

RECEIVED-FPSC

07 AUG 21 PM 3:11

COMMISSION
CLERK

DOCKET NO.: 060368-WS - Application for increase in water and wastewater rates in Alachua, Brevard, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia and Washington Counties by Aqua Utilities Florida, Inc.

WITNESS: Direct Testimony of Paul J. Morrison,
Appearing on Behalf of the Staff of the Florida Public Service Commission.

DATE FILED: August 21, 2007

CMP _____
 COM 5 _____
 CTR 7 _____
 ECR _____
 GCL _____
 OPC _____
 RCA _____
 SCR _____
 SGA _____
 SEC _____
 OTH _____

DOCUMENT NUMBER-DATE

07414 AUG 21 07

FPSC-COMMISSION CLERK

DIRECT TESTIMONY OF PAUL J. MORRISON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

- Q. Please state your name and business address.
- A. Paul J. Morrison, Florida Department of Environmental Protection, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803.
- Q. Please state a brief description of your educational background and experience.
- A. I received a B.S. Degree in Biology from Florida State University in 1972. From 1972 to 1984, I worked for the Orange County Health Department in the Environmental Health Section. I was involved with the regulation of drinking water systems, restaurants, grocery stores, food processors, public swimming pools and bathing beaches, health facilities, septic tanks, mobile home parks, rabies control, and environmental nuisance complaints. From 1984 to present, I have been working for the Florida Department of Environmental Protection with the regulation of solid and industrial waste facility enforcement (1986 and 1987) and with the regulation of public drinking water systems in the compliance and enforcement section (1984, 1985 and 1988 to present).
- Q. By whom are you presently employed?
- A. Florida Department of Environmental Protection (FDEP)
- Q. How long have you been employed with the FDEP and in what capacity?
- A. I have been employed with the FDEP since 1984 (22+ years). I am an Environmental Manager, involved with public drinking water systems monitoring compliance and enforcement.
- Q. What are your general responsibilities at the FDEP?
- A. As an Environmental Manager, I supervise the public drinking water monitoring compliance and enforcement section. This involves notifying systems of monitoring requirements, reviewing monitoring results submitted by water systems to determine if the results are in compliance with established rule standards, notifying systems when corrective action is

1 necessary because of unsatisfactory results, entering monitoring results into the computer
2 database, issuing and rescinding Boil Water Notices when appropriate, reviewing water
3 system malfunction reports, taking appropriate enforcement action against systems not in
4 compliance with the monitoring rules, and taking and referring drinking water complaints to
5 the appropriate County Health Department (DOH) for investigation under the DOH-FDEP
6 Interagency Agreement.

7 Q. Are you familiar with Aqua Utilities Florida, Inc. (utility) water systems in Brevard, Lake,
8 Marion, Orange, Seminole, and Volusia Counties, particularly the water treatment systems in
9 Brevard County, including Kingswood and Oakwood, the water treatment systems in Lake
10 County, including 48 Estates, Carlton Village, East Lake Harris, Fern Terrace, Friendly
11 Center, Grand Terrace, Haines Creek, Hobby Hills, Holiday Haven, Imperial Terrace, Kings
12 Cove, Morningview, Palms MHP, Picciola Island, Piney Woods/Spring Lake, Quail Ridge,
13 Ravenswood, Silver Lake Estates, Skycrest, Stone Mountain, Summit Chase, Valencia
14 Terrace, Venetian Village, and Western Shores, the water treatment systems in Marion
15 County, including 49th Street, Belleair, Belleview Hills Estates, Belleview Hills, Chappell
16 Hills, Fairfax Hills, Hawks Point, Marion Hills, Ocala Oaks, West View, Woodberry Forest,
17 and the Tangerine water treatment system in Orange County, the water treatment systems in
18 Seminole County, including Chuluota and Harmony Homes?

19 A. Yes, for the monitoring I am familiar with these systems.

20 Q. Could you cite the FDEP rule on boil water notice and explain how that process works?

21 A. Yes. On the subject of boil water notices (bwn), the Florida Public Service Commission staff
22 has advised me several customers spoke at the service hearing for Tangerine in Orange
23 County and Morningview in Lake County that while they got notice to boil water from Aqua,
24 they did not receive notice that the bwn was lifted. Bwn are always required when the water
25

1 pressure is zero in the distribution system. As required by Rule 62-555.350(10), Florida
 2 Administrative Code (F.A.C.), FDEP was notified promptly on each occasion as noted below
 3 and a public notification of a boil water advisory was issued [in accordance with Rule 62-
 4 555.350(11), F.A.C., and the Florida Department of Health's "Guidelines for the Issuance of
 5 Precautionary Boil Water Notices" (revised on 12-11-06) and adopted in Rule 62-555.335,
 6 F.A.C.] by the method indicated below. After satisfactorily correcting the problem that caused
 7 the bwn to be issued and after bacteriological testing for two consecutive days with
 8 satisfactory results, the bwn were rescinded by the method and on the date indicated below.
 9 In 2006, Tangerine had no bwn issued or reported to FDEP. In 2007, Tangerine had three
 10 bwns issued all due to zero water pressure in the distribution system.

<u>Date bwn issued</u>	<u>Date bwn rescinded</u>	<u>Method bwn was issued and rescinded</u>
1-10-07	1-15-07	Door tags on affected residences
6-14-07	6-19-07	Local television and radio stations
6-21-07	6-25-07	Local television and radio stations

15 In 2006, Morningview had no bwn issued or reported to FDEP. In 2007, Morningview had
 16 two bwns issued all due to zero water pressure in the distribution system.

<u>Date bwn issued</u>	<u>Date bwn rescinded</u>	<u>Method bwn was issued and rescinded</u>
3-6-07	3-8-07	Door tags on affected residences
6-9-07	6-21-07	Door tags on affected residences

20 Q. Have the boil water notices been lifted for Tangerine and Morningview?

21 A. Yes. All boil water notices for those two systems have been lifted.

22 Q. Does the utility maintain the required 20 psi minimum pressure throughout the distribution
 23 system?

24 A. Yes. There were no valid low water pressure complaints in 2005, 2006 and to date in 2007.

1 Q. Does the finished water produced by the utility meet the State and Federal maximum
2 contaminant levels for primary and secondary water quality standards?

3 A. Yes, except for the following instances:

- 4 1. In October 2005, the Holiday Haven water system had a bacteriological maximum
5 contaminant level (MCL) violation. On October 4, 2005, both distribution samples were
6 "total coliform" positive. All six repeat samples collected on October 10, 2005, were
7 satisfactory and the five required distribution samples in November 2005, were all
8 satisfactory. If more than one distribution sample is unsatisfactory in a month that is a
9 bacteriological MCL violation. The required public notice to customers was done on
10 November 21, 2005, in the newspaper and by mail. This system has had no unsatisfactory
11 bacteriological distribution samples since October 2005 and the system samples monthly.
- 12 2. In November 2005, the Hawks Point water system had a bacteriological maximum
13 contaminant level (MCL) violation. On November 2, 2005, both distribution samples were
14 "total coliform" positive. All six repeat samples collected on November 7, 2005, were
15 satisfactory and the five required distribution samples in December 2005 were all satisfactory.
16 If more than one distribution sample is unsatisfactory in a month that is a bacteriological MCL
17 violation. The required public notice to customers was done in November 2005, in the
18 newspaper and by mail. This system has had no unsatisfactory bacteriological distribution
19 samples since November 2005 and the system samples monthly.
- 20 3. Beginning in the first quarter of 2006 until the present time, the Chuluota Water
21 System has a violation because the maximum contaminant level (MCL) of 80 micrograms per
22 liter (ug/L) is exceeded for the Total Trihalomethanes (TTHM).

23 Q. Does this include the lead and copper rule?

24 A. Yes.

25

1 Q. Has the utility's compliance with the lead and copper rule resulted in a lessening of the
2 monitoring requirements?

3 A. The Ocala Oaks Subdivision was on reduced three-year monitoring due in 2006, but failed to
4 sample in June-September, 2006. Therefore, this system was required to sample in June 2007
5 which was done on June 12 and 13, 2007, and the results were satisfactory. This system will
6 now remain on reduced three-year monitoring. All other systems are currently on reduced
7 three-year monitoring for lead and copper.

8 Q. Does the utility monitor for the inorganic contaminants listed in Section 62-550.513, Florida
9 Administrative Code, volatile organic contaminants (VOCs) listed in Section 62-550.515,
10 Florida Administrative Code, synthetic organic contaminants (SOCs) listed in Section 62-
11 550.516, Florida Administrative Code, and all other compounds listed in Section 62-550,
12 Florida Administrative Code?

13 A. Yes, except for three systems which are consecutive water systems (Kingswood, Oakwood
14 and Holiday Haven). Consecutive systems must test only for: 1) asbestos every nine years if
15 they have cement asbestos pipe (Kingswood and Oakwood do, Holiday Haven does not have
16 this type pipe); 2) distribution bacteria samples; and 3) lead and copper. The SOC dioxin has
17 a statewide waiver for monitoring unless the water system is a surface water system or is a
18 system that has been determined to be under the direct influence of surface water. These 37
19 systems that must monitor for SOC are neither of those.

20 Q. Do recent chemical analyses of raw and finished water, when compared to FDEP regulations,
21 suggest the need for additional treatment?

22 A. No, except for the following two systems:

- 23 1. Chuluota Water System – This system exceeds the MCL for TTHM, and therefore,
24 needs additional treatment to meet the TTHM MCL. This system is currently under an

1 enforcement Consent Order effective January 10, 2007, to correct this MCL violation.

2 2. Valencia Terrace Subdivision – In a letter dated September 11, 2006, FDEP notified
3 the system owner that well #1 was considered to be “susceptible to microbial contamination.”
4 This was based on numerous total coliform – positive bacteriological results during 2005 and
5 2006 for well #1 and also based on an unsatisfactory 20-sample bacteriological well survey for
6 well #1 in January 2006. When a well is considered to be “susceptible to microbial
7 contamination,” the water system shall provide treatment that reliably achieves at least 4-log
8 inactivation or removal of viruses as stated in FDEP’s September 11, 2006 letter. (EX__
9 PJM-1) To date, the system owners have not proven to FDEP that the system already meets 4-
10 log, and have also not submitted a corrective action proposal in the form of an application to
11 modify the water treatment plant to achieve at least 4-log inactivation or removal of viruses.

12 Q. Has the utility been the subject of any FDEP enforcement action within the past two years?

13 A. Yes.

14 1. Morningview Subdivision – failed to monitor for the primary inorganic contaminants
15 and the secondary contaminants for calendar year 2006. See attached warning letter dated
16 March 28, 2007, and Consent Order dated May 18, 2007, and case closure letter dated June 7,
17 2007. The system did monitor for primaries and secondaries on January 30, 2007, and the
18 results were satisfactory. (EX__ PJM-2)

19 2. Chuluota – which is discussed in Witness Kim Dodson’s testimony.

20 Q. Do you have anything further to add?

21 A. No, I do not.

22
23
24
25

PAUL J. MORRISON
EXH. _ 1



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Colleen M. Castile
Secretary

Mr. Jack Linvarcik, President
Aqua Utilities Florida, Inc.
1100 Thomas Avenue
Leesburg, FL 34748

OCD-PW-CE-06-1019

Lake County - PW
Valencia Terrace Subdivision
PWS ID Number 3351421
4-Log Virus Removal/Inactivation

Dear Mr. Linvarcik:

Department records indicate that the well #1 for the water system at the above-reference facility had more than two total coliform-positive bacteriological results during a 12-month period previously. Therefore, the Department notified you in writing (on the bacteriological laboratory report) to disinfect the well and complete a 20-sample bacteriological survey of the well.

Our records indicate the well was disinfected and the well survey was completed in January 2006 and four out of four samples were unsatisfactory and the well survey was discontinued. Therefore, in accordance with Rule 62-555.315(6)(b) 2, *Florida Administrative Code (F.A.C.)*, if more than 10 percent of the samples, or either of the last two samples, during a 20-sample bacteriological survey of the well are positive for total coliform, the well is considered to be "susceptible to microbial contamination." In accordance with Rules 62-555.315 (6) (b) 2 and 62-555.320 (12) (b), F.A.C., if a well is considered susceptible to microbial contamination, the water system shall provide treatment that reliably achieves at least 4-log inactivation or removal of viruses.

Within 45 days of the date of this letter, you need to have an engineer, registered in the State of Florida, submit a corrective action proposal in the form of an application modifying the water treatment plant to achieve at least 4-log inactivation or removal of viruses, or, have that engineer submit calculations and materials to demonstrate that your water system already meets a 4-log inactivation or removal of viruses.

You are advised that operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 403.141 and 403.162, *Florida Statutes*.

You are requested to contact Mr. Richard Lott, P.E., of this office at (407) 893-3325 within 24 hours of receipt of this letter to schedule a meeting to discuss the issues raised herein, and to determine a corrective plan of action. It is recommended that your engineer be present at this meeting.

Jack Uhvarcik
OCD-PW-CE-06-1019
Page 2

The Department considers the above deficiency to be most serious and asks that you pay immediate attention to this matter.

Sincerely,



Richard S. Lotz, P.G., P.E.
Manager, Drinking Water Program

9.11.06

Date

RSL/jeng

cc: Lake County Health Department
Brian Heath & Jerry Connolly, Designated rep./Facility contact | FAX: (352) 787-6333
Frank Hutner, DEP Drinking Water Permitting
Paul J. Morrison, DEP Drinking Water Compliance/Enforcement
Kim M. Dodson, DEP Drinking Water Compliance/Enforcement
Echo Goodner, DEP Drinking Water Compliance/Enforcement

PAUL J. MORRISON
EXH. _ 2

Ferraro 6/8



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeb Kautkamp
Lt. Governor

Michael W. Sole
Secretary

Mr. Jack Lihvarcik
Aqua Utilities Florida Inc.
1100 Thomas Avenue
Leesburg, Florida 34748

OCD-PW-CE-07-0652

Lake County - PW
Morningview Subdivision
Consent Order - OGC Case No. 07-0787
Case Closure

Dear Mr. Lihvarcik:

Department records indicate that the above-referenced Consent Order requirements have been completed and total payment has been received. Therefore, this enforcement case is closed by this office effective May 29, 2007.

Thank you for your cooperation. You may contact Ms. Shelley Locklear at (407) 894-7555, extension 2249, should you have any further questions.

Sincerely,

for
Christianne C. Ferraro, P.E.
Program Administrator
Water Resource Management

17.073



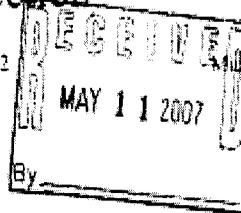
Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kotkamp
Lt. Governor

Michael W. Sole
Secretary



CERTIFIED MAIL
7099 3400 0010 5323 6101

RECEIVED
MAY 16 2007

DEP Central Dist.

OCD-PW-CE-07-0492

Mr. Jack Lihvarcik
Aqua Utilities Florida Inc.
1100 Thomas Avenue
Leesburg, FL 34748

**SUBJECT: Proposed Settlement of Morningview Subdivision
Consent Order - OGC File No. 07-0787.**

Dear Mr. Lihvarcik:

The purpose of this letter is to complete the resolution of the matter previously identified by the Department in the Warning Letter OWL-PW-07-0004 dated March 28, 2007, a copy of which is attached.

The corrective actions required to bring the water system at your facility into compliance have been performed. The Department finds that you are in violation of the rules and statutes cited in the attached Warning Letter. In order to resolve the matter identified in the Warning Letter, you are assessed civil penalties in the amount of \$2,000, along with \$250 to reimburse the Department costs, for a total of **\$2,250**.

The civil penalties are apportioned as follows: \$1,000 for violation of Section 403.161(1)(b), Florida Statutes, and Rule 62-560.513, Florida Administrative Code; and \$1,000 for violation of Rule 62-550.520, Florida Administrative Code.

The Department acknowledges that the payment of these civil penalties by you does not constitute an admission of liability. This payment must be made payable to the Department of Environmental Protection by cashier's check or money order, and shall include the OGC File Number assigned above and the notation "Ecosystems Management and Restoration Trust Fund". Payment shall be sent to the Department of Environmental Protection, Central District Office, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767, within 60 days of your signing this letter.

Your signing this letter constitutes your acceptance of the Department's offer to resolve this matter on these terms. If you elect to sign this letter, please return it to the Department at the address indicated above. The Department will then countersign the letter and file it with the Clerk of the Department. When the signed letter is filed with the Clerk, the letter shall constitute final agency action of the Department which shall be enforceable pursuant to Sections 120.69 and 403.121, Florida Statutes.

Mr. Jack Lihvarcik/ Aqua Utilities Florida, Inc.
OGC File No. 07-0787
Page 2

If you do not sign and return this letter to the Department at the District address above *within 20 days* of receipt, the Department will assume that you are not interested in settling this matter on the above-described terms, and will proceed accordingly. None of your rights or substantial interests are determined by this letter unless you sign it and it is filed with the Department Clerk.

Sincerely,

May 9, 2007
Date

Vivian F. Garfein
Vivian F. Garfein
Director, Central District

FOR THE RESPONDENT:

I, Jack Lihvarcik, President of Aqua Utilities Florida Inc., HEREBY ACCEPT THE TERMS OF THE SETTLEMENT OFFER IDENTIFIED ABOVE.

By: *Jack Lihvarcik*

Date: May 15, 2007

FOR DEPARTMENT USE ONLY

ENTERED into this 18th day of May, 2007, in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Christanne C. Fenwick, PE
Vivian F. Garfein
Director, Central District

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Tina Young 05/18/2007
Clerk Date

VFG:sjl
Attachments *3/1*

Copies furnished to: Shelley Locklear, DEP Drinking Water Compliance/Enforcement
Mare Carrasquillo, DEP Drinking Water Compliance

Witnessed by: Scott G. M. ...

NOTICE OF RIGHTS

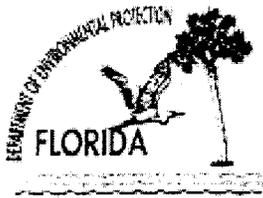
Persons who are not parties to this Consent Order but whose substantial interests are affected by this Consent Order have a right, pursuant to Sections 120.569 and 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the District Office named above at the address indicated. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes.

The petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner; the Department's Consent Order identification number and the county in which the subject matter or activity is located;
- (b) A statement of how and when each petitioner received notice of the Consent Order;
- (c) A statement of how each petitioner's substantial interests are affected by the Consent Order;
- (d) A statement of the material facts disputed by petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Consent Order;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Consent Order;
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Consent Order.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject Consent Order have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

RECEIVED

MAY 16 2007

DEP Central Dist.

CERTIFIED MAIL
7099 3400 0009 6126 8341

Mr. Jack Lihvarcik
Aqua Utilities Florida Inc.
1100 Thomas Avenue
Leesburg, FL 34748

WARNING LETTER
OWL-PW-07-0004

Lake County - PW
Morningview Subdivision
PWS ID Number 3350852
Compliance Monitoring Requirements

Dear Mr. Lihvarcik:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter.

A review of Department records for the above-referenced community public water system indicates that a violation of Florida Statutes and rules may exist at this facility. Department records indicate the following:

1. Compliance monitoring for **Primary Inorganic Contaminants** was not conducted for calendar year 2006.
2. Compliance monitoring for **Secondary Contaminants** was not conducted for calendar year 2006.
3. Public notification may not have been accomplished as required in Rule 62-560.410, Florida Administrative Code. The supplier of water must notify all those persons served by the subject system of its failure to comply with those rules that apply to the deficiencies in Items #1 and #2 above. A copy of such notice must also be provided to this office.

It is a violation for *any person* to fail to comply with the following statutes and rules:

Section 403.16(1)(b), Florida Statutes - Failure to comply with any rule or regulation adopted or issued by the Department.

Rule 62-550.513, Florida Administrative Code - Primary Inorganic Contaminants Monitoring Requirements.

Rule 62-550.520, Florida Administrative Code - Secondary Contaminants Monitoring Requirements.

Section 403.857, Florida Statutes, and Rule 62-560.410(3)(a), Florida Administrative Code - Public notification requirements.

This document is a copy of the original document.
It is not a certified copy.

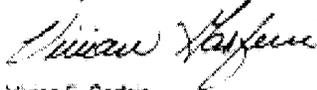
WARNING LETTER
OWL-PW-07-0004

You are advised that operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 403.141 and 403.161, Florida Statutes.

You are requested to contact **Shelley Locklear** at **(407) 894-7555, extension 2249, within 15 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,



Vivian F. Garlein
MF Director, Central District

March 28, 2007
Date

VFG sjl  RJL

cc: Lake County Health Department
Shelley Locklear, DEP Drinking Water Compliance/Enforcement
Marie Carrasquillo, DEP Drinking Water Compliance

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for increase in water and wastewater rates in Alachua, Brevard, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.

DOCKET NO. 060368-WS

DATED: AUGUST 21, 2007

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the DIRECT TESTIMONY OF PAUL J. MORRISON has been served by U.S. Mail to Kenneth A. Hoffman and Marsha E. Rule, Esquires, Rutledge, Ecenia, Purnell & Hoffman, P. A., P.O. Box 551, Tallahassee, FL 32302-0551, on behalf of AQUA UTILITIES FLORIDA, INC., and that a true and correct copy thereof has been furnished to the following by U. S. Mail, this 21st day of August, 2007:

Stephen Burgess & Stephen Reilly, Esquires
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Cecilia Bradley, Esquire
Office of the Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050



ROSANNE GERVASI
SENIOR ATTORNEY
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6224