO: Ray Valdes, Tax Collector
PO Box 210
SANFORD FL 32732

VENDOR # V1178
INVOICE NO.: TAG-0105
\$ AMOUNT: \$959.57 (2)
Nine hundred fifty nine.
and fifty-seven cents
(AMOUNT WRITTEN OUT)

MAIL TO: Altamonte Office
Attn: Joni Welzien

INV. DATE: 12/4/00

PURPOSE: Pay sales tax and
obtain title & tag for
new vehicle # 0105

CODES: 090-0600-3917000 AMOUNTS: 959.57

REQUESTED BY: J. Welzien DATE NEEDED: 12/11/00

ACCTG. DIV. APPROVAL: _____

Approved by: [Signature]

Purchase price \$14,603.65
Sales Tax = 926.22
(6% + \$50.00)
Title & Reg = 33.35
➤ \$959.57

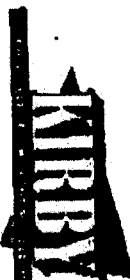
Post-it Fax Note	7671	Date	12/4/00	# of pages	(2)
To	NANCY	From	JONI		
Co./Dept.	NB	Co.	FL		
Phone #		Phone #			
Fax #		Fax #			

NOV-29-2000 09:52

UTILITIES INC

B47 498 2066

P.001/001



1691 J.A. Cochran Bypass • P.O. Box 370
CHESTER, S.C. 29706

(803) 377-4147

1-800-949-8029

UTILITIES INC. OF FLORIDACUST # 13937

ADDRESS 200 WEATHERFIELD AVE.
ALTAMONTE SPRINGS FL 32714

(H) - (W) - 11320

YEAR	MAKE	MODEL	USED OR NEW	VEHICLE IDENT. OR SERIAL NO.
2001	CHEVROLET	PICKUP	NEW	18CCS1ANX10169360
SALESMAN FLEET DEPARTMENT				

AREA TRUCK COLLISION-AMT. DEDUCTIBLE

INSURANCE COVERAGE INCLUDES
 PARTICULARITY - AMT.
 PROPERTY DAMAGE - AMT.

GROUP	DESCRIPTION	PRICE
#0105		
		092-2600-3917000
This early warranty, if any, applying to this vehicle was drawn obtained by the manufacturer. The selling dealer hereby expressly disclaims all warranties, either express or implied, including any implied warranties of merchantability or fitness for a particular purpose, and neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of this vehicle. Buyer shall not be entitled to recover from the selling dealer any consequential damages, damages to property, damages for loss of use, loss of time, loss of profits, or income, or any other incidental damages.		

DISCLAIMER OF WARRANTIES

USED CAR TRADED

VEHICLE IDENT. OR SERIAL NO.

DATE	INVOICE NO.	STOCK NO.
11/16/00	38593	AS231
DESCRIPTION	SALE	
PICKUP	14603 65	

Post-UP For Note 7671

To: *Paul* Date: *11/25* 1 of 1 pages

Co./Dept: *Chy*

Phone #

Fax #

FINANCING	TOTAL CASH PRICE	14603 65
INSURANCE	TOTAL TIME PRICE	14603 65
REF-POST		N/A
CASH/OWNERS/INVT		N/A
FACTORY/REBATE		N/A
USED CASH ALLOWANCE		N/A
DEBIT/DOLLARS		N/A
1 14603 65 (REBATE)		N/A
TOTAL		14603 65

Always Bring Your
Car Here For
Factory Authorized
Service

4020670

RECEIVED
NOV 02 2000

Customer Name

INSTALL HITCH

DESCRIPTION
PARTS
LABOR

DATE

Labor
Amount

SECRET SUBTOTAL	217.00
CUSTOMER TOTAL	230.00

***** PAY THIS AMOUNT *****

THIS TRANSACTION IS GOVERNED BY TERMS AND CONDITIONS ON REVERSE SIDE. SIGNED _____
NO REFUND WITHOUT THIS INVOICE. 15% HANDLING CHARGE ON ALL RETURNED ITEMS.
NO ITEMS RETURNABLE AFTER 10 DAYS. NO DISCOUNTS. NO REFUND ON ELECTRICAL PARTS.

17-18-00

H00

JAN - 3 2001

RECEIVED

#00165

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE BY THE MARKINGS.

DATE OF DECLASSIFICATION: 0000-0000

CLASSIFICATION AUTHORITY: 1.4

DECLASSIFY ON: OADR

FOR ADDITIONAL INFORMATION CONTACT: OADR, P.O. BOX 12125, WASHINGTON, DC 20512

STANDARD FORM NO. 64

OFFICE OF MANAGEMENT AND BUDGETARY OPERATIONS

U.S. DEPARTMENT OF COMMERCE

WASHINGTON, D.C. 20510

DESCRIPTION	QUANTITY	UNIT PRICE	TOTAL	TAX	TOTAL
ITEM 1	1	145.00	145.00	1.70	146.70
ITEM 2	1	145.00	145.00	1.70	146.70
TOTALS			290.00	3.40	293.40

Tax Total: 3.40

Customer Total: 293.40

*** PAY THIS AMOUNT ***

293.40

[Handwritten Signature]

[Handwritten Signature]

THIS TRANSACTION IS GOVERNED BY TERMS AND CONDITIONS ON REVERSE SIDE. SIGNED _____

NO REFUND WITHOUT THIS INVOICE. 15% HANDLING CHARGE ON ALL RETURNED ITEMS.

NO ITEMS RETURNABLE AFTER 10 DAYS. NO DISCOUNTS. NO REFUND ON ELECTRICAL PARTS.

TERMS: NET 30 DAYS FOLLOWING PURCHASE WITH APPROVED CREDIT.



Chrysler Pontiac Buick Chrysler Jeep Dodge

1691 J.A. Cochran By-Pass
CHESTER, S.C. 29706
(803) 377-4147
1-800-849-9829

STOCK NO.
111370

PURCHASER'S NAME: WELLES LUM OF FLORIDA DATE: 01-27-2005
STREET ADDRESS: 200 HEATHERSFIELD AVE PHONE: 407-369-1700
CITY: ALFAMARTE SPRING COUNTY: SEMINOLE STATE: FL ZIP: 32001 SALESPERSON: WELLES LUM

ENTER MY ORDER FOR ONE NEW USED CAR TRUCK DEMONSTRATOR FACTORY OFFICIAL RENTAL VEHICLE AS FOLLOWS:

YEAR: 2005 MAKE: CHEVROLET MODEL: TRUCK BODY TYPE: TRUCK COLOR: SUMMIT WHITE TRIM:

VIN: 1GCEFLAK75Z230130 TO BE DELIVERED ON OR ABOUT: 01/27/2005 STOCK NO.: 505615

REMARKS: INCLUDED ALL DISCOUNTS AND REBATES
CASH PRICE OF VEHICLE: Inv. # 0511 / 40561
107-0691-3917000
*0511

DEPOSIT RECEIPT:
Dealer hereby acknowledges receipt of the sum of \$ _____ as a Deposit/Partial Payment for the vehicle described above. If this Receipt is for a Deposit, Dealer will refrain from selling the described vehicle for _____ days. This Deposit/Partial Payment IS IS NOT refundable, subject to the conditions on the reverse side and the following: _____

NEGATIVE EQUITY:
I am aware that the balance owed on my trade-in vehicle or the amount owed on my lease turn-in vehicle exceeds the trade-in allowance from Dealer and, as a result, I have requested that the cash price of the vehicle be increased by N/A to cover negative equity from my trade-in/the amount owed on my lease turn-in.

DUE TO INSURANCE REASONS ALL AMERICAN AUTOMALL CANNOT PROVIDE A SERVICE LOANER VEHICLE

TRADE-IN AND OTHER CREDITS		16815.40	40	DOCUMENTARY FEES →	N/A
TRADE-IN ALLOWANCE	N/A	←		← SELLING PRICE →	16815.40
BALANCE OWED ON TRADE	N/A	TAXABLE TOTAL	16815.40	X % SALES TAX	N/A
BALANCE OWED TO:		ODOMETER MILEAGE STATEMENT		COUNTY	SEMINOLE
NET EQUITY	N/A	THE ODOMETER OF THE ABOVE DESCRIBED VEHICLE NOW READS _____ MILES/KILOMETERS.		TITLE FILING FEES	1248.78
DEPOSIT	N/A	AND IS ACCURATE UNLESS CHECKED BELOW		OTHER	N/A
CASH ON DELIVERY	N/A	<input type="checkbox"/> ODOMETER MILEAGE IS NOT ACCURATE REFER TO THE FEDERAL MILEAGE STATEMENT FOR FULL DISCLOSURE			N/A
OTHER	N/A			TOTAL	18064.18
TOTAL CREDIT	N/A			TOTAL CREDIT	N/A
TRADE-IN STOCK NO.	YEAR	MAKE	MODEL	BALANCE DUE	18064.18
BODY TYPE	VIN	MILEAGE			

CONTRACTUAL DISCLOSURE STATEMENT (USED VEHICLES ONLY) THE INFORMATION YOU SEE ON THE WINDOW FORM FOR THIS VEHICLE IS PART OF THIS CONTRACT. INFORMATION ON THE WINDOW FORM OVERRIDES ANY CONTRARY PROVISIONS IN THE CONTRACT OF SALE.

The front and back of this Agreement and any documents incorporated herein comprise the entire agreement affecting this purchase and no other agreement or understanding of any nature concerning same has been made or entered into, or will be recognized. I have read the terms and conditions printed on the back hereof and agree to them as a part of this Agreement the same as if it were printed above my signature. I certify that I am at least 18 years old, and hereby acknowledge receipt of a copy of this Agreement. THIS ORDER IS NOT VALID UNLESS SIGNED AND ACCEPTED BY DEALER OR HIS AUTHORIZED REPRESENTATIVE.

APPROVED: _____ DEALER OR AUTHORIZED REPRESENTATIVE
SIGNED: _____ ACCEPTED BY PURCHASER
DATE: 01/27/2005

1000 WEST WINDY LANE
 WINDY, FLORIDA 32558-5359
 WORK OVER PHONE
 Customer Copy

RECEIVED

Page 1
 Time 10:24:10

FEB 24 2005

Id. 1W050751
 2/19/05

UTILITIES, INC. OF FLORIDA
 1200 WEATHERSFIELD AVENUE
 ALTAMONTE SPRINGS, FL
 32714

Unit License
 Reading In 0 PC# LEAH BRISH
 Arrival 2/17/05 at 11:07
 Delivery 0:00/00 Reading
 Gvw Terms A/R Charge
 SW4 022

VIN#

BLANK 12610
 (407) 869-1719

 * PLEASE * ATTENTION: an * ATTENTION TRUCK * DAILY STORAGE *
 * REMIT * JSHA approved * OWNER'S, review * FEES begin 21 *
 * FROM * BACK-UP ALARM * The U.S. D.O.T. * days after inv. *
 * THIS * installed for * Motor Carrier * side date on *
 * INVOICE. * an additional * Safety * any units left *
 * NO * cost of \$60.00 * Regulations * un-claimed. *
 * STATEMENT * If intereted. * for your own * Vehicles \$15.00 *
 * WILL. * see one of our * protection. * per day; *
 * BE * sales personnel. * Equipment/Bodies *
 * SENT. * * * \$10.00 per day. *

***** WARRANTY POLICY *****
 A: NEW EQUIPMENT, IS AS STATED IN OWNERS MANUAL.
 B: ALL REPAIRS ARE 90 DAYS.
 C: ALL USED EQUIPMENT SOLD "AS IS" UNLESS NOTED OTHERWISE.
 IN ADDITION BTE WILL NOT BE RESPONSIBLE FOR ANYTHING LEFT OVER 60 DAYS
 A COPY OF THIS INV. IS REG'D IN THE EVENT WARRANTY REPAIRS ARE NEEDED.
 ***** MOTOR VEHICLE REPAIR SHOP REGISTRATION RMV-26997 *****
 SALES, SERVICE, & GEN. OFFICE call 407-295-0273, & PARTS 407-298-1570.
 VISIT OUR WEB SITE @ www.bennetttruckequipment.com

S U M M A R Y

Qty	Description	Labor	Parts	Misc.	Total
01	FURNISH AND INSTALL HI	180.00	721.63	.00	901.63
T O T A L S		180.00	721.63	.00	901.63

MISCELLANEOUS SUPPLIES : 10.00
 Sales Tax : 58.61

*** PAY THIS AMOUNT ***

Customer Total

960.24
BS 3/1/05

*#0874
 Daniel Anderson
 Pen n brake*

*furnish & installed
 hitch & tool boxes*

107-295-0273