BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Hardee, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.	)	DOCKET NO. 100330-WS Dated: August 10, 2011

DIRECT TESTIMONY

OF

SUSAN CHAMBERS

on behalf of

Aqua Utilities Florida, Inc.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

AQUA UTILITIES FLORIDA, INC.

TESTIMONY OF SUSAN CHAMBERS

DOCKET NO. 100330-WS

I. Introduction.

Q. Please state your name, position, and business address.

A. My name is Susan Chambers. I am the National Customer Service Manager for Aqua America ("Aqua"). My business address is 762 W. Lancaster Avenue, Bryn Mawr, Pennsylvania 19010.

Q. What are your duties and responsibilities as the National Customer Service Manager?

A. I am responsible for serving the customers of Aqua Utilities Florida, Inc. ("AUF" or the "Company") in the areas of customer service and Call Center operations, including quality control.

Q. Please describe your educational background and work expertise.

A. I have worked for Aqua for 24 years. I have recently been appointed to the position of National Customer Service Manager. Prior to this appointment, I was the National Customer Billing Manager and took on that role in 2005. Prior to that, I have held several positions in Aqua's billing and accounting departments and became Aqua's billing manager in 2001. I have a B.S. degree in Accounting from Cabrini College in Radnor, Pennsylvania.

II. Purpose and Summary of Testimony.

Q. What is the purpose of your testimony?

A. I appear on behalf of AUF to discuss the Company's good customer service and its strategy for continuing to enhance customer service. I also discuss the Company's continuing commitment to address customer satisfaction.

Q. Are you sponsoring any exhibits to your direct testimony?

A. Yes. I am sponsoring the following exhibits:

Exhibit SC-1 - is a compilation of AUF's actions taken in response to customer comments made during prior hearings in this proceeding.

Exhibit SC-2 - is AUF's detailed response to issues raised by a customer receiving service from AUF's Arredondo Farms system.

Exhibit SC-3 - is AUF's Final Phase II Quality of Service Monitoring Report.

Exhibit SC-4 - is AUF's Report on Commission Complaints - 2011.

Exhibit SC-5 - is AUF's Report on Commission Complaints - 2009-2010.

Q. Please summarize your testimony.

A. AUF has a strong commitment to customer service. The Company is dedicated to anticipating and meeting the needs of its customers by effectively utilizing customer service representatives ("CSRs"), field technicians, and technology to enhance the quality of the service that AUF provides to its customers. AUF continues to listen attentively to the concerns of its customers and has implemented a number of significant proactive measures to address customer satisfaction.

Since AUF's last rate case in Docket No. 080121-WS, AUF's customer service has been the focus of a rigorous and unprecedented monitoring review by the Commission, its Staff and the Office of Public Counsel ("OPC"). The results of that monitoring clearly show that AUF has good customer service and is committed to improving that service. No further action by the Commission is needed to ensure quality of service.

III. AUF's Commitment to Customer Service.

Q. Please describe AUF's commitment to customer service.

A. AUF's mission is built around a strong commitment to customer service. We have a Customer Field Services Manager in Florida who manages all customer service functions between the Call Center, Billing and Customer Service. This includes service orders, billing issues, water quality issues, meter reading and customer interface. We have a Call Center dedicated to AUF-related calls, and we are committed to making sure that our CSRs are well trained to respond to customers in an effective, prompt and courteous manner.

Q. Has AUF taken steps since its last rate case to enhance the services it provides to customers?

A. Yes. Since the last rate case, AUF has implemented a number of proactive measures to improve its customer service. For example:

- To identify trends or potential problem areas, and to appropriately resolve customer concerns, AUF has formed a "Complaint Analysis and Remediation Team" ("CART"), which consists of all Call Center

supervisors and their managers, as well as the Supervisor of Compliance. The team meets on a monthly basis to address all escalated calls and to identify areas where further coaching and training are needed. When I use the terms "escalated calls" I refer to calls and communications received from customers requesting further review by either a supervisor or manager.

- AUF has refined the tracking of customer on-site meter and bench test procedures to make those tests more timely and efficient.
- To enhance customer responsiveness and efficiency, AUF has standardized its processes for its field technicians to improve the interactions between the field technicians and the Call Center.
- AUF prepared and provided an informational brochure to remind customers about contacting the Call Center when they leave or return to their Florida home. This proactive measure is helpful because many of AUF's customers use their Florida home as a second residence in the winter. The brochure was designed to encourage customers to contact the Call Center when they leave for the summer so that their account is properly noted as "seasonal."
- AUF developed a water conservation and leak detection informational section on the website. This can be found at http://watersmart.aquaamerica.com.

These are just some of the measures AUF has taken since the last rate case to improve its customer service. AUF is constantly looking for ways to enhance customer satisfaction.

Q. Has AUF attempted to address proactively customer concerns raised at the customer meetings that previously took place in this proceeding?

A. Yes. Between October 14, 2010, and November 18, 2010, AUF attended and participated in 9 customer meetings, at which time the customers were allowed to ask questions and provide input regarding AUF's quality of service. AUF listened attentively to all of those customer comments. AUF customer representatives reviewed every single issue raised during the public input hearings. Depending on the nature of the issue, AUF followed up with meetings, phone calls, meter tests, field visits and follow-up letters. In addition, AUF filed with the Commission a formal response to the customer comments from each of the meetings and from the May 24, 2011 Agenda Conference. Attached to my testimony as Exhibit SC-1 is a compilation of all of AUF's responses to the customer comments, which AUF has previously filed with the Commission.

Q. Has AUF attempted to proactively address customer concerns raised in other forums?

A. Yes. AUF filed a detailed response to concerns raised by a customer receiving service from AUF's Arrendondo Farms system, which is attached to my testimony as Exhibit SC-2. In addition, AUF has contacted this customer and will be meeting with the customer in the near future to discuss specific issues which the customer has raised.

Q. What other steps has AUF taken to address customer concerns?

A. Customer input is extremely important to AUF and the Company continues to take steps to address issues raised by customers at customer meetings. For

example:

- AUF has taken significant steps to address customer concerns with respect to the aesthetic quality of water. This is explained in detail in Mr. Luitweiler's direct testimony,
- Furthermore, in order to address customer requests for online payment options, AUF has developed a new program - Aqua Online - that allows utility customers to view and pay bills online. This new program is currently available to AUF's customers.
- AUF listened attentively to those customers who expressed concerns that their water service had been "shut off" for nonpayment. AUF is sensitive to these concerns and has a termination of service policy that is more consumer friendly than the service termination regulations set forth in Commission Rule 25-30.320(2), F.A.C.

Q. Please compare AUF's service termination policies with those set forth in the Commission's Rules.

A. Under the Commission's Rules, a customer has 21 days to make a payment before being considered delinquent. Once an account becomes delinquent, those rules authorize the utility to terminate service for nonpayment for <u>any</u> amount past due, provided that the utility supplies the customer with at least 5 working days written notice in advance of termination. Under AUF's policy, the customer is provided at least 10 days advance written notice indicating that service will be discontinued if payment is not received. In addition to providing more advanced written

shutoff notice, AUF also attempts to call the customer prior to discontinuing service, which is not required by the Commission's Rules. Furthermore, unlike the Commission's Rules which allow for service to be terminated for failure to pay any amount of an outstanding bill, AUF's policy is to proceed with service termination only in those instances where the outstanding amount owed exceeds $100. Furthermore, although not required by Commission Rules, AUF routinely offers a payment plan for outstanding bills for qualified customers. Qualified customers are customers who have not broken previous payment agreements more than twice. Finally, where service is terminated for failure to pay, AUF's policy is to reinstate service within the next business day following the date of payment confirmation.

Q. Other than customer service meetings, are there other means by which the Company measures and monitors the quality of its customer service?

A. Yes, AUF closely monitors the types of calls coming into its Call Center as well as the complaints filed at the Commission. AUF also utilizes its own quality of service metrics which are part of its robust quality assurance program.

Q. Please provide examples of changes that were implemented as a result of the Company monitoring calls coming into its Call Center.

A. Certainly. Since the last rate case, AUF has implemented a process where an alert message is placed on a customer bill if a customer has a high bill or the bill covers a period longer than 35 days. The high bill alert prompts the customer to investigate for potential leaks and visit Aqua's website for more detailed

information. The long period bill alert advises the customer that they can request a payment arrangement upon contacting the Call Center.

In addition, in order to improve the CSR responsiveness and make sure that escalated calls coming into the Call Center are responded to in a timely fashion, AUF has developed an electronic work queue ("EWQ") that is used to monitor and track supervisor customer call backs. The EWQ is audited by the Quality Assurance Team, which is compromised of Senior CSRs.

Q. Please explain how AUF monitors the complaints filed with the Commission in order to ensure quality of service.

A. AUF closely monitors the complaints coming into the Commission and categorizes the complaints in order to track and respond to root cause trends. For the first seven months of 2011 AUF averaged 10 complaints per month. By comparison, the average number of complaints filed regarding AUF in 2009 and 2010 were 18 per month and 13 per month, respectively. This is shown in my Exhibit SC-5. As shown in my Exhibit SC-4, 56 out of 71 (79%) complaints in 2011 were related to a high bill or billing dispute.

AUF has acted promptly and properly to resolve the complaints filed at the Commission's Call Center. Indeed, all of the complaints filed during the Phase II monitoring period have now been closed.

Q. Have you identified any trends in the volume of complaints that have been filed regarding AUF since 2007?

A. Yes. In 2007 AUF averaged receiving 20 Commission complaints per month. In 2011, that average has dropped to 10 complaints per month, which equates to a 50% reduction in complaint volume. This decrease in complaints during this period is significant, particularly when one considers that over the same time frame AUF had initiated two rate cases, and customer complaints and inquiries typically increase around the time of a rate case. Although AUF is proud that the number of complaints has decreased over the last 4 years, AUF recognizes the importance of tracking formal complaints and will work hard to see the number of complaints continue to decrease even further.

Q. You mentioned that AUF measures and monitors its service quality using its own metrics. Why doesn't AUF use the Commission's metrics?

A. The Commission has not adopted its own standards to monitor or measure a water or wastewater utility's quality of service.

Q. How does AUF employ its metrics to monitor and measure quality of service?

A. AUF has been proactive in establishing its own quality of service metrics as part of a robust quality assurance program. A detailed discussion of those quality of service metrics and how AUF utilizes those metrics to improve service and address customer satisfaction is set forth in my Exhibit SC-3.

It is important to note that AUF did not establish these self-imposed metrics at easily attained levels so that it could simply justify the status-quo. Instead, AUF designed its metrics to challenge employees to stretch their customer service performance toward excellence. AUF's operations are guided by challenging targets which take into account that, while 100 percent perfection is not always achievable or cost effective, AUF's customers expect 100 percent reliability. AUF strives to provide 100 percent reliable customer service in all service categories. However, as with any water, gas, electric or telecommunications utility, 100 percent perfection is not always attainable. The fact that AUF has been proactive in adopting its own quality of service metrics, illustrates AUF's commitment to quality of service. Moreover, as shown in Exhibit SC-3, the results of those quality of service metrics demonstrate that AUF's service quality has steadily improved since its last rate case.

Q. You state that the quality of AUF's customer service has been the subject of rigorous monitoring by the Commission and others since the last rate case. Can you elaborate on that monitoring process?

A. Yes. AUF last sought rate relief from the Commission in 2008. After conducting a formal hearing, the Commission determined that AUF's quality of service was marginal for all systems except the Chuluota System, which was found to be unsatisfactory. The Commission thereafter granted AUF rate relief for all of its systems, except for the Chuluota water and wastewater systems. In addition to granting rate relief, the Commission established a monitoring plan ("Initial Monitoring Plan") to enable it to monitor AUF's customer service in three areas: the general handling of customer complaints, the specific handling of complaints

at AUF's Call Center, and the accuracy of AUF's metering readings and resulting bills.

Initial Monitoring Phase

The Commission's Initial Monitoring Plan required AUF to file monthly reports on customer complaints, Call Center sound recordings, and meter reading logs and route schedules for the six-month period from May 2009 through October 2009. Every call from an AUF customer that came into the Call Center during this time period was recorded and provided to the Commission Staff for review. AUF complied with the Commission's Initial Monitoring Plan in all respects. AUF timely submitted extensive complaint logs and Call Center sound recordings for each month, which allowed Commission Staff to objectively review first-hand all customer calls to determine the quality of service provided by AUF's CSRs. AUF also provided Commission Staff with all of its meter reading route schedules for the entire six month monitoring period along with the actual meter reading logs for all of those systems. This allowed Commission Staff to personally visit AUF systems soon after AUF's meter readers had completed their reads and documented the usage on the meter. Commission Staff compared its volumetric reads to the AUF meter reading log to independently test for meter and billing accuracy.

At the end of that intensive independent review process, Commission Staff filed a detailed report and recommendation on March 4, 2010, which concluded that AUF's handling of customer complaints, meter reading, customer billing and environmental compliance was adequate.

On March 16, 2010, the Commission considered Staff's recommendation and observed that its Staff had spent an extraordinary amount of time objectively reviewing the quality of AUF's customer service and further found that Staff's review of the actual CSR sound recordings was the most reasonable means to determine if AUF is performing adequately. The Commission went on to affirm that of the 738 total sound recordings reviewed, its Staff had independently determined that "the majority were handled in a courteous and professional manner and the representatives were taking the appropriate action to resolve all issues in the call." Order No. PSC-10-0218-PAA WS (April 6, 2010) at p. 6. The Commission also acknowledged that AUF had implemented a number of other measures to improve its customer service with respect to its Call Center, its field technicians and its customer outreach.

The Commission ultimately concluded that the results of the Initial Monitoring Plan showed "**substantial improvement in AUF's customer service**, [but that] additional monitoring was required to ultimately render a determination as to the adequacy of AUF's quality of service." *Id.* at 12 (emphasis added).

Phase II of Monitoring

Recognizing that its Initial Monitoring Plan had imposed substantial cost and time requirements on utility Staff and Commission Staff, the Commission directed its Staff to continue to monitor AUF's customer service through the end of 2010 on a more limited basis. The Commission also ordered AUF to collaborate with the OPC and other parties to "develop a cost-effective, efficient, and meaningful

monitoring plan, and to bring the supplemental monitoring plan to us within 45 days." *Id.* at 13. Thereafter, AUF, OPC and the parties ultimately agreed to a proposed Phase II Monitoring Plan which eliminated the requirements that AUF produce sound recordings, meter reading information, and complaint logs, but continued a more limited monitoring of customer service and certain aesthetic water quality issues. To ensure that this Phase II Monitoring Plan was cost-effective and efficient, the reporting requirements specifically agreed upon by OPC and AUF were structured around (i) non-proprietary reports that AUF was already using internally to monitor and ensure quality of service (with the exception of one report that was created specifically for the Phase II Monitoring Plan), and (ii) an aesthetic water quality improvement program that AUF already had underway.

The Phase II Monitoring Plan required AUF to provide on a monthly basis the following customer service-related reports:

- A Management Quality Performance ("MQP") Report, which tracks on a monthly basis the reasons for customer calls. This report is used by AUF management to understand recent performance and identify any adverse trends.
- A Florida Complaint Support Information Report, which provides non-proprietary information for each of the complaint-related calls that underlies the MQP Report for each month.
- A Florida Scorecard, which includes quality of service metrics for each month and is used by management to incentivize its employees to provide excellent quality of service to customers.

- A Call Center Monitoring Statistics Report, which tracks the key performance indicators of AUF's Call Center on a monthly basis, and is used by AUF management to ascertain whether it is meeting its targeted service performance levels.
- A Call Quality Report for AUF's Call Center, formatted such that monthly data can be tracked for each of the individual call center separately.
- A Service Order Status Report, which tracks AUF's service order log and the timeliness of closing service order requests.
- An Estimated Read Report, which allows for the tracking of the number of estimated reads and the investigating any adverse trends.

By Order No. PSC-10-0297-PAA-WS, dated May 10, 2010 ("Phase II Monitoring Order"), the Commission approved the Phase II Monitoring Plan agreed to by the OPC and AUF. In so ruling, the Commission acknowledged that many of its customer service concerns regarding meter reading, meter accuracy and billing that led to the Initial Monitoring Plan had been addressed. Pursuant to the Commission's directives, AUF filed a final report on February 28, 2011, summarizing the results of AUF's Phase II reporting requirements. *See* Exhibit SC-3.

Q. What did the results of Phase II Monitoring Reports show?

A. The detailed results of the Phase II Monitoring Reports are set forth in AUF's Final Phase II Quality of Service Monitoring Report, which is attached as Exhibit SC-3 to my testimony. The results of that report show that AUF has been proactive in adopting aggressive quality control methods and has done an excellent job in meeting those service quality goals. The results of the Phase II

Monitoring Report also show that AUF has made steady improvement in the quality of customer service since the last rate case. For example, the CSR Call Quality scores improved dramatically when compared to 2008. *See* Exhibit E to Exhibit SC-3. Also, the Estimated Read Report shows that the estimation rate for Florida has been consistently below the target goal of 1 percent. *See* Exhibit G to Exhibit SC-3. This steady improvement is also reflected in the downward trend in complaints filed with the Commission that I previously discussed.

Q. Since the last rate case, have the Commission and its Staff made any findings with respect to the quality of AUF's customer service?

A. Yes. As I mentioned above, the Commission and its Staff have closely monitored the quality of AUF's customer service for over a period of almost two years, and not once has the Commission or its Staff found that the quality of AUF's customer service was unsatisfactory. In fact, as far back as March 4, 2010, Commission Staff found:

> Based on staff's review of AUF's processes for handling customer complaints, meter reading, and customer billing, as well as its environmental compliance, staff recommends that AUF's performance as specified in the Monitoring Plan detailed in the Final Order is adequate.

Staff Recommendation, dated March 4, 2010, in Docket No. 080121-WS, at 13. (emphasis added). Furthermore, when the Commission decided to continue to monitor AUF's quality of service through the end of 2010, it expressly found that "preliminary results show substantial improvement in AUF's customer service." Order No. PSC-10-0218-PAA-WS (April 6,

2010) (emphasis added). More recently, after reviewing AUF's Final Phase II Monitoring Report, Staff found that:

> A comparison of performance data from January 2007 through December 2010 indicates that AAI has improved many of its Call Center performance measures, and generally maintained the improved performance measurements since October 2008. Also, Staff did not note any recurring negative performance trends in the Phase II Reports.

Staff Recommendation, dated May 12, 2011, in Docket No. 100330-WS and 080121-WS, at 32.

Q. What steps has AUF taken to ensure that its employees are efficiently and effectively providing top quality customer service?

A. A CSR's demeanor and tone on a customer call are very important. Our CSRs are often the first point of contact between the customer and the Company. AUF management utilizes the CSR Call Quality Scores Report to evaluate performance in answering customer calls at the Call Center. AUF randomly samples CSR calls and evaluates them on a monthly basis. The evaluation includes the CSR's soft skills such as tone and demeanor, and focuses on whether the CSR has fully satisfied the customer's inquiry.

Q. Have you taken any steps to upgrade the training of the Company's CSRs?

A. Yes. Since the last rate case, the Company has had thirty-five customer service professionals complete the full three-course customer service training program developed by the AWWA for utility company CSRs. Aqua America was the first

utility in the country to have its employees complete the full range of the AWWA's courses demonstrating again our commitment to CSR training and improving customer service.

Q. Does this conclude your direct testimony?

A. Yes.

Aqua Utilities Florida, Inc.
Sunny Hills Customer Meeting Response

Overview: The Sunny Hills customer meeting was held on October 14, 2010, in Sunny Hills, Florida. Approximately 7 customers provided comments to the Commission staff during the meeting.

The majority of the customers gave input regarding the level of the rates and bills.

Two customers provided input concerning the secondary water quality, which pertained to cloudy water. One customer indicated that the cloudy water occurred three years ago. The other indicated it occurred approximately six months ago, but had cleared up.

One customer provided input on service related issues pertaining to a service line break.

One customer inquired as to his high consumption of water.

Two customers provided input on the consumption blocks and inquired as to why customers had to pay more for increased water use.

Ms. Vitale; 1681 Ross Ct

At the meeting, Ms. Vitale raised an issue about a service line break which occurred between the utility's meter and her residence.

Upon researching Ms. Vitale's concern, AUF found that Ms. Vitale first called on January 11, 2010 stating she had a leak. An emergency work order was issued. Ms. Vitale called back requesting to know where her shut off valve was located on her side of the meter. The CSR advised that the location of the shut off valve was unique to each home and such information was not readily available to the CSR. Thereafter, Ms. Vitale ended the call abruptly.

Ms. Vitale again called back to inform the CSR that the fire department had come by and shut her water off. Ms. Vitale requested an adjustment. At this time the CSR cancelled the service order, thus the technician did not receive the work order. The customer was advised that CSR would contact the Florida operations division to research her line break. Again Ms. Vitale hung up on the CSR.

In February 2010, Ms. Vitale called inquiring as to a leak adjustment. She was informed that she needed to fax in the necessary receipts from her plumber showing the repairs had been made. On February 24th, Ms. Vitale called again and was inquiring where her adjustment was. She stated she was never told to provide information and once again,

hung up on the CSR. The CSR notes on the customer's account state that she was advised to provide the documentation of the repair.

Ms. Vitale called back March 11, 2010 to inquire as to her leak adjustment. She was notified that she had received an adjustment of $15.61, which was based on the usage portion of the bill for the month in question $35.80. This was compared to the average usage bill she has received in the past which was $4.58. The difference between the incident and her normal usage was $31.22. AUF's policy is to provide a 50% adjustment which in this case is $15.61 – which she received.

Linda Rollins; 3979 Ambassador:

Mr. Rollins raised an issue concerning high bills and that he cannot understand how he could be using the amount of water billed. AUF representatives visited Mr. Rollins' home after the meeting and explained how to read the meter and also found no leaks. Mr. Rollins was informed that a meter test would be scheduled on the meter to ensure the meter was accurately recording water usage. AUF made several calls to Mr. Rollins with no answer and no return phone calls. Nonetheless, AUF's Area Coordinator conducted an onsite meter test during the week of November 8, 2010.

The meter test was performed. The results were:

Flow rate	his meter	our meter	%
0.50 gpm	10.00	9.95	100.50%
5.00 gpm	10.00	10.13	98.72%
10.00 gpm	10.00	10.13	98.72%
		Average	99.31%

The AUF technician tagged the customer's door with these results and indicated that the meter passed. Further attempts will be made to contact Mr. Rollins and inform him of the test results.

Attached is the requested billing information. You will note, the customer has only been in this home since May of 2010.

Ms. Luzia Mikutis; 1768 Quintara Ct.;

Ms. Mikutis was concerned about the rates and bills. After review of her account, there appears to be no excessive usage. The usage patterns show some "ups and downs" but this would relate to irrigation usage.

Month:	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Monthly Avrge
Usage (gal):	300	800	1100	1000	4700	2500	800	600	1900	800	800	1100	1367
Days:	31	32	31	32	32	27	31	30	30	32	30	32	31
Avrge/day:	10	25	35	31	147	93	26	20	63	25	27	34	45

In 2009, she had an issue that was due to frozen water lines.

She wanted to know if our rates were going up due to a new possible development (Spring Ridge) not going forward. As with all regulated utilities, Aqua has not made any investments related to this speculative development.

Gary Hartman; 2150 Sunny Hills Blvd;

Mr. Hartman expressed concern that the rates are currently too high, which in turn could slow future growth.

Katrina Randolph; 1717 Hemlock Circle;

After the conclusion of the meeting, Ms. Randolph indicated to the Commission staff that she had experienced an outage due to a lightning strike and it took four days to restore service.

After researching Ms. Randolph's concerns, AUF concluded that there had been no lightening strike outages in July 2009 as stated. However, this past summer, AUF conducted work at well #4 that may have resulted in discolored water. Well # 4 was taken out of service for repair and Well #1 maintained pressure throughout the event. AUF technicians worked round the clock to insure adequate pressure was maintained throughout the distribution system. AUF did receive several calls concerning discolored water during the work process. Directional flushing was performed to remedy this. Well # 4 was brought back on line after repairs were completed.

Ms. Marcyan; 4050 Linwood Dr.;

After the conclusion of the meeting, Ms Marcyan expressed concerns to staff about a secondary water quality incident involving discolored water.

The Sunny Hills system is in compliance with all state and federal standards of the Department of Environmental Protection and Environmental Protection Agency.

Upon review of this account, it was discovered that in December 2007 there was a call from this residence concerning discolored water. The AUF technician conducted a site visit and flushed the water line by her house, which we believe remedied the issue.

Our records indicate that, in June 2010 there was another call concerning discolored water. Again, the technician flushed the water line by her house and again the discolored water cleared. The June 2010 situation was due to a line break stirring sediments up in the line. Discolored water complaints typically arise following either line breaks or flushing events.

This was not related to the work on Well #4, since this occurred in July 2009.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

Eustis Customer Meeting Response

Overview: The Eustis customer meeting was held on October 29, 2010. Approximately 25 customers provided comments to the Commission staff during the meeting.

The majority of the customers gave input regarding the level of the rates and bills.

Comments were also made concerning the payment of the base facility charge and the inclining block rate structure approved in the last rate case.

Representative Allen Hayes

Representative Allen Hayes represents Scottish Highlands and cited economic hardships in the area. He also questioned how these systems could be allowed to be run down prior to the acquisition by Aqua.

Cynthia Irwin – 36765 Shadow Hill Drive

Ms. Irwin discussed odor issues with the water system. She indicated that she had contacted Aqua and had someone come out and test the water outside her residence.

Response: In August 2010 AUF visited this site and determined that there was a slight increase in chlorine level. AUF technician thoroughly flushed the main for an extended time and took another test. The test results showed that everything was ok. This customer is located toward the end of a line.

Bob Gruno – 34834 Haines Creek Road

Mr. Gruno discussed that he has received a bill of $200 a couple of years ago and questions the RF meters. In addition he discussed a hole in the rear of his home that is a hazard.

Response: In review of Mr. Gruno's account, there was no period since October 2006 where his monthly bill was greater than $85.00. There seems to be consistent consumption on this account. Several attempts have been made to contact Mr. Gruno by telephone. AUF's technician has inspected the system and residence and has not located any "holes." A door tag has been left to have the customer contact AUF to determine the location of Mr. Gruno's concern.

Mr. Harold Robinson – 1205 Loch Rannoch

Mr. Robinson mentioned that his May bill was for 8,700 gallons. The customer stated he moved in June 2010; however, his move in was May 20, 2010.

Response: In review of his account his consumption was in fact 8,700 gallons. He called Aqua, but wanted to discuss the location of his meter. Mr. Robinson wanted a Utility Tech to visit his property and show him the location of his meter pit so in the event of a leak he had the ability to shut off water to his house. Our Utility Technician did visit the site and showed Mr. Robinson where his meter was located. He did ask about the rates and was informed of the new rate structure and how it impacts his usage given there are step rates now versus in the past.

Mr. Tony Vanderberg – 7072 Earlwood Ave.

Mr. Vanderberg raised concerns with his water which occurred in 2007. Mr. Vanderberg is a customer in the Tangerine water system. In addition he had issue with Aqua inadvertently cutting off the water to the church. Aqua had cut off the wrong line. In addition he has an issue with Aqua's maintaining its water plant, which sits adjacent to the church. He states that Aqua continually drives across the church property.

Response: Aqua previously provided Mr. Vanderberg with instructions to forward information to Aqua to process his claim on his water softener. There are no records that Mr. Vanderberg sent in the required information as requested. Aqua has visited Mr. Vanderberg several times to discuss his water softener concerns. The customer's water softener system is over 15 years old and he was told it needs replacing due to softener pellets which have worn through the filter due to age.

AUF did inadvertently turn off the irrigation water to the church. In July 2009, AUF inadvertently shut down a valve to repair a water line that went through the park. At the time, AUF was unaware that this line also supplied water to the church's irrigation system. AUF reimbursed the church for damages to the landscape.

AUF is installing water main throughout Tangerine eliminating dead ends and undersized water main. Because this being a residential system, the contractor did not have anywhere to store the pipe so it was stored at the water plant. The Contractor did drive across the Church property and at our June meeting with the customers at Tangerine, Mr. Vanderberg mentioned the damage to the grass and he was assured when the construction was completed our Contractor would restore the property.

Tangerine is one of the systems involved in the secondary water project. A sequestering system has been installed and is operational. This system binds the naturally occurring calcium, iron and manganese in the water, which reduces the residue customers might see on dishes and fixtures.

In addition, AUF has recently completed replacement of old water mains and a looping project to address the secondary water concerns. AUF and OPC have met with the customers of Tangerine twice during the secondary water project.

Greg Andes – 25101 Chip Shot Drive Sorrento FL

Mr. Andes raised issues with his water quality. He lives at the last house on a dead end street.

In addition he is requesting "internet payment service".

Response: Mr. Andes lives at the end of a cul-de-sac. Since moving to his residence, AUF has been to Mr. Andes home twice. The first time was July 2009 to address Mr. Andes' concern on fluoride, which Aqua does not add to the water. The second time was August 2009 to address his odor concerns.

This part of the Fairways system has been placed on a Flushing Program that is implemented quarterly. Since the last visit in August 2009, this customer has not called to report any additional odor issues. There appears to be no further issues with this customer or others in the system.

As with regard to internet payment, Aqua is working on providing this service to customers in the future.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

Ft. Myers Customer Meeting Response

Overview: The Ft. Myers customer meeting was held on November 18, 2010. Three customers provided comments to the Commission staff during the meeting.

Steve Brunner – P.O. Box 100, Sanibel

Staff Specific Request:

Mr. Brunner manages eight condo associations. The Commission has been aware for some time of his potable water irrigation and sewer billing concerns. Apparently billing problems still exist concerning "deduct meter." Please give an update of the billing status situations for the associations Mr. Brunner represents.

Response:

Mr. Brunner's concerns are primarily due to the fact there is no "deduct meter" provision in AUF's tariffs. This is a wastewater only system and the water meters are owned by the water provider. If a deduct meter exists at the property, these deduct meters were installed and are owned by the respective associations. AUF does not own any water meters in its South Seas wastewater system.

Mr. Brunner is a new property manager who recently took over for Mr. Randy Didier, the previous manager. AUF has met with Mr. Didier numerous times over the past year, beginning in March 2010 and continuing through June 2010.

AUF has also met with members of some of these associations in South Seas. Field visits were made to these locations, and as agreed upon by the previous property manager and associations, AUF conducted a thorough analysis of each location. During the field visits with the previous property manager and with the associations, it was discovered that some of the associations did not even have a deduct meter.

The majority of the properties represented by the management company were resolved as a result of the numerous meetings held. One exception was the Beach Villas III. Originally, in June 2010, the representative of the BV III, proposed a resolution and agreed to the proposed settlement of this account by AUF. However, before this issue was resolved, Mr. Didier left the management company.

Subsequent to the customer meeting on November 18, 2010, AUF held several discussions with Mr. Brunner concerning the past actions which had taken place and the Company believes a resolution has been reached.

Please see the following summaries of each association in question:

The Associations were sent letters in July and August of 2010 outlining each question and considerations originally raised to the PSC by the customer letters. As indicated above, AUF has had discussions as recent as 12/15/10 with the current Island Management representative Steve Brunner.

Bayside Condominium Association

The deduct meter had not reinstated upon initial request. However, it has since been reinstated and this account is being re-billed with any associated deduction credits.

Beach Cottages Condominium Association

This condo association never had a deduct meter installed. It was explained to Mr. Lloyd that AUF was prohibited to offer any "subjective" monthly credits to the account, since the Company is required, by Florida Statute, to bill customers according to its approved tariff. AUF offered to sell the association a water meter, at its cost for subsequent installation. Mr. Lloyd accepted this offer and Beach Cottages installed the deduct meter on August 5, 2010. There were initial billing issues with this deduct meter. However, this has been corrected.

SSP Beach Home Condominium Association 1 – 13

This account has continuously been on an active deduct meter.

SSP Beach Home Condominium Association 14 – 26

This account has continuously been on an active deduct meter.

SSP Beach Home Condominium Association 27 – 33

This account has continuously been on an active deduct meter.

Beach Villas III Condominium Association

The appropriate deduct meter was reinstated and re-billed reflecting the agreed upon credits. These credits were a result of the continued efforts of AUF, the previous property manager, and the condo association through the complaint resolution. During the process of the complaint resolution the bills were being held by AUF pending the outcome of the process. Since a resolution has been obtained by all parties, the bills will no longer be held. As indicated above, the Condo Owners Association has agreed with the credits offered by AUF, based on the in depth analysis of the past water consumption on the installed deduct meters as of December 15, 2010. Currently, this account is billing correctly and will continue to be monitored by the AUF office in conjunction with Island Management.

Gulf Beach Villas

The deduct meter is in the system. However, this deduct meter is currently estimating, due in part to the fact that this meter being constantly under water and difficult to read. It was determined that a leak is occurring and Island Management was notified on December 14, 2010. The estimated bills will be corrected once an actual read is able to be obtained to reflect actual deductions.

Marina Villas

Marina Villas never had a deduct Meter. However, the water meter was incorrectly sized in the billing system as a 5/8 meter, and should be billed as a 2 inch meter. This has been corrected.

Sunset Beach Villas

The Deduct Meter is in place and on the account. The deduct meter was previously estimating and has been corrected.

Tennis Villas

The deduct meter was reinstated and is billing correctly as of December 2010. This account was credited back to last year for amount recorded on the deduct meter. This account is now up to date and is being billed correctly.

Additional PSC Staff Request:

Provide information concerning multiple sewage spills related to liftstation malfunctions that occurred in September of 2009.

Response:

September 2009: There were five abnormal events that took place involving the South Seas system: three at Lift Station #4; and, two at Lift Station #2. All events were reported to the FDEP and cleanup activities occurred promptly.

The events involving Lift Station # 4 were due to both pumps tripping the heater overload switches and one of the pumps ultimately failed. Both pumps have been replaced by AUF.

The events involving Lift Station # 2 were due to a breaker tripping on both occasions. AUF technician checked the panel and breakers for loose connections. This lift station has not had any further issues to date.

During this past year there has been over $46,000 in capital investments in the South Seas lift stations to replace pumps and control cabinets, upgrade the power supply and repair a part of the collection line.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

Gainesville Customer Meeting Response

Overview: The Alachua customer meeting was held on October 21, 2010, in Gainesville, Florida. Approximately 8 customers provided comments to the Commission staff during the meeting.

The majority of the customers' comments related to the rate increase and level of bills.

One customer indicated that she believed the customer service representatives were rude. When asked by the PSC staff attorney when this occurred, the customer indicated it was over 1 ½ years ago.

Vernon Berger – 7117 SW Archer, Gainesville

Mr. Berger provided comments concerning a bill which contained backbilling charges for wastewater service.

Response: Mr. Berger's high bill concern was due to being back billed for sewer charges. This customer was back billed for wastewater services for a period of 300 days. This was a result of the customer only being set up for water service in the billing system at the time Mr. Berger moved into his residence and not having wastewater service established.

The amount of the back bill was in compliance with Rule 25-30.35 Florida Administrative Code.

However, after the meeting, AUF discussed this situation with Mr. Berger. Subsequently, the customer was called and apologized to for the error of not properly applying sewer charges to his account at the time he activated his service with AUF. As a result, the customer was given an abatement on his account in the amount of $616.27.

Lola Ferguson – 7117 SW Archer, Gainesville

Ms. Ferguson provided comments concerning a water heater and interior plumbing damage due to what she believed was sand in water. She stated that a damage claim was pending.

Response: Ms. Ferguson's claim was denied due to the deposits not being "sand" but actually calcium deposits that had built up in her water

heater over a period of time.

Shirley Crosby – 7117 SW Archer, Gainesville

Ms. Crosby provided comments concerning water running down street during January & February of 2010.

Response: A leaking valve was brought to the attention of the AUF Field Supervisor in late February 2010. The late notice of this leak was due to a change in personnel for that service area. Due to the Non Severity of the leak, a schedule to replace the valve was prepared so proper notification could be provided to the customers and regulatory agencies. The valve was replaced on March 2, 2010.

Pat Compton – Arrendondo Estates

Ms. Compton raised an issue regarding "soap suds in the water and it's not drinkable". In review of the records, there was no information found with regards to Ms. Compton reporting this type of issue. In review and in discussions with AUF field staff, there is no reason as to why there would be soap suds in the water or any condition that would result in this type of situation.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

Green Acres Customer Meeting Response

Overview: The Lake Osborne customer meeting was held on November 4, 2010, in Green Acres, Florida. Approximately 10 customers provided comments to the Commission staff during the meeting.

The majority of the customers' comments related to the rate increase and level of bills.

Justin Thompson – 5386 Lake Osborne Blvd.

Mr. Thompson indicated that when he called the CSR, he was placed on hold for 20 min. He also indicated that he had received bill 2 days before the due date and keeps getting late fees.

Response: Mr. Thompson moved in on September 2009. Since that date, he has had 2 late fees charged to his account, both in 2010. As of November 23, 2010, there has been a Shut Off for Non Payment issued for this address. Mr. Thompson has not paid his last bill in the amount of $131.01. On 11/22/2010 he called to inform us he is moving out.

Below is a table indicating the mail date and the due date for Mr. Thompson.

Justin Thompson	
Bill Date (Mailed)	Due Date
8-Nov	30-Nov
8-Oct	1-Nov
9-Sep	1-Oct
9-Aug	31-Aug
9-Jul	2-Aug
8-Jun	30-Jun
10-May	1-Jun
8-Apr	30-Apr
8-Mar	30-Mar
8-Feb	2-Mar
11-Jan	2-Feb

Once a customer receives a bill, they have 21 days to make payment before being considered delinquent. Once the account is in arrears for a

period of time, a customer will receive a shut off notice advising that the service will be turned off in 10 days. The PSC rules on shut off notices require a 5 work day notice; however AUF's policy is to allow additional time. Further, customers are called before any action is taken to let them know that their service may be turned off.

Linda Berg – 1515 Shirley Court:

Ms. Berg indicated that her bills did not make sense and stated that in 2006, she was billed for 17,000 gallons of usage.

Response: A review of Ms. Berg's account shows that in June 2006, she was billed on an estimated consumption of 8,000 gallons. In the subsequent month, July 2006, Ms. Berg was billed based on an actual read for a consumption amount of 17,000 gallons. This was the only time Ms. Berg received an estimated bill.

A further review of Ms. Berg's account shows that prior to the implementation of the increased rates, this customer historically experienced several months each year with high consumption. A further review of the usage on this account over a 2 year period (December 2008 – November 2010), shows there have been 3 times (August, September, and December 2009) when usage has gone up from the monthly average of 8,292 gallons. These usage "spikes" were for 14,400, 10,600, and 11,500 gallons respectively.

Also in August 2009 she had a leak and used 14,400 gallons.

Attached please see the consumption history from 2006 – 2010 for Ms. Berg.

AUF tested the water meter and accuracy was confirmed. The test results were previously provided to Staff at the PSC regarding the meter test conducted in September 2007.

A review of Ms. Berg's account shows that there have been 3 service orders since 2007. The first was in May 2007 to review the meter and it was found to be in good operating order. On June 4, 2007 the address was visited again and an on-site test was performed; high flow; 100.77%, med flow; 101.51%, low flow; 97.99 % with an average of 100.9% thus passing the accuracy test guidelines established by the FPSC. The last visit was in August 28, 2009 to address a low pressure issue. It was found that the customer had a leak in the home.

Alfred Binner – 1507 Crest Circle:

Mr. Binner stated concerns about bill estimates.

Response: Review of this account shows that Mr. Binner did have an issue with estimates on two occasions in 2008. AUF went out and replaced the meter in 2008 and since that time, Mr. Binner has had no estimated bills.

Ray Thomsen– 5438 Lake Osborne Dr., Lk Worth
PSC Specific Request: Need explanation of procedure used for cutoffs due to non payments. Mr. Thomsen indicated that a cut off occurred in the evening. What time did his cut off actually occur?

Response: Mr. Thomsen is no longer a customer of AUF, and continues to have a balance on his inactive account. A new customer moved into this residence in March 2010, and the account is currently up to date.

Review of Mr. Thomsen's account shows that the customer had two Shut Off for Non-Payments (SNOP) in 2009, one in November 2009 and the other in December 2009. In January 2010, this account was Turned Off and Blocked (TOBK) due to the fact that there had been water usage on the account after it had been shut off. AUF addressed this situation in January 2010 with the TOBK.

Notably service was shut off in both instances on a weekday. Upon review, the time of the shut off was not documented, just the day the termination occurred.

It should be noted that Rule 25-30.320(6), Florida Administrative Code only addresses termination of service on weekends and public holidays.

Ray Thomsen– 5438 Lake Osborne Dr., Lk Worth
Additional PSC Specific Request: Mr. Thomsen noted that the Utility's water lines are in the back of his property. In general, how does the Utility gain access to non-roadside lines in order to maintain them? Are there "right of way" privileges? Are there any existing problems in any of the Utility's systems related to this matter. Please explain.

Response: As is the case in many of the systems that AUF acquired, the original owner installed lines in the rear of homes to take advantage of reducing the amount of main-footage that is required. This is the case with this system. Though not the preferred methodology of installation, AUF has not relocated these lines due to significant relocation cost, which would be borne by the ratepayers.

In 2007 and 2008, AUF conducted the meter replacement project in all of its Florida water systems, thus reducing the amount ingress and egress from properties. Prior to this meter replacement project, AUF had considerable challenges in several systems due to fencing, guard dogs, and customers who would not allow access in order to get appropriate meter reads. Since the meter project, the amount of inconvenience on the customer and AUF has been reduced considerably.

AUF also has "blanket easements" within all applicable systems allowing access to perform necessary repair and maintenance services. AUF staff members contact customers via telephone and/or a personal visit when it concerns an immediate repair. The majority of customers understand that AUF has to maintain its lines and from time to time might have to conduct a repair. AUF personnel work with customers if the situation is not an emergency. In exercising its rights under the blanket easements, AUF's policy is to minimize disruption and reduce any and all property damage to the surrounding area.

Aqua Utilities Florida, Inc.
Docket No. 100330-WS
Lakeland Customer Meeting Response

Overview: The Lakeland customer meeting was held on October 28, 2010. Approximately 36 customers provided comments to the Commission staff during the meeting.

The majority of the customers gave input regarding the level of the rates and bills. Ten customers provided input concerning the secondary water quality in Zephyr Shores. Zephyr Shores is a community of about 500 customers and is one of the systems in the secondary water project. AUF installed a "sequestration" treatment system in March 2010. This system binds the naturally occurring calcium, iron and manganese in the water, which reduces the residue customers might see on dishes and fixtures.

David Busey

Mr. Busey raised concerns about customer service, rate structure and the level of rates. He also advocated for FGUA to take over the system. Mr. Busey spoke previously about these same issues at the customer meeting in New Port Richey.

Frank Reams

Mr. Reams is not a customer of AUF. However, he raised concerns about customer service, rate structure and the level of rates. He also mentioned three customer billing issues but did not specify the time period or names of these customers. He further advocated for FGUA to take over the system. Mr. Reams spoke previously about these same issues at the customer meeting in New Port Richey.

Charles Bleam, 5502 Wyndermere:

Mr. Bleam indicated he had been a resident of Lake Gibson since 1960. He indicated that the water is good and the wells are good. He has no complaints with the water. However, he requested the Commission revisit the rate structure imposed in 2008, because he asserted it punishes large families. He expressed a desire for the county to take over the system.

Phyllis Johnson, 5918 Doe Circle W., Lake Gibson:

Ms. Johnson indicated that she has no complaints with the water and that the service is good. This customer questioned the level of rates and rate increase.

Commission Staff Requests:

Please provide billing information which includes consumption and the dollar amount billed (water and or wastewater) for the following customers for the year 2009 to present:

Michael Griffin – 2005 Christy, Lakeland

Staff Request: Questions consumption. Has requested meter change out. Provide detail.

Response: A meter test was completed on November 19, 2010 with a meter certified testing unit. The water meter test average was 98.7% which passed test.

Below are the results of the water meter test performed on November 19, 2010:

Low: 98%
Med: 98%
High: 100%
Average of 98.7%

In reviewing Mr. Griffin's account, there are no abnormalities in his consumption. The consumption goes up and tapers down and then back up again. The water meter was installed in 2008 and the test on the customer's meter was accurate.

See the attached billing history requested.

John Round – 390 Windermere Dr., Lakeland

Staff Request: Suspects meter is reading wrong. Please perform field accuracy check.

Response: This customer's water meter was tested on 10/29/2010 and had an average accuracy test of 98.7%.

Erica White – 5560 Daughtey Down Loop, Lakeland

Ms. White provided comments concerning past bills.

Staff Request: Put on payment plan for high bill.. Please explain.

Response: Customer was billed for zero consumption for five (5) months. Once the situation was rectified by replacing ERT unit, AUF billed for the

five (5) months based on an actual read. This situation resulted in the customer being put on a payment arrangement plan due to the period of time the bill was for.

Lew Carriere – 1026 Wildwood Ave., Lakeland

Staff Request: Explain way fire hydrants are being removed from service area.

Response: AUF has not removed any fire hydrants in Lake Gibson. We have currently listed 20 Fire Hydrants in the Lake Gibson service territory. Aqua has replaced 3 existing fire hydrants over the past year due to operational issues. They are located near 490 Platt St., 420 Byrd St., and 5810 N. Daughtery.

Bradley Fox – 5712 Lake Breeze Ave., Lakeland

Staff Request: Water tank left uninstalled on private property (Byrd St. and Plant St.) for four years. Please explain.

Response: The tank in question was located on AUF's property for three (3) years. Aqua had determined that installing a small tank would improve system operations and water quality. The tank was purchased and prior to installation, the engineer determined the existing concrete pad and cradles were not sufficient to support the new tank. In order to construct the new pad an engineer was required to evaluate the existing pad, conduct a structural analysis, and submit the plans for permitting. Once all permits were in issued, the tank was installed. To date this tank is performing up to standards.

Bryan Rule – 5880 Jacolanda Ave, Lakeland

Staff Request: Provide reason why water service was out at the Lake Gibson system for an extended period of time in July or August of 2010, and why boil water notices were not issued to the customer.

Response: There was not an extended water outage. There was an outage on July 20, 2010 due to a leaking valve. A boil water notice was issued on the same day, and was subsequently lifted on July 22, 2010.

There was another water outage which occurred on September 7, 2010 due to a contractor damaging AUF's water pipe. The repair occurred on September 9, 2010. All customers were issued a Boil Notice Water on September 7, 2010. The Boil Water Notice was lifted on September 10, 2010.

Wayne Miles – 6301 Doe Circle E., Lakeland

Staff Request: Please explain why insurance claim was denied by the Utility for property damage due to a sewer backup.

Response: This incident occurred on August 30, 2009. The customer submitted the final supporting data on September 21, 2009. Customer signed the release on October 1, 2009, and the claim was submitted for Payment on October 5, 2009.
Check Number 310933, dated October 15, 2009 was issued to the customer and it has been cashed.

The Original Claim was denied due to inadequate information to substantiate the amount of the claim. As evidence by the timeline above, all information and matters were handled in less than 35 days from time of notice.

Joya Teter, 3865 Daughtery Downs

Ms. Teter indicated that she has a family of 5 people. Her bills usually run at $200/ month. She received a bill last November 2009 for $400. She indicated that she called CSR for 2 days. She stated that there was no way usage could double in one month.

Response: Ms. Teter did have one month where her usage spiked to 19,000 gallons, up from her average of around 6,500 gallons. After this month and up until now she has gone back to a normal usage. The AUF technician was dispatched to review the meter and to discuss with her this usage. However, no abnormalities were found wrong at this address. There were no leaks detected by the technician.

Judy Dent – 5800 Jacaranda Ave, Lake Gibson

Ms. Dent indicated that in March 1989, received a $130 bill and that she called the company to see if she had a leak. Ms. Dent indicated that she was told had to pay the bill.

Response: AUF has reviewed Ms. Dent's account. She and/or her husband have called a total of 4 times since 2007. Two of these calls were to discuss when the bill was due and the amount. In May 2009, her husband called to ask about the bill and if the amount was due to rate increase (with step rates being introduced). One other call in 2008 was inquiring as to why there was no water. There was a main break which occurred during this incident.

The customer's usage has remained constant over the last two years except for one month and then the usage went back down.

Kim Parizo – 6317 Doe Cir. East, Lake Gibson

Ms. Parizo indicated that there is no way she uses 4,000 – 5,000 a month. She indicated that she fills her pool and that water doesn't go to wastewater. In June, Ms. Parizo indicated that she was billed for 14,000 gallons and she wasn't there for several days. She believes that the meter reading must be wrong. She commented that she called CSR and was told "can't help you" and "you must pay the bill". She stated that she never got a bill that high since.

Response: AUF reviewed Ms. Parizo's bills since 2006. The customer has always maintained at least this usage that she states. Ms. Parizo used this amount of water/sewer before the new meters were installed and since. She has spikes both pre and post the new meter installation which indicates random usage for pool and or irrigation. She had several months prior to the new meter being installed where she used approximately 14,000 gallons. In all instances, she has spikes at least once or twice a year and then goes back to normal usage.

Addition Requests from the PSC staff:

Explain why customers with both residential and irrigation meters receive two different bills; and whether a single combined bill could be sent to those customers, if not, why not.

How many customers with residential and irrigation meters receive two different bills per billing period?

Response: Currently, AUF has 241 customers who have this situation. They reside in the Fairways system. AUF is currently experiencing a migration of these customers from two meter to one meter. The customers in Fairways have two separate water services, one for potable and one for irrigation service. The customers currently receive a separate bill for the irrigation service.

The current billing system does not have the capability of providing two water accounts on one bill. If a customer does receive multiple bills they can include both bill stubs in one envelope with one check for both accounts.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

New Port Richey Customer Meeting Response

Overview: The New Port Richey customer meeting was held on October 20, 2010, in New Port Richey, Florida. Approximately 33 customers provided comments to the Commission staff during the meeting.

The majority of the customers gave input regarding the level of the rates and bills. Ten customers provided input concerning the secondary water quality in Zephyr Shores. Zephyr Shores is a community of about 500 customers and is one of the systems in the secondary water project. AUF installed a "sequestration" treatment system in March 2010. This system binds the naturally occurring calcium, iron and manganese in the water, which reduces the residue customers might see on dishes and fixtures.

Two customers provided input on service related issues pertaining to a service line break. One customer provided comments on a main break caused by Verizon. Several customers provided comments as to the payment of the base facility charges while not in residence.

Five customers provided comments on a stormwater retention pond. In review of this situation, there is a retention pond located between AUF's effluent retention ponds and spray field. This stormwater retention pond is owned by Pasco County and therefore, it is the responsibility of the County to maintain this stormwater retention pond. The County has been notified of this situation

Senator Fasano

Senator Fasano discussed economic hardship and advocated for FGUA to takeover the systems in this county.

Representative Legg

Representative Legg indicated that he represents Jasmine Lakes and cited economic hardships in the area.

Representative Weatherford

Representative Weatherford represents Zyphyr Shores and expressed his opposition to the inclining rate block structure approved by the PSC in the last AUF rate case.

County Commissioner Cox

Pasco County Commissioner Cox presented a letter in opposition to the rate increase and cited economic hardship for Jasmine Lakes. He referred to the replacement of old water meters with new RF meters and indicated this would provide more accurate billing to the customers.

County Commissioner Mariano

Pasco County Commissioner Mariano expressed a variety of concerns and advocated for FGUA to takeover the systems in this county. He further advocated that the PSC maintain the current rates.

David Busey

Mr. Busey raised concerns about customer service, rate structure and the level of rates. He also advocated for FGUA to take over the system.

Frank Reams

Mr. Reams is not a customer of AUF. However, he raised concerns about customer service, rate structure and the level of rates. He also mentioned three customer billing issues but did not specify the time period or names of these customers. He further advocated for FGUA to take over the system.

Robert Provost – 7704 Hawthorne Dr., - Palm Terrace

At the meeting Mr. Provost raised a question about his past bills. Specifically, Mr. Provost provided input concerning estimated bills he had received. In review of his account history, it was discovered that this customer had called in July 2007 indicating he had received estimated bills. Mr. Provost had indicated in 2007 that he was a seasonal customer and should not receive any billing for usage. A service order was issued to obtain an actual meter reading on August 1, 2007. The customer called again in August 27, 2007 for a bill explanation. In October 2007, Mr. Provost called to dispute his bill.

In further review of this customer's billing history from January 2009 through November 2010, there were separate two time periods where Mr. Provost had zero consumption: once from August 2009 – October 2009 and then again July 2010 – September 2010. With respect to the 2010 period, Mr. Provost contacted AUF in 2010 and stated that he had been away from his property and had turned off his water.

With respect to the 2009 period, Mr. Provost received a bill in November 2009 based on 14,600 gallons. It appears that during this period of time in 2009 the water remained on at the residence, which is different than the time period in 2010 when he called and said he had turned off his water. There is no further explanation in the customer notes as to

the amount of 14,600 in November 2009. However, in May 2009, Mr. Provost did contact Aqua indicating there was water bubbling up in his back yard.

When reviewing the customer's consumption during the remaining months in 2009 and 2010, the customer's usage amounts were consistent. As requested by PSC staff, attached is the billing history for Mr. Provost from 2009 through present.

Mr. Provost also mentioned that the ponds have an odor coming from them. In review of this situation, there is a retention pond located between Aqua's ponds and spray field. This pond is owned by Pasco county and therefore the responsibility of the County to maintain this stormwater retention pond. The County has been notified of this situation

Celeste Snyder (Jasmine Lakes)

Ms. Snyder provided comments on odor at the wastewater treatment treatment plant and 18 wheelers that use the road for sludge removal. She also complained about a boil water notice that occurred.

Please see AUF's response to the PSC staff's question on boil water notices at the conclusion of this response.

Brian Diaz – Jasmine Lakes

Mr. Diaz provided comments concerning a water line break which occurred "before his house" and it took 4 days to fix. There are no notes on this customer's account concerning a main break. However, there is a note concerning his neighbor breaking his water meter with his truck, as well as a request to temporarily turning his service off so he could repair a leak.

He also stated he got 4 bills and they all had 4 different prices. AUF believes this was primarily due to changes in rates for interim and final rate increases from the last rate case, as well as the index and pass through which occurred in October 2009.

Diane Manzo – 7932 Lotus Dr., Port Richey - Jasmine Lakes

Ms. Manzo discussed her usage variations. In review of her usage from January 2009 to November 2010 (attached), Ms. Manzo's usage has remained relatively constant with a few months where usage went up. Please see attached spreadsheet reflecting Ms. Manzo's billing history for the past twelve months.

In one of the months with increased consumption, November of 2009, she had a leak on her side of the meter which resulted in the highest usage for a one month period 10,500 gallons. In 2010, her usage went up in June and July. We have received no customer calls from Ms. Manzo concerning consumption since the leak in November of 2009.

Richard Jenning – Jasmine Lakes

Mr. Jenning provided comments concerning the fluctuation in water usage and the increase in rates. He further provided comments concerning a ball valve in his yard with a crooked valve stem.

Marla McDonnell (Lisa Barbas is customer) – 7811 Arbordale Dr., Port Richey – Palm Terrace

Ms. McDonnell raised the issue of property damage (driveway pavers) that she believes is the Utility's responsible. She also provided comments that the wastewater treatment plant emits odor and the retention pond overflows during raining periods. In talking to AUF field staff who were working in this system at the time, there is no recollection of any situations with regards to a customer driveway or yard regarding pavers. The water and wastewater lines for these customers are in the rear of the homes and AUF has no pipes that would affect the driveways in this system.

Ms. McDonnell also made reference to wastewater odor or pond overflowing issues. AUF notes that there is a spray field irrigation system across from her home that could account for a sulfur like odor.

Again, the retention pond that Ms. McDonnell referred to is owned by Pasco County and the responsibility of maintenance rests with the County. The County has been informed of the pond's condition.

Laurie Jenss - 7400 Rhinebeck Dr., Port Richey-Palm Terrace

Ms. Jenss wanted to know about shut off notices and late/credit card fees. AUF does not charge a credit card fee. However, if used by the customers, there is a charge for Western Union services. AUF has no fees on their bills that have not been approved by the FPSC. The option of utilizing Western Union is offered as a further convenience to customers, but is not required to be used. There are various options offered to customers for payment of bills.

In review of Ms. Jenss's account, she was questioning the activation fee, or Turn On Fee. This is a fee that has been approved by the FPSC and the charge was $22.00 as provided in AUF's tariff. In addition, Ms. Jenss was properly charged a late fee in November 2010.

Peggy Magruder – 11231 Yew Tree Ave., Port Richey

Ms. Magruder claimed that she was cut off and it took 2 days to restore service. In review or this account, AUF has no record of a shut off for non-payment occurring at this residence, however, there have been a significant amount of late fee charges.

Michael Rock – 7430 Rhinebeck Dr., Port-Palm Terrace

Mr. Rock was inquiring as to damage caused due to flooding. On September 13, 2010, Pasco County struck and broke one of AUF's 2" line at this address. The County notified Aqua and our technician was dispatched. The County fixed the leak and made restoration based on this leak in all areas that were appropriate.

Additionally, the County started work prior to Aqua providing locates to this project as outlined in the locate request. Please see the attached Sunshine State One Call document concerning this line break received on September 15, 2010. The County commenced the storm water pipe replacement on September 13, 2010, which was two days before AUF received the request for line locate. As the AUF service technician arrived to locate and mark the water lines, Pasco County was already in the process of digging the ground for the storm pipe replacement.

Sadie Dye – 1814 Stanford Dr., Port Richey

Ms. Dye's concern was that the lift station across from her was unprotected and there were inoperative valves plus the meters are covered with grass. AUF notes that the lift station is protected and there are locks on the electrical panel, as well as the on the grates to prevent unauthorized access. The bypass valve is operational and as of November 16, 2010, the meter box has been replaced.

Meter boxes are located on customer property. Aqua has replaced all aging water meters with new RF meters throughout the state. It is not necessary to have access to meters and/or meter boxes in order to read these RF meters.

Mike Paone - 11235 - Palm Terrace

Mr. Paone provided comments indicating the water was "awful" and that he had put in a water softener. Mr. Paone also indicated that the water system was "old" and the water pipes had been placed into service in the 1970's. He also indicated that he believed that kids in the area were causing damage to the utility's facilities throughout the subdivision.

It should be noted that in the Palm Terrace system, AUF purchases its water from Pasco County. The water quality provided is therefore maintained by the county. Mr. Paone also commented on boil water notices. Please see explanation on the boil water notices at the end of AUF's response.

John Manzione – 7604 Hawthorne Dr. Port Richey – Palm Terrace

Mr. Manzione stated he did not get a pool credit on his sewer bill back in 2008. At that time (2008), AUF did not provide such credits given there is a cap on sewer charges. However, beginning in May 2009, AUF developed and implemented a pool credit policy.

FPSC Staff Specific Requests:

1. Explain the processes as to how and why boil water notices are issued. Please provide a list of all boil water notices issued by the Utility, the water systems that were affected, the reason why they were issued, and the length of time before they were rescinded, during 2009 to the present.

Response: When a water system experiences a drop in water pressure below 20 PSI due to a break or some other event, a Boil Water Notice will be issued. All Boil Water Notices are delivered and hung on the customer's door via door tag notice. In addition, the field technician assigned to the system in which the notice will be issued is responsible for contacting the state customer service personnel (CSR) and operations management alerting them of the outage or pressure problem that requires a Boil Water Notice to be issued. The state customer service personnel will then post all relevant information including the cause of the Boil Water Notice to Aqua's internal intranet site. This site is used by customer representatives to relay important information to customers who call in.

All Boil Water Notices will remain in effect until a sample is taking and tested by an independent lab and found to be safe and satisfactory. Once the results are received and reviewed, AUF field staff will hand delivery a rescind notice to all effected customers. The rescind notice will be hung on the customers door.

In addition, Aqua has begun using a telephonic relay system called SwiftReach to contact affected customers.

Attached is the listing of boil water notices requested by staff.

Additional Information Concerning Aqua's billing procedures: Once a customer receives a bill, they have 21 days to make payment before being considered delinquent. Once the account is in arrears for a period of time, they receive a shut off notice of 10 days. The PSC rules on shut off notices require a 5 work day notice; however AUF we gives additional time. Further, customers are called before any action is taken to let them know that their service may be turned off. We do offer payment plans to our customers. The company's policy is to offer two payment plans per account.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

Palatka Customer Meeting Response

Overview: The Palatka customer meeting was held on October 22, 2010. Approximately 11 customers provided comments to the Commission staff during the meeting.

The majority of the customers provided comments related to the rates and rate increase.

Roy Ooten – 230 N. Hwy 17, Palatka

Mr. Ooten questioned his billed consumption. He stated that he has parked his vehicle over the water meter for 3 months and no one came out to examine it.

Response: This customer claims that AUF could not read his meter in 2008 but continuously charged at least 3,100 gallons per month. After further reviewing this customer's readings and consumption, it was determined that the consumption amounts were correct and consistent with the exception of one estimated read in October 2009.

The customer's notes on his account indicate there have been two calls concerning high usage. The first occurred in December 2006 and the other in October 2009. AUF reviewed and found no issues at this property. Aqua contacted the customer and attempted to explain the bill; however, the customer was not interested in any explanation.

As previously stated, AUF replaced all its old water meters with new RF water meters. With these replacements, it is no longer necessary to have access to the customers' individual meters and/or boxes to read the meters.

As requested by PSC staff, attached is the account history for Mr. Ooten from 2009 through present.

Larry Mathews – 124 Palm Trail, East Palatka

Mr. Mathews provided comments concerning how the new meters are read and the boil water notice which occurred. He indicated that no door hangers were provided. Mr. Mathews also commented that he was "thrilled" that AUF had installed new water meters.

Response: In review of Mr. Mathews' account and any and all service orders for Mr. Mathews, AUF found no issues with his meter or with his billing. In addition

AUF reviewed the account for any information regarding his claim of non-issuance of boil water notices. The AUF technicians were also questioned as to the practice. It was determined that in this system we provide notice to the affected customers via door hangers.

Mr. William Jordan – 104 Orange Dr.

Mr. Jordan provided comments concerning erosion issues into the canal originating on the utility's property.

Response: Subsequent to the customer meeting, Jack Lihvarcik and Harry Householder met with the original complainant, Bill Jordan on November 12, 2010. Inspecting the property, AUF has an inlet which drains into the canal and in areas along the path of the pipe to the canal are depressions. This could be a result of the pipe rotting and soil washing into the pipe. AUF plans on video inspecting the pipe to determine if dirt is washing into the pipe. Based on the findings we will determine if the pipe will need to be replaced or repaired. Once the pipe is determined to be working properly, the depressions will be filled and sod installed to eliminate erosion. The top of the property will need to be restored back to original design, recreating a swale so water will drain properly to the inlet, as concrete pad placed around the inlet so water will naturally run into the basin. The bulkhead will need to be raised to complement Mr. Jordon's existing bulkhead elevations and a concrete cap poured on top of the bulkhead. To eliminate a wash into the canal during peak rainstorms a small retaining wall needs to be constructed at the same location as Mr. Jordon's wall and connect into the neighbors wood retaining wall such as not to damage or cause any erosion during rain storms.

The Majority of the problem is due to the natural flow of water and sediment down the canal.

Mr. Charles Davis – 102 Orange Dr.

Mr. Davis also brought up concerns on the sea wall. Further, Mr. Davis expressed concerns on the level of his bills.

Response: See response above concerning the seawall.

Patricia Davis – 102 Orange Drive

Ms. Davis provided comments that Aqua has not been maintaining our facility for over 10 years. She stated that in the past a customer mowed this property in exchange for being able to park his boat on Aqua property.

Response: In the past 10 years AUF has utilized a contract service provider and has maintained the property in question. There is no nor have there been any

arrangements under AUF's ownership allowing anyone to park their personal property at its locations.

In response to a PSC staff question at the meeting regarding when Ms. Davis contacted AUF concerning the mowing of the grass, the customer responded that it was in 2007. She indicated that the property is now being maintained.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

Sebring Customer Meeting Response

Overview: The Sebring customer meeting was held on October 27, 2010, in Sebring, Florida. This meeting primarily covered both the Highlands and Hardee County systems.

Approximately 21 customers provided comments to the Commission staff during the meeting.

The majority of the customers provided comments on the level of rates.

The Highlands county systems, Lake Josephine, Sebring Lakes, and Leisure Lakes systems are part of AUF's secondary aesthetics water project. AUF and OPC have met with the customers of these systems to discuss the efforts being made to address the aesthetic water concerns. AUF has explained that these issues revolve around the level of sulfur in the water supply. AUF has proposed and is actively pursuing the installation of an AdEdge filtering system to remove the sulfer content. These treatment systems are included in the rate case as pro forma plant additions.

Jonathan Patton – 122 Leona Dr., Sebring

Mr. Patton provided comments concerning consumption fluctuations. The customer believed that the customer service was unhelpful. PSC staff has requested that AUF provide records of customer contact.

Response:

Mr. Patton's usage was high during the months of:

- July 2009 - 10,200 gallons
- August 2009 - 15,300 gallons
- September 2009 - 10,900 gallons

However, his usage went back down in the months of:

- October 2009 - 5,700 gallons
- November 2009 - 5,400 gallons

The customer's wife, Nancy, called in August 2009 in regards to high bill and was advised to check the property for leaks.

The wife, Nancy, called back on October 14, 2009 in regards to her past due balance and to see if AUF had received payment in the amount of $100. She was advised that payment had not been recieved. She was also advised that a payment of $100 was not sufficient to stop the shut off, since the past due balance was $220.76 at that time.

Mr. Patton called on October 15, 2009 and asked if AUF had received the payment for $100. He was advised that the payment had not been received, and again that $100 was not enough to stop the shut off. He was further advised that he was not eligible for any further monthly payment arrangements. Aqua did offer to place a courtesy hold on the account to allow a couple more days for his payment to be received and for him to pay the difference. Mr. Patton then requested to speak to a supervisor, and in turn the call was transferred to the senior representative.

The senior representative spoke to Mr. Patton, who for the first time mentioned that he was not receiving his bills. He was then advised that AUF had no records showing that the bills had been returned back to the company. The senior representative advised him that $220.76 needed to be paid by October 19th in order to guarantee service. Again he was informed that he was not eligible for any further arrangements because he had been offered two previous payment plans in July 2009 and September 2009 and had defaulted on both.

Mr. Patton called on again on October 18, 2009 and made a payment in the amount of $120.76. In addition, his mailed payment of $100, which was subsequently posted on October 20, 2009, thus satisfying the shut off amount. Mr. Patton stated he will continue to make payments on the account.

Concerning the late payment charges, in reviewing the timing of Mr. Patton's payment history, this customer is late on payments each month. This account has not been at a zero balance since the account was opened back in March 2009, which has resulted in late fees. Further, Shut Off for Non-Payment (SNOP) notices have been sent 6 out of the 20 months that Aqua has provided service to the customer.

Cefie Metayer – 802 Sally Place, Wauchula

Ms. Metayer provided comments concerning high water consumption and questioned her meter accuracy.

Response:

Summary of customer account – Cefie Metayer

Ms. Matayer apparently owns two houses in the Peace River system.
Prior to Ms. Metayer moving into and receiving service at 802 Sally Place, this customer occupied and received service at 833 Chamberlain on the same

system. Below is a summary of Ms. Metayer's account while a customer at 833 Chamberlain Drive:

Customer took financial responsibility of the property at 833 Chamberlain on March 15, 2007. The first bill was estimated, and each bill thereafter was based on actual consumption.

- Customer did not make first payment until November 29, 2007.

- Termination notices were sent on:
  - 08/27/2007
  - 10/13/2007
  - 09/20/2008
  - 10/17/2008
  - 11/17/2008

- Customer's account was moved out for non payment on December 10, 2008.
- Turn off and block was issued on January 21, 2009 for this customer and water turned off
- Turn off and block was issued on March 20, 2009 for this customer and water turned off
- Customer's account was turned on and moved back into service on July 7, 2009
- Meter was exchanged in December 2008
- Customer received bill in July 2009 for the seven month period (December through June) due to the move out for non payment noted above and for the services used by customer without consent.
- Apparently, during the period that the water service was turned off by AUF, the customer had been turning back on her service without utility permission or knowledge.
- Further Call reviews:
  a. 07/06/09
     i. Customer claims to have never received bill.
     ii. Discussed balance and history with customer
     iii. Explained the seven month period of her account being inactive due to being turned off with consumption being used. Also explained that the past due amount was being pursued by Collections agency
  b. 07/24/09
     i. Discussed account balance with customer including the seven months of services used by customer without authorization or contract

ii. Explained that $450 was due on the account and needed to be paid immediately

c. 07/21/09
   i. Customer wanted to know if bill was mailed out – Aqua confirmed it was

d. 8/12/09
   i. Customer claims to not be receiving bills, but customer appears to have the bill in front of them during the call
   ii. Customer does not understand why the $1,000+ balance on the bill is so high. Sent $400 payment, confirmed by representative
   iii. CSR confirmed the address and the post office box is correct. Customer then claimed she had only received one bill in the last year

➢ Customer was moved out for non payment.

➢ Additional notes

a. Florida Division contact:
   i. Customer claims a "major leak on customer side". Called left messages several times for customer. Customer never returned calls.

Ms. Metayer, through a family member, was discussing her large bill. The bill was apparently due to a large leak on the customer side. AUF assisted the customer in locating the leak with the customer and offered an adjustment if she got it repaired and could provide documentation.

This customer subsequently moved to another location (802 Sally Place) and the balance she owed on her account was applied to the new account at her new location. This occurred in January 2010 and she was advised of this balance transfer. Over $5,000 was transferred from her previous account to the customer's new address, also on Sally Place. The customer has since paid her bill in full and is current on her account.

PSC staff has inquired whether a field accuracy check had been performed on this customer's meter? In so what were the results? If not please do so.

Response: As requested by the PSC staff, a water meter test was conducted on November 19, 2010.

Below are the results of the water meter test:

Low Flow: 98%
Med Flow: 98%
High Flow: 100%
Average: 98.7%

The test kit used for the meter test was a Sensus Unit.

Marilia Cimeus – 752 Chamberlain Blvd., Wauchula

Ms. Cimeus provided comments on past bills and a shut off notice.

PSC Staff Request: Provide possible disconnect activity for non payment information.

Response: Ms. Cimeus had 2 shut off notices for non-payment in 2009 (January and November). In 2010, she has had 4 notices (January, March, May, and August 2010 - Attached).

Over the course of these noticies, Ms. Cimeus' service was turned off once. In more than one case, Ms. Cimeus had sent her payments to various other addresses, other than the one that accompanies Aqua's bills. She has sent bills to Leesburg and Winter Haven. According to the notes, Aqua's CSRs have repeatedly provided the correct address over the phone to both Ms. Cimeus and her designated family member.

Peter Maceri -- 2304 Oak Beach Blvd, Sebring

Mr. Maceri provided comments concerning billing adjustments. Mr. Maceri also commented that since the meter was read during a leak incident, AUF should have notified him that he had an ongoing leak.

PSC Staff Request: Explain the Utility's procedure of notifying customers of problems on their side of the meter.

Response: On December 7, 2009, Mr. Maceri called and advised that when he returned home from vacation, he detected a leak on his side of the meter. Mr. Maceri was informed of AUF's leak adjustment policy, which is 50% of the bill for that event, provided that data is submitted showing the leak was repaired. (Examples of such documentation include a plumber's bill or an invoice showing that the customer bought parts to repair the leak.)

Mr. Maceri disputed AUF's leak adjustment policy and wanted a further adjustment.

On December 16, 2009, AUF visited the property to gather a meter read based on Mr. Maceri disputing the consumption. The customer told the AUF technician he had a leak; however, at this time there was no leak visible. Mr. Maceri continued to object the way AUF calculates leak adjustments.

Mr. Maceri's account was revisited in billing and with local senior management and Mr. Maceri received additional adjustments on his account for this leak, bringing the total of adjustments to $2,158.21.

Bernestine McLeod -- P.O Box 174, Wauchula

Ms. McLeod provided comments concerning improper service cut off in early 2010, due to non-payment.

Response: Ms. McLeod was disconnected on January 5, 2010. AUF provided a letter notice that was mailed December 18, 2009 with a follow up phone call on December 28, 2009. Customer called January 5, 2010, made a payment, and was reconnected on the same day - January 5, 2010.

Tamra Mathy – 1934 Canary Way, Sebring

Ms. Mathey lives near the water plant and provided comments concerning chlorine levels in the water, possible sewer, and road damage due to construction traffic at the water treatment plant near to her residence.

Response: On several times, the technician has discussed the chlorine levels with the customer regarding and has tested the chlorine levels several times. Each time, the chlorine levels were within limits established by DEP. The customer stated that she had called the EPA and they came out.

This system has high sulfur content which requires both the use of chlorine and continued flushing to maintain the water quality and keep the sulfur bacteria in check. In the meantime, as part of AUF's secondary aesthetic water quality project, AUF has proposed pro-forma plant to install an AdEdge filtering system that will remove the sulfur. AUF is currently working on getting this filtering system designed and installed. This system should be operational in the first quarter of 2010, and will reduce the necessity to use elevated levels of chlorine and limit the amount of flushing.

Daryle Cook; 690 Chamberlain Blvd;

Mr. Cook discussed that AUF might have charged a connection fee in mistake.

Response: In review of the notes and the history of the account, there are no fees associated with connection since she has been with AUF.

Ms. Susan Yates; 722 Chamberlain Blvd

Ms. Yates provided comments concerning the level of rates and quality of water. She indicated that she had discussions with Ms. Laura King at the PSC

concerning payment plans and turning water service off. Ms. Yates indicated that AUF does not bill on a 30 day billing cycle, but bills on a 45 day billing cycle.

Response: In review of Ms. Yates' account, AUF notes that since February 2008, the customer's billing dates have ranged between 28 and 33 days. AUF's bill cycle goal/parameters are 26 – 35 days. Review of this customer's account shows that there have been many issues with payments, backed up sewer lines on the customer's side of the connection, and other billing payment issues. Further, during the PSC monitoring in 2009, AUF provided updates and responses to Ms. King in reference to specific issues on billing and consumption.

Adeline Hudson, 1204 David Ct; Peace River

Ms. Hudson provided comments concerning bills she had previously received from AUF. She disagreed with the rate increase and indicated that her water service was turned off.

Response: After review of Ms. Hudson's account, it was discovered that her account is turned off and "inactive" in the system. Ms. Hudson has been sent to collections for an outstanding sum of $980. She has called in periodically to determine her balance and has been offered payment arrangements in the past.

On October 28, 2009, this customer called and stated that there was a leak in her home. She told the CSR that she tried to turn the water off herself, but the valve was broken. AUF had a contractor fix the broken valve on October 30, 2009.

The customer called Aqua on March 31, 2009 to see if payment arrangements could be made, the customer was advised that the account could not be placed on hold until the next day. On May 21, 2009, the customer called to see if the Shut Off for Non-Payment (SONP) could be extended. The customer was told she would need to pay $63.91; however the customer never sent payment. The customer called again on November 6, 2009 to receive a payment arrangement. She was told that she would need to pay $93.91, but never did. The customer was shut off in December 2009.

As indicated in the SONP history below, the customer repeatedly provided the service technician an excuse and was not shut off until the last time in December 2009.

- 1/09 – 3 Day notice left
- 2/09 – Door tag left, per tech customer states she mailed in payment.
- 3/09 – Per tech – the customer states she made payment arrangement, door tag left. This was not an accurate statement and the customer was not on any payment arrangements.
- 5/09 – Per tech - the customer stated she paid bill, left door tag.
- 6/09- Per tech – the customer stated she paid bill per money order, left door tag.

- 7/09 – SONP canceled due to a High Consumption complaint.
- 12/09 – Customer's account shut off for non payment.

Several attempts have been made to contact the customer by telephone with no success. In a further attempt to contact the customer, on November 29, 2010, a letter was sent to Ms. Hudson concerning her account. Aqua has indicated that in an effort to get her service restored, the utility would be willing to place the customer on a payment plant. This is conditioned on the customer receiving financial assistance from a community organization in making a payment on your behalf.

Further, concerning the leak at her residence, Aqua advised the customer to contact an outside plumber to repair. Upon providing documentation of any repairs, the customer may then be eligible for a leak adjustment to the account.

Commission Staff Requests:

1. Multiple customers from the Peace River system complained about a boil water notice which appears to be ongoing. Is there an ongoing boil water situation? Please explain the situation.

Response:

From January 2009 to November 15, 2010, there were a total of five (5) boil water notice events in the Peace River system:

August 2009: 1 day in duration due to a broken pipe at the plant being repaired

March 2010: 1 day in duration due to flushing being conducted

April 2010: 1 day in duration due to detection of Coliform Bacteria in the water exceeding FDEP standards. Retesting of the water took place and showed to be in compliance

May 2010: 1 day in duration due to water main line being repaired

August 2010: 1 day in duration due to well pump failure

2: Explain the processes as to how and why boil water notices are issued. Please provide a list of all boil water notices issued by the Utility, the water systems that were affected, the reason why they were issued, and the length of time before they were rescinded, during 2009 to the present.

Response: When a system experiences a drop in water pressure below 20 PSI due to a break or some other event, a Boil Water Notice will be issued. All Boil Water Notices are delivered and hung on the customer's door via door tag notice. The field Technician assigned to the system in which the notice will be issued is responsible for contacting the State customer service personnel and operations management and alerting them of the Outage or problem that requires a Boil Water Notice to be issued. The State customer service personnel will then post all relevant information including the cause of the Boil Water Notice to Aqua's internal intranet site. This site is used by customer representatives to relay important information to customers who call in.

All Boil Water Notices will remain in effect until a sample is taking and tested by an independent lab and found to be safe and satisfactory. Once the results are received and reviewed, field staff will hand deliver a rescind notice to all affected customers. The rescind notice will be hung on the customers door. In addition, Aqua has begun using a telephonic relay system called SwiftReach to contact affected customers in a more expeditious manner when boil water advisories are necessary.

See listing of Boil Water Notices provided in response to the New Port Richey customer meeting dated November 23, 2010.

Additional Information Concerning Aqua's billing procedures: Once a customer receives a bill, they have 21 days to make payment before being considered delinquent. Once the account is in arrears for a period of time, a customer will receive a shut off notice advising that the service will be turned off in 10 days. The PSC rules on shut off notices require a 5 work day notice; however AUF's policy is to allow additional time. Further, customers are called before any action is taken to let them know that their service may be turned off. We do offer payment plans to our customers. The company policy is to offer two payment plans per account.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

Supplemental Green Acres Customer Meeting Response

Steve Brunner – P.O. Box 100, Sanibel

Staff Specific Request:

Provide information concerning multiple sewage spills related to liftstation malfunctions that occurred in September of 2009.

Response:

September 2009: There were five abnormal events that took place involving the South Seas system: three at Lift Station #4; and, two at Lift Station #2. All events were reported to the FDEP and cleanup activities occurred promptly.

The events involving Lift Station # 4 were due to both pumps tripping the heater overload switches and one of the pumps ultimately failed. Both pumps have been replaced by AUF.

The events involving Lift Station # 2 were due to a breaker tripping on both occasions. AUF technician checked the panel and breakers for loose connections. This lift station has not had any further issues to date.

During this past year there has been over $46,000 in capital investments in the South Seas lift stations to replace pumps and control cabinets, upgrade the power supply and repair a part of the collection line.

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

Supplemental Eustis Customer Meeting Response

Bob Gruno – 34834 Haines Creek Road

Mr. Gruno asserted that there was a hole in the rear of his home that is a hazard.

Response: On December 1, 2010, the AUF technician was able to contact Mr. Gruno regarding his concern about the hole. This "hole" was actually located on his sister's premises at 11747 Hickory Lane, and not Mr. Gruno's residence.

Mr. Gruno's sister is not in residence at this time and appears to be a seasonal customer.

In respect to this issue, it appears that someone had removed the meter box from the unit and placed it in the bushes. This had created a slight indent where the box was previously located. The AUF technician addressed Mr. Guno's concern by cleaning out the area and resetting the meter box. Further the area was filed and smoothed out.

In doing so, the AUF technician observed that there were cables that were ran next to the meter, just outside or around where the box was previously located. It appears that the cable company may have removed the meter box and failed to put it back to its original state.

In review of this account, Mr. Gruno has not called since July 2009 and that was concerning billing information.

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July 5, 2011

Via Hand-Delivery

Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, FL 32399-0850

Re: Docket No. PSC-100330-WS

Dear Ms. Cole:

On behalf of our client, Aqua Utilities Florida, Inc. ("AUF"), attached are AUF's responses to customers who attended the Agenda Conference on May 24, 2011, and spoke on billing and water quality issues.

Please acknowledge receipt of this filing by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your consideration and assistance.

Sincerely,

HOLLAND & KNIGHT LLP

D. Bruce May, Jr.

DBM:kjg
Enclosure
cc: Caroline Klancke
Ralph Jaeger
Patricia Christensen
Kenneth Curtin

Kelly Sullivan
Troy Rendell
Kim Joyce

Aqua Utilities Florida, Inc.

Docket No. 100330-WS

PSC Agenda Conference – May 24, 2011

Overview: The PSC Agenda Conference was held on May 24, 2011 and approximately 37 customers provided comments prior to the PSC's consideration of AUF's PAA rate request. AUF's responses to those customers who spoke regarding billing and water quality issues at the Agenda Conference are set forth below.[1]

Benjamin Anderson – 7117 SW Archer Road, Lot 2629, Gainesville, FL – Arredondo Farms

Mr. Anderson raised questions concerning the hardness of the water and his belief that there is calcium in the water. Review of his account shows that Mr. Anderson contacted AUF twice -- on March 28, 2011, and again on April 21, 2011. Mr. Anderson stated that there were deposits in the water and the water was murky.

Mr. Anderson was informed that indigenous constituents in the ground water cause hard water, and that hard water does not pose health issues. Since AUF acquired the Arredondo Farms Water System in 2003, the system has provided water meeting all primary and secondary federal and state drinking water standards. Nonetheless, AUF is evaluating system-level alternatives to address the hardness issue at Arredondo Farms and these alternatives will be presented as soon as the first phase projects of AUF's Aesthetic Water Quality Project have been completed. Some of the options being evaluated at this time include adding a sequestering agent similar to that recently added to the Tangerine and Zephyr Shores water systems. AUF's ultimate goal is to find a balanced solution that will maximize benefits to customers and minimize upward pressure on rates.

Gerald Novak – 4912 Bobby Avenue, Zephyrhills, FL –

Mr. Novak asserted that rates impact property values. A review of AUF records indicates that Mr. Novak is no longer an AUF customer at this address. The account at this address is an inactive account that was turned off in October 2008 when it was discovered water was being used at the property but there was no customer of record.

[1] AUF has not provided responses to those customers who limited their remarks to the amount of the proposed rate increase.

Julie Knox – 35303 Condo Boulevard, Zephyrhills, FL –

Ms. Knox raised a question about two bills that were both due in May, 2011. Ms. Knox receives bills for water and sewer on a monthly basis. Ms. Knox's meter is read at the beginning of each month and payment is due twenty-one days after the bill is issued. Review of Ms. Knox's account shows that her bill was issued on April 7, 2011 for 27 days of service, which bill was due on May 2, 2011. Her next bill was issued on May 5, 2011 for 29 days of service and was due on May 30, 2011. Although Ms. Knox received two bills with due dates in May, she was not double billed for service.

At the hearing Ms. Knox also mentioned an issue with damaged clothing. An AUF representative spoke with Ms. Knox and explained that she could contact the Company to submit a claim for any damaged items.

Please note that Ms. Knox recently filed a complaint with the PSC about her concerns with the water quality. An AUF representative spoke with Ms. Knox on June 15, 2011 to discuss her concerns. She stated that AUF had not yet installed an auto flusher that had been previously discussed. However, it was explained to her that the flusher was still scheduled to be installed and that the installation would be completed on June 21, 2011. Prior to the installation of the auto flusher, AUF was scheduled to flush the line in her area on June 16, 2011. An AUF area coordinator met again with Ms. Knox on June 17, 2011, and the auto flusher has now been installed.

At the meeting on June 15, 2011, Ms. Knox was also informed that AUF would be performing directional flushing for the entire system on July 7, 2011. The homeowner association has requested that the AUF representative attend its next meeting on July 7, 2011, which coincides with the date of the directional flushing to explain the event to the residents. Pursuant to that request, an AUF representative will attend the meeting and will fully explain the flushing program which has been implemented in the Zephyr Shores system.

Janice Ellis – 4600 Clarice Avenue, Zephyrhills, FL

Ms. Ellis discussed an issue that she previously had with AUF in 2009 regarding her claim that water had stained her clothing. After receiving the claim in 2009, AUF provided the customer with Iron Out for the clothing. The customer later advised that the Iron Out did not resolve the issue and AUF paid Ms. Ellis' claim to her for the damaged clothing. The customer has not called AUF since 2009.

Lou Vellei – 7741 Graybirch Terrace, Port Richey, FL

Mr. Vellei asserted that AUF has had 10 rate increases since 2004 and 5 since 2008. Although there have been increases for indexes and pass throughs, AUF has not had 10 rate increases since 2004. AUF's last full rate case in Docket No. 080121-WS was the

first full base rate increase granted by the PSC since 1996. Mr. Vellei mentioned a broken sewer pipe but a review of his account does not indicate any service orders for a broken pipe.

Linda Gadd – 6110 Doe Circle East, Lakeland, FL

Ms. Gadd raised an issue regarding her monthly consumption. She stated that she read her meter on April 29th and again on May 23rd and calculated that she used 495 gallons. Subsequently, AUF has informed Ms. Gadd that she actually uses 5,000 gallons.

A review of Ms. Gadd's account confirms that her monthly usage fluctuates between 4,500 and 6,000 gallons each month. In reading her meter, Ms. Gadd did not account for fact that there is a 0 on the meter dial. Therefore, her usage between April 29th and May 23rd would be 4,950 which is in line with her average monthly consumption.

Ms. Gadd also raised an issue relating to service termination at her property on two occasions and claims that she was not given notice prior to the termination and that AUF took four days to restore her service. A review of Ms. Gadd's account indicates that she was placed into collections for past due balances on two occasions -- once in May 2010 and again in October 2010.

Her service was terminated on May 24, 2010 after she was given written notice on May 7, 2010 that her account was past due. On May 26, 2010, she contacted AUF for the restoration requirements. She was given the restoration requirement of $197.25 and provided locations at which payments could be made. She stated she would call with the confirmation number once it was paid. On May 27, 2010 she called and said she would make a payment at a payment location. She called later the same day and said that she mailed the payment and would call the next day to see if the payment posted. On May 28, 2010 she called to see if the payment she mailed posted to the account. The payment was posted on the account on May 28, 2010 and service was restored that day.

It should be noted that Ms. Gadd filed a complaint with the FPSC concerning the October, 2010 service termination. AUF provided the following information to the PSC on Ms. Gadd's complaint. On October 8, 2010, Ms. Gadd was given a 10 day written notice of termination service for the balance due on her account of $121.60. Subsequently, on October 15, 2010, Ms. Gadd received a call reminding her of her that she needed to make the payment or service would be turned off. On October 22, 2010, the customer's service was terminated for nonpayment. On October 27, 2010, Ms. Gadd telephoned the business office stating her service was terminated. The AUF representative attempted to share steps to have service restored; however, Ms. Gadd was noticeably upset and disconnected the call by hanging up.

On November 3, 2010 Ms. Gadd contacted AUF for the restoration requirements. On November 4, 2010 she called to state that she had paid her past due bill at a payment location and provided the appropriate confirmation information. Her service was restored on November 5, 2010, within 24 hours of notifying AUF of the payment. AUF notes that

there is no requirement in the current PSC rules relating to the timing of restoration of service after a disconnect for nonpayment.

AUF attempted to contact Ms. Gadd via telephone on November 23rd and November 29th to discuss her complaint with the PSC. However, both times voice messages were left. Therefore, a letter was mailed. The PSC closed the complaint on December 10, 2010.

Phyllis Johnson – 5918 Doe Circle West, Lakeland, FL

Ms. Johnson stated that high water bills caused her to stop watering her lawn and that she requested a separate meter for irrigation. However, a review of her account does not show any contact with AUF regarding a high bill or any inquiry regarding an irrigation meter. On June 15, 2011, an AUF representative spoke with Ms. Johnson and discussed the option of an irrigation meter. The customer declined the option of installing an irrigation meter due to the cost.

Gus Alexakos – 4625 Windy Lane, Zephyrhills, FL

On June 14, 2011, an AUF representative spoke with Mr. Alexakos concerning water quality issues and explained that AUF would like to assist with the water issues in his area. AUF notes that it has spoken to Mr. Alexakos numerous times over the past years and has worked closely with him to address any issue he has previously raised. Mr. Alexakos was informed that AUF would be performing directional flushing on July 7, 2011. The AUF representative scheduled a meeting for June 17, 2011 to further discuss Ms. Alexakos concerns.

On June 17, 2011, an AUF area coordinator met with Mr. Alexakos and gave Mr. Alexakos sample water testing bottles in case he experienced discolored water in the future so that AUF could test the samples. In addition, Mr. Alexakos and the AUF representative arranged for AUF to meet with the homeowner's association to discuss the flushing schedule for the upcoming year and any other customer concerns.

The association has requested that the AUF representative attend its next meeting on July 7, 2011, which coincides with the date of the directional flushing to explain the event to their residents. As stated above, an AUF representative will attend that meeting and will explain the flushing program which has been implemented in the Zephyr Shores system.

At the May 24th hearing, Mr. Alexakos mentioned an issue with his neighbor's meter which he said was locked but still registering usage. AUF has investigated the issue and determined that one of AUF's valves was broken at the neighbor's property causing water usage to register. AUF has repaired the valve and subsequently spoke to the neighbor to ensure that the account is credited appropriately.

Deborah DiBona – 10331Willow Drive, Port Richey, FL

Ms. DiBona stated that she has a pool and raised an issue regarding sewer rates. Ms. DiBona is a water and sewer customer. It should be noted that while residential wastewater bills are based on water usage, there is a 6,000-gallon cap on the amount of water used to calculate the wastewater bills for all rate bands. For customers whose typical monthly water usage is below the cap, their water usage sometimes exceeds the cap in those months when their pools are filled, but those customers are not charged for more than the capped amount.

Nancy Jane Kraft – 7905 Mimosa Drive, Port Richey, FL

Ms. Kraft stated that she paid $1,039 for water in 2009. Throughout 2010 her annual bills totaled $1,077 and she has paid $342 so far in 2011. It should be noted these costs are for both water and sewer service, not just water.

Christopher Ruiz – 11124 Tamarix Avenue, Port Richey, FL

Mr. Ruiz raised an issue regarding AUF's boil water notices. A review of his account shows that calls were made to AUF in November 2010 and on May 19, 2011. In November 2010, boil water notices issued to customers and a Swift Reach phone campaign was also initiated for a planned outage for valve replacements. On May 19, 2011, boil water notices were distributed to all customers and rescinded on May 21, 2011.

Lynda Wittkopp – 10531 Azalea Drive, Port Richey, FL

Ms. Wittkopp commented on the water rates and that she uses bottled water. A review of her account shows that her average bill is approximately $56 per month and there have been no water quality or service calls since 2009.

Mike Rock – 7430 Rhineback Drive, Port Richey, FL

Mr. Rock attended the October 20, 2010 customer meeting that was held in New Port Richey. At that time, and again at the PSC Agenda Conference, Mr. Rock inquired as to damage caused due to flooding.

As reported to the PSC after the October customer meeting, on September 13, 2010, Pasco County Utilities hit and broke AUF's 2" line at this address. The County notified AUF and AUF's technician was dispatched. The County fixed the leak and made restoration based on this leak in all areas that were appropriate.

AUF received a Sunshine State One Call document concerning this line break on September 15, 2010. The County commenced the storm water pipe replacement on September 13, 2010, which was two days before AUF received the request for the line

locate. When the AUF service technician arrived to locate and mark the water lines, Pasco County was already in the process of digging the ground for the storm pipe replacement. Again, this was two days prior to AUF receiving the One Call request to locate the line.

Harold Todd – 7831 Judith Crescent, Port Richey, FL

Mr. Todd commented on an issue relating to his granddaughter's service. At the hearing, however, he did not mention the customer's name or address. On June 15, 2010, AUF contacted Mr. Todd's granddaughter and she did not have any current water quality concerns. AUF also asked the granddaughter about the incident referenced by Mr. Todd and the granddaughter did not have details and expressed no concern about past water quality problems.

Marie Skelton – 9438 US 19 #235, Port Richey, FL

Ms. Skelton raised an issue concerning a 2010 backbill as a result of zero usage on the account beginning in May 2009. There was a meter exchange in October 2009 and Ms. Skelton did receive a backbill. However, in accordance with Florida law, Ms. Skelton was not billed for more than 365 days of service. It should be noted that the balance on the account after the revised bill was $200.05.

Ms. Skelton did write to AUF regarding complaints with her Zipcheck bill payments and AUF responded to Ms. Skelton's letter and resolved the issue. The account was abated $3.20 for the Zipcheck fee. After the customer contacted AUF, AUF reviewed her bill and confirmed that Ms. Skelton was billed at the appropriate rates. AUF does not have a record of Ms. Skelton contacting the Company in 2009 about the meter readings.

Diane Manzo – 7932 Lotus Drive, Port Richey, FL

Ms. Manzo attended the October 20, 2010 customer meeting in New Port Richey. At that time, and again at the PSC Agenda Conference, Ms. Manzo discussed her usage variations. As reported to the PSC after the October customer meeting, a review of her usage from January 2009 through November 2010 confirms that her usage has remained relatively constant except for a few months when usage went up. Ms. Manzo asserted that AUF bills in 1,000 gallon increments and stated that she should not be charged for 2,000 gallons if she only uses 1,010 gallons. Ms. Manzo is incorrect. AUF bills in 100 (not 1,000) gallon increments.

Lesley Marano – 7915 Foxbloom, Port Richey, FL

Ms. Marano raised a question regarding a collection issue and claimed that she was told that it would be okay to pay the balance on Friday but her service was terminated on Wednesday. She also discussed a broken pipe in the backyard that she asserts that it took four days to repair. Ms. Marano did not provide an address, but AUF believes that it has identified her account. On November 15, 2010 a notice was sent concerning a past due balance. The customer did call for payment requirements and did make a payment on Wednesday, November 17, 2010, and another payment on Friday, November 19, 2010. A review of the account, however, does not indicate that service was shut off for non-payment on Wednesday, November 17, 2010. Records do show that the customer called about no water on Wednesday, November 17, 2010. On November 17, 2010 there was an outage on the Palm Terrace system due to a broken valve. This was an emergency shut down and water was restored the same day. Although Ms. Marano was without service for a portion of the day on November 17, 2010, it was not due to termination for nonpayment; rather, it was due to an outage in the area at the time.

In May, 2010 there was a broken pipe at the address and a claim was paid to the customer for a broken water heater.

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April 28, 2011

Via Hand Delivery

Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, FL 32399-0850

Re: *In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.*, Docket No. 100330-WS

Dear Ms. Cole:

On behalf of Aqua Utilities Florida, Inc. ("AUF"), enclosed for filing are the original and seven (7) copies of AUF's Response to YES Companies, LLC d/b/a Arredondo Farms' Memorandum in Opposition to Rate Increase Application.

Please acknowledge receipt of this filing by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance.

Sincerely,

HOLLAND & KNIGHT LLP

D. Bruce May, Jr.

DBM:kjg
Enclosures

cc: Caroline Klancke
Ralph Jaeger
Patricia Christensen
Kenneth Curtin
Kelly Sullivan
Kim Joyce
Troy Rendell

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.	)	DOCKET NO. 100330-WS DATED: April 28, 2011

AQUA UTILITIES FLORIDA, INC.'S RESPONSE TO YES COMPANIES, LLC D/B/A ARREDONDO FARMS' MEMORANDUM IN OPPOSITION TO RATE INCREASE APPLICATION

Aqua Utilities Florida, Inc. ("AUF"), by and through undersigned counsel, files its Response to the Memorandum In Opposition to AUF's Rate Increase Application filed by YES Companies, LLC D/B/A Arredondo Farms ("YES") on April 11, 2011. YES' memorandum is a compilation of sensationalized allegations that overlook the facts and the law and obscure the good quality of service at AUF's Arredondo Farms Water and Wastewater Systems ("Systems"). YES' arguments to deny or carve itself out of the rate case are without merit. To set the record straight, AUF states:

I. Overview of the Arredondo Farms Water and Wastewater Systems.

The Systems are located in Alachua County, Florida and currently serve approximately 343 water customers and 328 wastewater customers. Water is provided from two 6-inch wells that were drilled approximately 150 feet deep and have a casing length of 66 feet. Wastewater service is provided by a 60,000 gallon per day extended aeration wastewater treatment plant. All 343 water and 328 wastewater customers served by the Arredondo Farms water and wastewater systems reside in mobile homes located in the Arredondo Farms mobile home park owned by YES. YES acquired the mobile home park on or about January 18, 2008.

The Arredondo Farms water and wastewater systems were originally owned by Arredondo Utility Corporation ("AUC"). After the Commission gained jurisdiction over investor-owned water and wastewater systems in Alachua County in June of 1992, AUC was granted a grandfather certificate. *See* Order No. PSC-92-1454-FOF-WS (Dec. 15, 1992). AUC thereafter applied for and received a staff-assisted rate case wherein rates were set. *See* Order No. PSC-93-0509-FOF-WS (Apr. 5, 1993). In 1996, AUC applied for and received another staff-assisted rate case wherein new rates were set. *See* Order No. PSC-96-0728-FOF-WS (May 30, 1996).

In March of 1999, the Commission approved the transfer of majority organizational control of AUC to AquaSource Utility, Inc. Order No. PSC-01-0631-FOF-WU (Mar. 14, 2001). AUF's parent acquired the Arredondo Farms Systems in 2003 when it acquired the stock of AquaSource Utility, Inc.[1] In 2006, the Commission authorized AUC to operate under the fictitious name of Aqua Utilities Florida, Inc. In 2008, AUF applied for and received a water and wastewater rate increase from the Commission which included the Arredondo Farms Systems. *See* Order No. PSC-09-0385-FOF-WS (May 29, 2009).

II. The Legal Standard for Rate Increases.

YES' memorandum misrepresents the legal standard for rate increases by ignoring Florida's extensive jurisprudence on a public utility's entitlement "to an opportunity to earn a fair or reasonable rate of return on its invested capital." *United Tel. Co. of Fla. v. Mann*, 403 So. 2d 962, 966 (Fla. 1981) (citing *Gulf Power Co. v. Bevis*, 289 So. 2d 401 (Fla. 1974)). Indeed, "[t]he cases universally hold that utility rates, when adopted, must be adequate to produce a reasonable return on capital investment and to meet operating expenses." *Village of Va. Gardens*

[1] The Commission's approval of the acquisition is addressed in Order No. PSC-03-0163-FOF-WS (Feb. 3, 2003).

v. Haven Water Co., 91 So. 2d, 181, 183 (Fla. 1956) (collecting cases). As further explained by the Florida Supreme Court:

> A fair rate of return is for the benefit of the utility's investors. *Gulf Power Co. v. Bevis*, 296 So.2d 482 (Fla.1974). This amount "should be sufficient to assure confidence in the financial integrity of the enterprise, so as to maintain credit and to attract capital." *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591, 603, 64 S. Ct. 281, 288, 88 L.Ed. 333 (1944); *see also Bluefield Waterworks & Improvement Co. v. Public Service Commission*, 262 U.S. 679, 43 S. Ct. 675, 67 L.Ed. 1176 (1923). Therefore the purpose of establishing a fair or reasonable rate of return is to "fairly compensate investors for the risks they have assumed...." *Permian Basin Area Rate Cases*, 390 U.S. 747, 792, 88 S. Ct. 1344, 1373, 20 L.Ed.2d 312 (1968).

Mann, 403 So. 2d at 966. Therefore, refusal to grant a public utility a reasonable rate of return on its investment would be "confiscatory." *Keystone Water Co., Inc. v. Bevis,* 278 So. 2d 606, 609 (Fla. 1973); *see also, N. Fla. Water Co. v. City of Marianna,* 235 So. 2d 487 (Fla. 1970).

YES also fails to mention the due process protections that are afforded to a utility in a proceeding where compensatory rates are to be set. *See City of Miami v. Fla. Pub. Serv. Comm'n,* 226 So. 2d 217, 224 (Fla. 1969) (The determination of whether a public utility is receiving fair and reasonable returns "should be made in accordance with due process of law and in keeping with recognized rules of trial or administrative hearing procedure and practice. In such cases, neither the Commission nor the courts should countenance any harassment of the public utility or the making of it a 'whipping boy' for political or other extraneous purposes.").

As YES acknowledges, in fixing rates that are "just, reasonable, compensatory, and not unfairly discriminatory," the Commission is to consider among other things the "value and quality of the service and the cost of providing the service." § 367.081(2)(a)(1), Fla. Stat. However, YES attempts to heighten this standard by reference to unique utility cases involving

instances of criminal mismanagement or gross neglect which are not remotely at issue here.[2] YES suggests that because rates were reduced or not increased due to the extreme and inapposite facts in those unique cases, the Commission should exercise that same authority here. YES' logic is flawed. A review of the cases cited by YES demonstrates their inapplicability.

For instance, in *Gulf Power Company v. Wilson*, 597 So. 2d 270 (Fla. 1992), the Commission temporarily reduced an electric utility's return on equity ("ROE") after finding criminally corrupt practices and gross mismanagement which "reflect[ed] a disregard for the ratepayers and public service." *Id.* at 272 (quoting Commission's findings). These practices included "theft of company property, use of company employees on company time to perform services for management personnel, utility executives accepting appliances without payment, and political contributions made by third parties and charged back to" the utility. *Id.* Accordingly, the Commission penalized the utility by imposing a penalty of 50 basis points on its ROE "as a message to management" to stop its misconduct. *Id.* Notably, even under these extreme circumstances (which are certainly not present here), the Commission still approved a rate increase and only imposed the ROE penalty for a temporary two-year period.[3]

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[2] To be sure, "[i]f the commission finds that a utility has failed to provide its customers with water or wastewater service that meets the standards promulgated by the Department of Environmental Protection or the water management districts, the commission may reduce the utility's return on equity until the standards are met." § 367.111(2), Fla. Stat. But those are not the facts here.

[3] In implementing its authority to reduce a utility's return on equity the Commission has been careful to limit such reductions to situations where the utility has flagrantly disregarded the Commission's rules and charged unauthorized rates, *see* Order No. PSC-03-0699-SU (June 9, 2003); ignored Staff's request for information, *see id.*; or repeatedly violated FDEP regulations, *see* Order No. PSC-98-0763-FOF-SU (June 3, 1998) (ROE reduced by 100 basis points for poor quality of service and mismanagement, where the utility had not had a single satisfactory field inspection by either FDEP or the Health Department, had received numerous warning letters, failed to perform timely after entering into consent agreements with FDEP, and incurred fines and possible penalties in excess of the value of the utilities planned). There is no evidence in this case, and indeed no claim, that AUF has flagrantly disregarded the Commission's rules, charged unauthorized rates, ignored staff's requests for information, or repeatedly violated FDEP requirements. Indeed, AUF has shown a commitment to taking actions beyond that required by law as described below.

Similarly, in *North Florida Water Company v. Bevis*, 302 So. 2d 129 (Fla. 1974), the Court affirmed the Commission's denial of a rate increase where the Commission had determined that (i) the utility's system was plagued by "insufficient past maintenance," (ii) the utility's system "leak[ed] like a sieve," and (iii) the utility's meter program was "virtually non-existen[t]." *See* Order No. 5853 (Sept. 14, 1973). In so ruling, the Court agreed that the public should not be compelled to pay increased rates due to egregious inefficiencies resulting from the utility's total neglect of the system. 302 So. 2d at 129-130. None of those extreme facts are present here.

Likewise, the administrative order in *Island Services Inc. v. Florida Public Service Commission*, DOAH Case No. 80-1176 (Aug. 6, 1980), involved other issues far beyond what is presented here. *See also,* Order No. 9773 (Jan. 29, 1981) (adopting administrative order). In *Island Services*, it was found that the system was not properly maintained, there were frequent periods of very low water pressure, customers were unable to contact the utility when outages occurred after business hours because no emergency phone number was provided, and that tests by the Department of Environmental Regulation demonstrated inadequate chlorine residuals which would require further monitoring. *Id.* at ¶ 5. The request for the rate increase was further complicated by the fact that there was no basis on which to determine the utility's investment. *Id.* at ¶ 6.

YES' citation to the Commission order in *In Re: Application of Palm Coast Utility Corporation*, Order No. 10463 (Dec. 18, 1981), is no more helpful. In that instance, the Commission granted a rate increase for all customers except for eight single-family residences and one duplex where, for those limited customers, water was found to have an "excessive chlorine taste, offensive odor, and high sodium content." *Id.* at 30. In so ruling, the Commission

found that it was "undisputed" that the quality of water provided to the eight single family residences and the duplex was "of a lesser quality than that received by the main body of customers . . . , especially when the factors of taste and odor are considered." *Id.* This notwithstanding, the Commission conditionally granted a rate increase to that small group of customers once their quality of water was elevated to the quality received by the utility's main body of customers. There is nothing here to suggest that AUF is failing to meet the minimal water quality standards which were not being met in that case. In fact, as is explained below, empirical water quality test results demonstrate that the quality of water supplied at the Arredondo Farms System is good. Moreover, the aesthetic quality of the water at Arredondo Farms actually exceeds the aesthetic standards of other systems that are included as part of the first phase of AUF's secondary/aesthetic water quality initiative.

For these reasons, and for all the reasons set forth below, the cases cited by YES are in no way comparable to the facts at issue here.

III. The Value and Quality of AUF's Water Service are Good.

As prescribed by rule, when determining the quality of service provided by a utility, the Commission shall make this determination based on an evaluation of three separate components of water and wastewater utility operations:

(i) Quality of the utility's product (water and wastewater);

(ii) Operational condition of the utility's plant and facilities; and

(iii) The utility's attempt to address customer satisfaction.

Rule 25-30.433(1), Fla. Admin. Code. As demonstrated below, the quality of AUF's water and wastewater product at the Arredondo Farms Systems is good, as is the operational condition of those Systems. Furthermore, AUF has made, and continues to make, concerted attempts to address customer satisfaction at the Arredondo Farms Systems.

A. The Quality of Water Service is Good.

YES' memorandum is conspicuously silent as to the facts that the Arredondo Farms Water System is current in all of the required chemical analyses and that there are no outstanding enforcement issues. Indeed, YES' memorandum completely ignores empirical test results which demonstrate that the quality of water supplied at the Arredondo Farms system is good.

The U.S. Environmental Protection Agency (EPA) National Primary Drinking Water Regulations set enforceable Maximum Contaminant Levels ("MCLs") for drinking water to protect the public from contaminants that might present some risk to human health. An MCL is the maximum allowable amount of a contaminant in drinking water which is delivered to the consumer. EPA National Secondary Drinking Water Regulations set non-mandatory Secondary Maximum Contaminant Levels ("SMCLs") for 15 other contaminants based on aesthetic considerations such as taste, color and odor. EPA does not enforce these SMCLs. They are established as guidelines to assist public water suppliers in managing their drinking water systems. These contaminants are not considered to present a risk to human health at or below the SMCL. There is no SMCL for hardness. There is a SMCL for total dissolved solids (TDS) at 500 mg/L based largely on taste when the TDS is comprised mainly of salt (sodium and chloride).

AUF is required to regularly monitor for primary and secondary standards. Since AUF acquired the Arredondo Farms Water System in 2003, the System has provided water meeting all primary and secondary federal and state drinking water standards. *See, e.g.*, AUF's Responses to YES' First Request for Production of Documents Nos. 1, 2 and 8. The TDS of the water at Arredondo Farms is 306 mg/L, well below the SMCL. Neither sodium nor chloride are significant components of the TDS in the water at Arredondo Farms. The hardness of the water

in Arredondo Farms is around 320 mg/L as calcium carbonate. This is hard water, but not exceptionally hard for Florida. Contrary to the claims by YES, hard water does not contribute to corrosion and, in fact, protects against corrosion of household plumbing. For example, the most common indicator of corrosivity of water is the Langelier Index (or Saturation Index, SI). Water with a positive SI (like the water at the Arredondo Farms System) has a tendency to deposit a protective layer of calcium carbonate and other minerals that inhibit corrosion of metal pipe and plumbing fixtures. Water with a negative SI has a tendency to dissolve calcium carbonate and other metallic oxides and complexes that form on the metal surfaces, exposing the metal surface to corrosion.[4]

The Commission has consistently recognized that it is not unusual for Florida water utilities to experience water "hardness" issues, and the Commission has not taken punitive actions against utilities that do.[5] Indeed, in the 1996 rate case involving the Arredondo Farms Systems (which were then owned by AUC), the Commission expressly found that, while the water at the system was hard, it did not present a health hazard. *See* Order No. PSC-96-0728-FOF-WS at 2-3. The Commission went on to conclude that the "treated water provided by Arredondo meets or exceeds all requirements for safe drinking water" and that the utility had satisfactory water quality. *Id.* The Commission also warned that a system-level solution to the "hard" water issue at Arredondo would not be cost-effective or prudent:

> Those customers who attended the customer meeting were primarily concerned about mineral deposits on their kitchen and bath fixtures. This situation is generally treatable by lime softening. However, the cost to install lime softening equipment is from approximately $80,000 to $140,000 for each of the two water treatment plants. This cost would be passed on to the customers through their rates. We find that this solution would not be cost

[4] Vernon Snoeyink & David Jenkins, *Water Chemistry* 289 (1980).
[5] *See, e.g.*, Order No. PSC-00-2054-PAA-WS (Oct. 27, 2000); Order No. PSC-96-0728-FOF-WS (May 30, 1996); Order No. PSC-93-0027-FOF-WS (Jan. 5, 1993).

> effective or prudent for this customer base. We note that customers who find the scaling problem to be intolerable have other options. They could either have a local water softening company install a water softening unit at a variable price, or they could purchase a whole house filter system for less than $50.00. Filter cartridges are replaced as necessary and can be purchased to screen for a variance of compounds, including excessive minerals. . . . All things considered, we find that the utility's quality of service is satisfactory.

Id. at 3 (emphasis added).

Although the Commission has previously warned that a system-level solution to the "hard" water issue would not be cost-effective or prudent, the record should be made clear that that AUF continues to try to actively address its customers' concerns regarding hard water. AUF's service technicians are trained to routinely advise customers that the effects of hard water can be mitigated by a variety of household products or by homeowners softening their water. Furthermore, for customers who consider obtaining water softeners, AUF recommends softening only the hot water to maximize benefits and minimize the cost of softening. AUF also regularly includes written materials in customers' bills that explain how to mitigate the effects of hard water. As described below, AUF's efforts to address hard water concerns have not stopped there.

Hard water is an aesthetic water quality issue, and AUF is proud of its proactive programs in Florida to address aesthetic quality. As the Commission knows, in early 2009, AUF evaluated several of its water systems as candidates for investigation for improvements to address secondary (aesthetic) water quality parameters. The Arredondo Farms Water System was one of the systems considered based solely on the relative hardness of the water. There was no other primary or secondary water quality issue with the water at Arredondo Farms. AUF worked with the Commission and the Office of Public Counsel ("OPC") to determine which

systems would be targeted in the first phase of the secondary water quality projects and which would be targeted for subsequent phases. Ultimately, priority was given to systems with SMCL exceedances for taste and odor (due mainly to hydrogen sulfide), iron or manganese, especially where a system could have issues with primary drinking water standards. Because the Arredondo Farms Water System had no SMCL exceedances and no issues related to primary standards, it was placed in the next tier of systems to be addressed in the second phase of AUF's aesthetic water quality program.[6] System-level alternatives to address the hardness at Arredondo Farms are being evaluated and will be presented as soon as the first phase projects have been completed. Some of the options being internally evaluated at this time include adding a sequestering agent, similar to those recently added to the Tangerine and Zephyr Shores water systems during the first phase of the secondary water quality project. AUF's ultimate goal is to find a balanced solution that will maximize benefits to customers and minimize upward pressure on rates.

B. The Quality of Wastewater Service is Good.

YES' memorandum completely ignores undisputed facts showing that AUF provides good quality of wastewater service at Arredondo Farms. First, YES completely ignores the fact that the Arredondo Farms Wastewater Treatment Facility ("WWTF") is currently operating in accordance with all applicable environmental standards, and there are no outstanding enforcement issues. Second, YES fails to mention that, subsequent to AUF's last rate case, AUF has made significant upgrades to the WWTF which were completed and placed into service in August 2010 at a cost of $291,870.[7] (In addition, it should be noted that during the construction

[6] In addition to the Arredondo Farms Water System, AUF has also preliminarily included Hermit's Cove, River Grove and Arredondo Estates in the second phase of its aesthetic water quality program.
[7] The factual details and the costs associated with the WWTF upgrade are set forth in AUF's Sixth Supplemental Response to Staff's Second Data Request dated February 28, 2011.

of the WWTF upgrade, AUF's contractor advised the potential development of a sinkhole. AUF hired Devoe Engineering to perform a site assessment and the sinkhole was stabilized. However, another sinkhole developed, which AUF stabilized at a cost of $47,137.) FDEP issued a clearance letter regarding this project on August 27, 2010. Third, YES ignores that AUF has completed a pond rehabilitation project at the Arredondo WWTF to improve percolation rates. This project was completed in November 2010 at a cost of $127,765.

Finally, AUF continues to incur substantial operational costs at the Arredondo Wastewater System because of fats, oils, grease and other materials disposed of in the sewer system by customers who are tenants of YES. AUF has been working with YES to address some of these wastewater issues, and AUF appreciates YES' cooperation in taking these steps to mitigate the wastewater rate increase.

Clearly, AUF's actions demonstrate that it offers good quality wastewater service at Arredondo Farms and is committed to maintaining that good quality of service going forward.

C. The Quality of AUF's Billing Services is Good.

YES claims that AUF has poor billing practices, which YES blames on AUF's water meters. *See* YES' memorandum at 13. AUF strongly disagrees with YES' claims about billing errors. There simply is no evidence to suggest that AUF's meters are causing billing errors. Such claims ring particularly hollow when one reflects on the fact that the Commission recently affirmed the accuracy of AUF's meters based on an independent meter audit conducted by staff, which audit included random sampling of meters at Arredondo Farms. The Commission expressly found that:

> Our staff has randomly sampled 358 meter readings taken by AUF and compared those readings to a corresponding set of meter readings taken by Commission staff. Of these 358 meter readings taken by AUF, none were found to be significantly different from

> the meter readings taken by our staff. Therefore, we find that no further testing of AUF's meter reading accuracy is necessary.

Order No. PSC-10-0297-PAA-WS (May 10, 2010).

Furthermore, YES' unfounded claims of metering deficiencies ignore AUF's proactive efforts to address the metering issues in the Arredondo Farms area that existed prior to AUF acquiring the Systems. For example, in the 1996 rate case involving the Arredondo Farms Systems, customers had expressed concern that the prior owner - AUC - had an inconsistent policy of meter reading. At that time, AUC explained that when meters were not read it was "because those meters are within fenced yards where the gate is locked, or the yards contained unrestrained dogs, or there is too much debris covering the meter." Order No. PSC-96-0728-FOF-WS at 4. AUF has proactively addressed this issue by installing radio frequency ("RF") meters as a consistent, cost-effective, and accurate means to measure and bill for water service.

On page 14 of its memorandum, YES makes reference to seven customers who have received backbills, and erroneously claims that those isolated instances reflect systemic billing problems. That simply is not true. As will be explained in detail below, YES overlooks the fact that AUF's backbilling practices comport with the Commission's rules and its Commission-approved Tariff. Furthermore, the customer scenarios which YES cites are not indicative of chronic billing problems, but rather reflect routine billing challenges that can arise where there is damage to metering equipment, repeated "move-ins/move-outs" and customer billing address changes. Each of the seven customer scenarios referenced in YES' memorandum is addressed and explained in Exhibit "A".

1. AUF's Policy for Billing for Past Usage Complies with Commission Rules.

The Commission's rules expressly authorize AUF to backbill customers:

> A utility may not backbill customers for any period greater than 12 months for any undercharge in billing which is the result of the utility's mistake. The utility shall allow the customer to pay for the unbilled service over the same time period as the time period during which the underbilling occurred or some other mutually agreeable time period. The utility shall not recover in a ratemaking proceeding, any lost revenues which inure to the utility's detriment on account of this provision.

Rule 25-30.350, Fla. Admin. Code. Rule 25-30.350 is virtually identical to the Commission's rules that authorize backbilling by electric utilities - Rule 25-6.106, Florida Administrative Code,[8] and by natural gas utilities - Rule 25-7.0851, Florida Administrative Code. AUF's backbilling practices also comply with Rule 25-30.350 and with Sections 23, 24 and 30 of its Commission-approved Tariff.

Both Rule 25-30.350 and AUF's approved Tariff allow AUF to backbill for up to 365 days. Thus, when AUF revises a bill to send to a customer to account for services used but not previously billed, the bill will be calculated based on the total amount of usage measured through the meter for the total time that service was received. If this time frame is longer than 365 days, AUF's policy is to include an adjustment on the bill that will credit the customer for usage beyond the 365 day look-back period. AUF's practice is designed to ensure that the backbilled period does not exceed 12 months. Furthermore, AUF's policy is to allow the customer to pay the backbill over the same time period in which the underbilling occurred or some other mutually agreeable time.

While AUF strives for perfection in its billing processes, it would be disingenuous to suggest that mechanical and human errors do not occur. The Commission has recognized this potential for billing mistakes as so have the courts. As set forth above, the Commission's rules

[8] The Commission's rules concerning backbilling by electric utilities also authorize a utility to backbill for "up to four (4) years if the backbilling is necessary due to errors of an electrical contractor." *See*, R. 25-6.103(7), Fla. Admin. Code.

clearly recognize that, from time to time, billing mistakes will be made which will require the utility to backbill customers for service that was provided and used but was not captured in the normal monthly bill. The rationale for backbilling was clearly set forth in *Corporation de Gestion Ste-Foy, Inc. v. Fla. Power & Light,* 385 So. 2d 124 (Fla. 3rd DCA 1980). There the court found that a public utility "is not only permitted but is required to collect undercharges from established rates, whether they result from its own negligence, or even from a specific contractual undertaking to charge a lower amount." *Id.* at 126. The court explained that it would be improper for a utility to give preferential treatment or to charge one customer less than another customer for the same service. *Id.* The Florida Supreme Court later endorsed this principle when it expressly upheld the right of a water utility to backbill for water undercharges. *Jacksonville Elec. Auth. v. Draper's Egg & Poultry Co.*, 557 So. 2d 1357 (Fla. 1990).

In similar fashion, the Commission has expressly recognized the right of a water and wastewater utility to backbill customers pursuant to Rule 25-30.350. *See, e.g.,* Order No. PSC-94-0210-FOF-WS (Feb. 24, 1994); Order No. PSC-94-0501-FOF-WU (Apr. 27, 1994). Furthermore, the Commission has clearly explained the reason why a utility is entitled to backbill as follows: "regardless of whether the utility was aware of the connection or not, the customer has received service for which it has not paid." Order No. PSC-94-0210-FOF-WS.

In the water and wastewater industry the need to backbill is not uncommon and can happen for a variety of reasons. Some examples of these circumstances are as follows:

The Damaged ERT

Where the electronic radio transmitter ("ERT") component of an RF meter is damaged (*e.g.*, by weather event or vandalism) the meter reads will be captured but not transmitted, and thus the customer will be billed only for the relevant base facility charge. When this "no

consumption" issue[9] is detected and the ERT is repaired, AUF's billing system will retrieve the actual read for the consumption and will backbill the customer for the full services provided over the period that the customer was undercharged but not longer than 365 days. This is in strict accordance with the Commission's backbilling rule - Rule 25-30.350. Under AUF's policy, the new bill should spread the total usage over the period of months that the customer was undercharged based on the appropriate rate tier. Furthermore, AUF's policy is to allow the customer to pay the backbill over the same time period in which the underbilling occurred or over some other mutually agreeable time.

Repetitive Billing Address Changes and Move-Ins/Move-Outs

A customer's repetitive changes in his or her billing address can also result in the customer "missing" bills which, in turn, requires the utility to backbill for services rendered but not paid for by the customer. In addition, the potential for billing issues may increase where a customer repeatedly moves in and out of AUF's billing system which causes constant changes in the customer account database. If an underbilling is detected in these scenarios, AUF's policy is to backbill the customer for the services provided over the period that the customer was undercharged but not longer than 365 days. Under AUF's policy the new bill should spread the total usage over the period of months that the customer was undercharged based on the appropriate rate tier. Furthermore, AUF's policy is to allow the customer to pay the backbill over the same time period in which the underbilling occurred or over some other mutually agreeable time.

[9] YES insinuates that AUF should automatically treat a bill with "no consumption" as problem needing immediate attention. That simply is not the case. YES fails to understand that, due to the seasonal nature of many of Florida's residents, it is not unusual during many months of the year for a bill to have only a base facility charge, and no usage charges (i.e., "no consumption").

2. YES' Cherry Picking Argument Should be Rejected.

Since AUF's last rate case in Docket No. 080121-WS, AUF has issued over 12,300 bills to customers in Arredondo Farms. YES lists 7 of those customer bills and attempts to argue that those bills show systemic billing problems. YES' argument is classic "cherry picking" and reflects the fallacy of incomplete evidence. As the Commission and the Courts have recognized, billing mistakes will occur in the ordinary course of a utility's business, and those mistakes may require the utility to backbill customers for service that was provided and used but was not captured in the normal monthly bill. As discussed above, such billing mistakes sometimes occur where there is damage to an ERT or a meter, where customers repeatedly move in and out of the billing system, and where the customer repeatedly changes his or her billing address. Of those 7 customer bills listed by YES: 4 involved backbills because of a damaged ERT or a replaced meter; 2 involved backbills because of move-ins/move-outs; and 1 involved a backbill because of repeated changes in the customer's billing address. Simply put, the 7 customer scenarios listed in YES' memorandum all involved isolated billing mistakes that, despite AUF's best practices, occur in the ordinary course of a utility's business. None reflect chronic or systemic billing problems. Each of the 7 customer billing scenarios listed by YES are addressed and explained in Exhibit "B".[10] Furthermore, as shown in Exhibit "A", AUF has made a concerted effort to address each of these customer's concerns.

D. AUF Has Designed Rates Specifically to Address Affordability.

YES claims that AUF's proposed rates are unjust, unreasonable and unaffordable. Those claims are without merit. As explained above, AUF is entitled to rates that allow it the

[10] The exhibits to YES' memorandum make passing reference to five (5) other customers who have expressed concerns with respect to the level of bills that did not relate to backbilling. Each of those customer scenarios are addressed and explained in Exhibit "B". Furthermore, as shown in Exhibit "B", AUF has made a concerted effort to address each of these customer's concerns.

opportunity to earn a reasonable return on its prudent capital investment and to recover its reasonable operating expenses. To ensure that its rates are affordable, AUF has requested that the Commission approve a statewide uniform rate structure which, if approved, would actually decrease water rates for customers in Arredondo Farms. While those customers would see a modest increase in wastewater rates, that increase is directly attributable to the substantial investments made by AUF to upgrade the Arredondo Farms WWTF. *See* Section III.C. above. The Commission has already allowed electric and natural gas utilities to implement uniform rates to address affordability concerns. Moreover, the Florida First District Court of Appeal ("1st DCA") has made it clear that there are no legal impediments to the Commission adopting a similar uniform rate structure for multi-system water and wastewater utilities like AUF. *See S. States Utils. v. Fla. Pub. Serv. Comm'n.*, 714 So. 2d 1046 (Fla. 1st DCA 1998). In fact, the court recognized that uniform rates for water and wastewater utilities can enhance affordability for all customers by providing bona fide cost savings "due to a reduction in accounting, data processing and administrative expenses." *Id.* at 1052 (quoting Order No. PSC-93-1480-FOF-WS (Oct. 11, 1993)).[11]

Finally, YES' attempt to compare AUF's proposed rates to rates of Gainesville Regional Utilities is baseless and contrary to Commission precedent. The Commission has expressly rejected a similar attempt by OPC to compare an investor-owned water utility's rates to rates of a municipally-owned utility:

> A valid comparison would take into account all differences and similarities of the utilities whose rates were being compared. One example of a major consideration is the type of ownership. The rates of a municipally-owned utility may vary greatly from those of

[11] The 1st DCA also recognized that the Commission has set uniform rates in several other cases involving multiple water and wastewater systems. 714 So. 2d at 1052 (citing Order No. PSC-93-1092-FOF-WU (July 27, 1993); Order No. 23592 (Oct. 9, 1990); Order No. 14506 (June 26, 1985); Order No. 11507 (Jan. 13, 1983)).

> an investor-owned utility. For instance, municipally-owned utilities generally have lower costs of debt and often subsidize their water and sewer systems through taxation. On the other hand, investor-owned utilities are required to pay property and income taxes. These utilities usually have a much higher cost of debt because they do not have the same access to federal and state funds as do municipalities. Other components that may impact on the cost and pricing of water and sewer service include the number of customers served and the age of the plant.
>
> The Commission has previously addressed this issue. For example, by Order No. 4137, the Commission found that rate comparisons are without value as a measure of reasonableness in fixing telephone rates within a specific area and for a particular utility. The Commission observed in that case that if such comparisons were a valid test of reasonableness, there would be only one rate for a given service throughout the jurisdiction, regardless of the utility involved or the operating conditions encountered. We therefore find that, based on the record, the rate comparison proposed by Public Counsel is irrelevant to our disposition of this rate case.

Order No. 20066 (Sept. 26, 1988).

IV. Conclusion.

The Commission should not be misled by YES' sensationalized allegations, which overlook key facts and legal precedent. The Commission has previously found the quality of service at the Arredondo Farms Water and Wastewater Systems to be satisfactory. Order No. PSC-96-0728-FOF-WS, *supra.* Since that time, the facts show that the service quality has improved. With respect to Arredondo Farms Water System, the undisputed facts show that since AUF acquired the system in 2003, the water has met all primary and secondary federal and state drinking water standards, and there are no outstanding environmental enforcement issues. Similarly, AUF has made substantial improvements to the Arredondo Farms Wastewater System, which is currently operating in accordance with all applicable environmental standards and there are no outstanding enforcement issues. Furthermore, there is nothing wrong with the quality of AUF's billing services. The Commission has recently affirmed the accuracy of AUF's meters

based upon an independent meter audit conducted by staff. Moreover, AUF's backbilling practices are entirely consistent with its approved Tariff, the Commission's rules, and the backbilling policies previously upheld by the Courts and the Commission. Finally, AUF has made and continues to make concerted efforts to address customer satisfaction. Although the Commission has previously determined that water hardness at Arredondo Farms is an aesthetic issue and not a health compliance issue, and has warned that system-level improvements to address hard water would not be cost-effective or prudent, AUF has not ignored the issue. AUF continues to try to actively address its customers' concerns by including written materials in customers' bills and by training its service technicians to routinely advise customers on how to mitigate the effects of hard water. In addition, AUF has proactively included the Arredondo Farms Water System in the next phase of its aesthetic water quality program and continues to evaluate cost-effective solutions to address hard water.

In summary, the overall quality of service provided by AUF at the Arredondo Farms Systems is good. YES' arguments to deny or carve itself out of the rate case are without merit.

Respectfully submitted this 28th day of April, 2011.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was furnished by hand delivery or overnight mail** this 28th day of April, 2011 to:

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EXHIBIT A

Monica Thomas

Ms. Thomas' scenario involved a backbill due to a move-in issue. The customer contacted AUF on March, 18, 2008 to have service put in her name. At the time of this move-in notification, the property was not identified as a wastewater account in AUF's billing system. Consequently the customer began receiving water and wastewater service in March of 2008, but was billed only for water service. Upon learning of the undercharge in October 2010, AUF backbilled the customer for wastewater service back to September 2009, consistent with Rule 25-30.350. Although Ms. Thomas had received wastewater service since March 2008, AUF did not charge her for such service she received for the period March 2008 to September 2009.

Ms. Thomas' bill for the prior wastewater service specifically notified her that the bill was for a long period and that payment arrangements could be made on the account. AUF's policy is to encourage and allow payment plans, and Ms. Thomas was notified that a payment plan was available to her.

Eugene Davis

Mr. Davis' scenario involved a backbill due to a move-in issue. The customer contacted AUF on August 28, 2007 to activate service. At the time of move-in notification, the property was not identified as a wastewater account in AUF's billing system. Consequently Mr. Davis began receiving water and wastewater service in late August 2007, but was billed only for water service. Upon learning of the undercharge in September 2010, AUF backbilled the customer for wastewater service back to September 2009, consistent with Rule 25-30.350. Although Mr. Davis received wastewater service since late August 2007, AUF did not charge him for such service he received for the period August 2007 through September 2009. Mr. Davis' bill for the prior wastewater service notified him that the bill was for a long period and that payment arrangements could be made on the account. This customer continues to make payments on his prior usage pursuant to a payment arrangement plan.

Katherine Smith

Ms. Smith's scenario involved a backbill due to a damaged ERT issue. As explained in Section III of the Response, where the ERT component of an RF meter is damaged (e.g., by weather event or vandalism) meter reads will be captured but not transmitted, and thus the customer will be billed only for the relevant base facility charge. When this issue is detected and the ERT is repaired, AUF will retrieve the actual read for the consumption and will backbill the customer for the full services provided over the period that the customer was undercharged but not longer than 365 days. This is in strict accordance with the Commission's backbilling rules. Furthermore, the bill should show the recalculated usage by month based on the appropriate tiered block rate structure. In Ms. Smith's case, when AUF detected that the ERT had been damaged and the customer had not been billed for usage for 361 days, it attempted to manually address the billing issue. As a result of human error, the manual override caused the customers' usage over the 361 day period (33,800 gallons) to be billed in a 28 day period. The customer's

revised bill, which was issued February 2011, thus reflected usage at the highest tier rate. Upon learning of this mistake, a corrected bill has been issued for the unbilled gallonage which has been spread over the 361 day period with the appropriate rate tier applied. AUF has also notified the customer that a payment plan is available to her.

Justin Houlker

Mr. Houlker's scenario involved a backbill due to a damaged ERT issue. Because of a damaged ERT, Mr. Houlker was not billed for water and wastewater services used from November 2009 to November 2010. A service technician discovered that the ERT was damaged and promptly repaired the ERT on November 24, 2010. In December 2010, the customer was backbilled for the unbilled service in accordance with the Commission's rules. The bill reflected usage calculations for the total time period that service was received but not billed (378 days). However, because the Commission's rule limits the backbill period to not more than 365 days, AUF's bill reflected a credit which credited Mr. Houlker's bill for usage beyond the 365 day period. AUF has notified the customer that a payment plan is available to him.

William Wright

Mr. Wright's scenario involved a backbill which was due to a damaged ERT issue. Mr. Wright has been a customer since 2001. In 2009, he began receiving a bill which contained only water and sewer base facility charges (with no usage charges) due to a damaged ERT.

The account was corrected and the customer was billed for 99,300 gallons of usage for 567 days of service. Because Florida's regulations state that Aqua can only back bill for 365 days of service, a credit was posted to the customer's account for the usage over 365 days. AUF has also notified the customer that a payment plan is available to him.

Joyce Helm

Ms. Helm's scenario involved a backbill due to repeated billing address changes requested by the customer. Records indicated that Ms. Helm called AUF on February 2, 2010 to activate her account, stating that she moved into the property on January 28, 2010. Between March 2, 2010 and April 22, 2010, the customer contacted AUF and stated that she had not received her bills. AUF sent the customer duplicates of the prior bills. Thereafter, at the customer's request, AUF changed the customer's billing address. On May 18, 2010 Ms. Helm called AUF and claimed that she was not a customer (Note that AUF's records show the Company received 2 credit card payments both in April 2010 showing Joyce Helm as the customer of record). Ms. Helm said that she did not live in Gainesville, that she lived in Titusville, Florida and that service should be taken out of her name. Pursuant to Ms. Helm's request, AUF took the service out of Ms. Helm's name at this property.

On June 28, 2010, after AUF's records indicated that there was consumption at the property but no customer of record, a service order was created to turn off and block service to this property. Ms. Helm then called in August 2010, asserting that she was not receiving bills for the 7171 Southwest Archer Road, Gainesville, Florida property.

The AUF representative advised Ms. Helms that she had previously stated that she did not live at the property and AUF's records indicated that there was no active customer at the property at that time. After speaking with Ms. Helm, the customer service representative put the service back into Ms. Helm's name. Because records indicated that she or someone authorized by her was using water and wastewater services at the property since she initially called and stated she had moved into the property, she was billed for the service used at this address as of January 28, 2010. Specifically, Ms. Helm was billed for 196 days of service. Ms. Helm raised this billing concern at the customer meeting in Gainesville on October 21, 2010 and spoke to a local AUF representative. As a one-time courtesy, a credit of $318.56 was issued on the customer's account on October 22, 2010.

MaryAnn Walker

MaryAnn Walker's scenario involved a backbill due to a damaged meter issue. A brief history of Ms. Walker's account is as follows: Ms. Walker became an AUF customer at this address in March 2008. While she was a customer, this customer had numerous collection and payment issues which led to her service being discontinued in April 2009 for non-payment. In May 2009 AUF noticed that there was consumption but no customer of record at this property. On September 4, 2009, service was put back into Ms. Walker's name and a backbill was issued back to April 8, 2009 for services used but not paid for by the customer. Thereafter, Ms. Walker agreed to a payment plan to pay for the services she used but did not pay for.

On October 22, 2010, AUF determined that the meter at Ms. Walker's property was damaged, and thereafter the Company took prompt steps to exchange the meter. It was further determined that Ms. Walker had not been billed for usage from October 2009 through October 2010. The meter exchange was completed on October 22, 2010. As a one time courtesy, Ms. Walker was not billed for water and wastewater consumption from October 2009 to October 2010.

However, during the meter exchange on October 22, 2010, the service technician did not synchronize the new meter with the existing ERT. The technician's failure to synchronize the new meter with the ERT, which was contrary to AUF's training protocol, resulted in meter reading errors which were reflected in Ms. Walker's November and December bills. On January 5, 2011, an AUF field technician spoke with Ms. Walker, who inquired about her bill. AUF immediately reviewed the bill and issued a new bill on January 6, 2010 correcting the mistake. AUF also offered Ms. Walker a payment arrangement which was never accepted. Ms. Walker is no longer an active customer.

EXHIBIT B

Beverly Jane Turner

Ms. Turner asserts that she current pays $118 - $128 per month. She states that several months ago, she had an unexplained charge on her bill. Upon a review of her bills, she has recently been charged a late payment fee and a deposit and reconnection fee in February 2011 due to a shut off for non payment in January. The current balance is $104.07. Her typical monthly bill, without late fees, averages less than a $100 for both water and wastewater service.

Lola Ferguson

Ms. Ferguson incorrectly asserts that AUF improperly shut off her water. The facts of this account are as follows: The customer had a history of delinquent payments. A shut off notice was sent to the customer on February 11, 2010, requiring payment of $416. When the customer failed to make the required payment in full, the service was discontinued and the account was closed on March 4, 2010. In April 2010, AUF's records showed consumption at the property, which indicated that someone had broken the lock and turned the water back on. In April of 2010, the customer made partial payments but did not make payments sufficient to reinstate service. Ultimately, the customer paid the required charges and service was reinitiated on May 3, 2010. Over the past 2 years, there have been approximately 25 service orders generated to this account, virtually all involving collections issues, move-in/move-out activities, and indications of consumption when the property was supposed to be "inactive."

It should be noted, that when the customer states she called in April 2010 regarding sand in her line, it was during the time period when she was "inactive with consumption" and receiving service but was not an active customer.

Teresa Jarvis

Ms. Jarvis' bills for monthly water and wastewater service average approximately $90 per month. Review of her bill history shows that her payments tend to run a month behind, resulting in late charges and past due amounts which are reflected on the bill in accordance with AUF's Commission-approved Tariff.

Michelle Einmo

This billing issue arose in 2007 and has already been addressed in AUF's last rate case in Docket No. 080121-WS. Since that time, the customer's bills are correct. Recent collections notices and calls are not at all connected to the 2007 issue, but instead relate to her current balance which has been past due.

Virginia Witt

Ms. Witt is complaining about her June 2010 bill with 4,600 gallons of usage. Review of Ms. Witt's billing history shows that Ms. Witt's usage fluctuates. For example, in June of 2008 she used 7100 gallons. On August 17, 2010 an AUF service technician went to the property and verified the meter information and confirmed that there were no leaks. Ms. Kurz's assertion that she checked Ms. Witt's meter and "it was not moving" is to be expected where there are no leaks at the property.

Kathleen Delano

Ms. Delano initiated service in July 2010. Her average consumption is 5,600 gallons per month and her monthly bills average approximately $150 per month. Her last bill was for $136.17, though she is carrying a prior balance which makes her total bill $231.45. Her average bill without any prior balance or late fees is not $180-200 per month.

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February 28, 2011

Via Hand Delivery

Ms. Ann Cole
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, FL 32399-0850

Re: *In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.*, Docket No. 080121-WS

Dear Ms. Cole:

Pursuant to Order No. PSC-10-0297-PAA-WS, enclosed for filing are the original and four (4) copies of Aqua Utilities Florida, Inc.'s Final Phase II Quality of Service Monitoring Report ("Final Report"). Also included for your convenience is a CD containing the electronic Word version of the Final Report without attachments.

Please acknowledge receipt of this filing by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance.

Sincerely,

HOLLAND & KNIGHT LLP

J. Bruce May Jr.

D. Bruce May, Jr.

COM ___
APA ___
ECR 3+1CD containing same.
GCL 1
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SSC ___
ADM ___
OPC ___
CLK ___

DBM:kjg
Encls.

cc: Ralph Jaeger, Esq. (w/enclosure)
Patricia Christensen, Esq. (w/enclosure)
Cecilia Bradley, Esq. (w/enclosure)
Kimberly A. Joyce, Esq.
Troy Rendell

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.	DOCKET NO. 080121-WS FILED: February 28, 2011

FINAL PHASE II QUALITY OF SERVICE MONITORING REPORT

OF

AQUA UTILITIES FLORIDA, INC.

Table of Contents

I. Background

A. The Prior Rate Case

Aqua Utilities Florida, Inc. ("AUF") is a wholly-owned subsidiary of Aqua America, Inc., one of the largest publicly traded water and wastewater utilities in the United States with operations in 13 states. AUF began doing business in Florida in 2003 and, since that time, has acquired a number of water and wastewater utilities throughout the state. AUF currently operates 109 water and wastewater utility systems in Florida, 101 of which are under the jurisdiction of the Florida Public Service Commission ("FPSC" or "Commission"). Currently, AUF has FPSC jurisdictional systems in the following Florida counties: Alachua, Brevard, Desoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington. At the time AUF acquired these systems, the vast majority had not had a rate case or undergone system improvements for many years. Therefore, in order to continue to make needed system improvements and to maintain its financial integrity, AUF sought rate relief from the Commission in 2008. See FPSC Docket No. 080121-WS.

After conducting a formal hearing, the Commission ultimately granted rate relief for all of AUF's systems, except for the Chuluota water and wastewater systems. Order No. PSC-09-0385-FOF-WS issued May 29, 2009 ("Final Order").

B. Initial Monitoring Plan (May 2009 through October 2009)

In addition to granting rate relief, the Final Order established a monitoring plan ("Initial Monitoring Plan") to enable the Commission to monitor AUF's customer service

in three areas: the general handling of customer complaints, the specific handling of complaints at AUF's call centers, and the accuracy of AUF's metering readings and resulting bills. The Commission's Initial Monitoring Plan required AUF to file the following information for the six-month period from May 2009 through October 2009:

> 1. AUF shall submit a monthly report to this Commission for the first six months after this order is issued. The report will list all customer complaints for each system for the month. The report shall include the customer name, address, phone number, account number, a description of the complaint, and how the complaint was resolved. We will audit a sample (sample will be chosen to determine with a 90 percent confidence level and a maximum error rate of 5 percent) of the reported customer complaints to determine whether the complaints were resolved appropriately ("appropriately" will be defined as any errors made by AUF are corrected and all issues in the complaint are addressed).
>
> 2. AUF shall submit to this Commission on a monthly basis all sound recordings of customer complaints from customers to this Commission for the first six months after this order is issued. Our staff will listen to a sample of these to determine if the customer complaints are handled in a professional and courteous manner.
>
> 3. AUF will provide our staff with route schedules that identify the day that meters will be read for AUF's regulated systems for the six months after this order is issued. The route schedules will be due to our staff by May 1, 2009. AUF shall also provide staff with the meter reading logs for the same six-month period. Based on the meter reading schedule, our staff will manually read a sample of AUF's meters on the same day that the Utility is scheduled to read them to verify the accuracy of the meter readings and resulting customer bills.
>
> Upon the completion of these reporting requirements, our staff will present their conclusions regarding AUF's performance to us. If AUF is not performing adequately, we may initiate show cause proceedings, or take such other action as we may deem appropriate.

Final Order at p. 22.

AUF complied with the Commission's Initial Monitoring Plan in all respects. During that six month monitoring period, AUF timely submitted extensive complaint logs for each month. The logs listed all customer complaints for each system for the month and, in accordance with the Commission's directives, set forth (i) the customer name, address, phone number, account number;[1] (ii) described the nature of the complaint; and (iii) reported on how the complaint was resolved. In addition, AUF recorded each and every customer call it received at its call centers from Florida customers and provided those sound recordings to Commission staff on a monthly basis during the entire monitoring period. In this way, the Commission staff was able to objectively review first-hand all customer calls to determine the quality of service provided by AUF's customer service representatives ("CSRs"). AUF also provided Commission staff with all of its meter reading route schedules for the entire six month monitoring period along with the actual meter reading logs for all of those systems for each month during the monitoring period. Commission staff, in turn, personally visited AUF systems soon after AUF's meter readers had completed their reads and documented the usage on the meter. Commission staff compared its volumetric reads to the AUF meter reading log to independently test for meter accuracy. Commission staff further audited AUF customer bills with the meter reading information to test for billing accuracy.

[1]Because the Commission directed AUF to provide proprietary customer specific information, AUF was required to request confidential classification of that information to prevent identity theft and other harm to the customer.

Although the above reporting requirements were extensive and required many hours of the utility's time, not once did AUF miss a reporting deadline or request that any reporting deadline be extended.

During the course of Initial Monitoring Plan, Commission staff thoroughly evaluated all of the monthly reports and data provided by AUF, and conducted its own independent analysis of AUF's quality of service. At the end of that intensive independent review process, Commission staff filed a nineteen page recommendation on March 4, 2010, which concluded:

> Based on staff's review of AUF's processes for handling customer complaints, meter reading, and customer billing, as well as its environmental compliance, staff recommends that AUF's performance as specified in the Monitoring Plan detailed in the Final Order is **adequate**.

Staff Recommendation at p. 13 (emphasis added).

On March 16, 2010, the Commission considered staff's recommendation at its regularly-scheduled Agenda Conference, and heard from staff, the parties and several customers. The Commission observed that its staff had spent an extraordinary amount of time objectively reviewing the quality of AUF's customer service and had independently evaluated of sound recordings for "635 randomly selected customer calls" to AUF's call centers, as well as 103 specific recordings, for a total of 738 recordings. Order No. PSC-10-0218-PAA-WS at p. 4. The Commission further found that:

> the most reasonable means at our disposal for determining if AUF is performing adequately are the actual sound recordings of interactions between consumer and AUF's CSR. Unlike the logs, which captured only complaints and certain inquiries, the sound recordings captured all Florida calls made to AUF call centers. By having all types of Florida calls available for review, our staff evaluated not only customers calling with a

> complaint, but also customers that were calling for more routine issues, such as making a payment by telephone.

Id. at p. 5. The Commission went on to affirm that, "[o]ut of the 738 total sound recordings reviewed, our staff thought that the majority were handled in a courteous and professional manner and the representatives were taking the appropriate action to resolve all issues in the call." *Id.* at p. 6.

The Commission also acknowledged that AUF had implemented measures to improve its customer service including:

- Forming a "Complaint Analysis and Remediation Team" (CART). The CART consists of all call center supervisors and their managers, as well as the Supervisor of Compliance. This team addresses all executive escalations and meets biweekly to review all accounts where further coaching and training issues are identified for follow-up.

- Implementing a Call Escalation Process. The process was developed in April 2009 and was reviewed with all supervisors and the Compliance Team. This escalation process was then communicated to all CSRs in each of AUF's three call centers.

- Developing a detailed Supervisor Audit. This involves the Training Team pulling all supervisor callbacks from the three call centers. These are placed in a folder on AUF's internal network and are reviewed by all management in the call centers. The data is used for coaching and feedback to the CSRs to reduce the number of customer call backs.

- Auditing all its replaced meters in Florida. AUF found that there were some transitional issues that occurred with this change and has audited nearly every meter replaced to ensure that the meter is coded properly to its billing system.

- Standardizing its service order processing system for its field technicians. This change was implemented to improve the communication between the field technicians and the call centers.

- Refining the tracking of customer on-site meter and bench test procedures, since this is a common request.

- Providing an informational brochure to remind customers about contacting the call center when they leave or return to their Florida home. Many of AUF's customers use their Florida home as second residence, and the mailer was designed to encourage customers to contact the call center when they leave for the summer so that their account is properly noted.

Id. at pp. 6-7.

The Commission ultimately concluded that "while preliminary results show **substantial improvement in AUF's customer service**, additional monitoring was required to ultimately render a determination as to the adequacy of AUF's quality of service". *Id.* at p. 12 (emphasis added). In so ruling, the Commission recognized that its Initial Monitoring Plan had imposed substantial cost on AUF and required many hours of both utility staff and Commission staff time. Thus, the Commission directed staff to continue to monitor AUF's customer service through the end of 2010 on a more limited basis and ordered AUF to collaborate with the OPC and other parties to "develop a cost-effective, efficient, and meaningful monitoring plan, and to bring the supplemental monitoring plan to us within 45 days." *Id.* at p. 13.

C. Phase II Monitoring (May 2010 through December 2010)

Pursuant to the directives of the Commission, AUF, OPC and the parties ultimately agreed to a proposed Phase II Monitoring Plan which eliminated the requirements that AUF produce sound recordings, meter reading information, and complaint logs, but continued more limited monitoring of customer service and certain

aesthetic water quality issues. To ensure that this Phase II Monitoring Plan was cost-effective and efficient, the reporting requirements agreed upon by OPC and AUF were structured around (i) non-proprietary reports that AUF was already using internally to monitor and ensure quality of service, and (ii) an aesthetic water quality improvement program that AUF already had underway.

Specifically, the Phase II Monitoring Plan required AUF to provide on a monthly basis the following customer service-related reports:

- A Management Quality Performance ("MQP") Report which tracks on a monthly basis the reasons for customer calls. This report is used by AUF management to understand recent performance and identify any adverse trends.
- A Florida Complaint Support Information Report which provides non-proprietary information for each of the complaint-related calls that underlies the MQP Report for each month.
- A Florida Scorecard which includes quality of service metrics for each month.
- A Call Center Monitoring Statistics Report which tracks the key performance indicators of AUF's call centers on a monthly basis, and is used by AUF to ascertain whether it is meeting its targeted service performance levels.
- A Call Quality Report for all call centers formatted such that monthly data can be tracked for each of the call centers separately.

- A Service Order Status Report which tracks AUF's service order log and the timeliness of closing service order requests.
- An Estimated Read Report which allows staff and the parties to track the number of estimated reads and investigate any adverse trends.

With respect to aesthetic water quality, the Phase II Monitoring Plan agreed upon by OPC and AUF required that AUF to monitor the aesthetic (secondary) drinking water constituents for seven of its water systems: Lake Josephine, Leisure Lakes, Sebring Lakes, Rosalie Oaks, Tangerine, Tomoka View, and Zephyr Shores. OPC and AUF also agreed that AUF would conduct a series of meetings with customer representatives from the seven systems to provide updates on the monitoring, discuss aesthetic water quality concerns, and identify possible solutions and associated costs.

By Order No. PSC-10-0297-PAA-WS dated May 10, 2010 ("Phase II Monitoring Order"), the Commission approved the Phase II Monitoring Plan agreed to by the OPC and AUF. In so ruling, the Commission acknowledged that many of its concerns that led to the Initial Monitoring Plan had been addressed. For example, the Commission noted that during the Initial Monitoring Plan, its staff had

> . . . randomly sampled 358 meter readings taken by AUF and compared those readings to a corresponding set of meter readings taken by Commission staff. Of these 358 meter readings taken by AUF, none were found to be significantly different from the meter readings taken by our staff. Therefore, we find that no further testing of AUF's meter reading accuracy is necessary.

Phase II Monitoring Order at p. 6. The Phase II Monitoring Order also recognized that staff had randomly sampled 50 customer bills which showed that all of those bills were

appropriately based upon the usage indicated by the meter readings taken by AUF. *Id.* However, at the March 16 Agenda Conference, a former Commissioner insisted that the sample size of 50 may not be sufficient to provide adequate assurance that all customer bills are appropriately based on actual meter readings. The Commission therefore instructed staff to expand this sample to the same sample size of 358 used to determine the accuracy of AUF's meter reading. *Id.* at p. 7.

In addition to the monitoring requirements agreed upon by OPC and AUF, the Commission required AUF to provide quarterly reports on environmental compliance and directed staff to review enforcement actions taken by the FDEP, the County Health Departments, and the Water Management Districts ("WMDs") through the end of 2010 for each of AUF's jurisdictional water and wastewater systems. The Commission also directed AUF to report on capital projects designed to improve the water quality at the Chuluota system. Finally, the Phase II Monitoring Order instructed AUF to file a final report by the end of February, 2011, summarizing the results of AUF's Phase II reporting requirements. AUF is filing this final report pursuant to the Commission's instruction.

II. Summary of Phase II Monitoring Reports

A. Management Quality Performance Report

The Management Quality Performance Report is a high level report used by AUF to track the reasons for customer calls to the call centers. AUF management relies on the information contained in this report to identify customer service trends from month to month and prepare responsive actions where needed. A sample report is provided in

Exhibit "A". Data derived from Management Quality Performance Reports shows that the vast majority of the calls received by AUF's CSRs during the Phase II monitoring period involved routine day-to-day issues such as move in/move out requests, payment questions, requests to pay over the phone, and requests to verify account balances.

The data gathered in these reports during the Phase II monitoring period was consistent with AUF's expectations and there does not appear to be abnormal variances or trends for Florida calls. Of course, any call related to a water quality complaint, a boil water notice or an emergency repair is immediately addressed by a customer service technician through the issuance of a service order.

B. Florida Complaint Support Information Report

The Florida Complaint Support Information Report consists of more granular non-proprietary information for each of the complaint-related calls identified in the Management Quality Performance Report. This report provides AUF management with additional call information by system and thus enhances AUF's ability to identify customer service trends and to more effectively tailor responsive actions where needed.

The report also enables AUF management to investigate unexplained increases in call volume. For example, these reports reveal that call volumes increased:

- from the Jasmine Lakes system in August 2010 when one of AUF's water mains was damaged by Verizon and a boil water notice was sent out to customers.

- from the Jasmine Lakes system in September 2010 when Pasco County damaged one of AUF's water mains and a boil water notice was sent out to customers.
- from the Lake Gibson Estates system in September 2010 when the system was shut down during a tank replacement project.
- from the Lake Gibson Estates system In November 2010 when a well went off line and a boil water notice was issued.
- from the Lake Osborne Estates system in November when there was an unexpected main break.
- from the Palm Terrace system in November 2010 when a broken valve caused system outages.

Unlike the Initial Monitoring Plan, the Phase II Monitoring Order did not require AUF to file extensive complaint logs with the Commission. Instead, the Commission staff was directed to produce monthly reports that track complaints filed at the Commission Call Center. AUF has closely reviewed the complaint reports filed by Commission staff in this docket. On average, approximately thirteen complaints were registered with the Commission Call Center each month during the Phase II monitoring period. Based on AUF's analysis, it appears that the overwhelming majority of complaints listed in the staff reports relate directly to customer concerns about the utility's approved rates and bills. [2] Furthermore, staff's reports show that AUF acts promptly and properly to resolve

[2] It is also noteworthy that a group advocating government takeover of private water utilities like AUF has aggressively encouraged AUF customers to file complaints and write letters to the Commission and other public officials. See **Exhibit "B"**.

complaints filed at the Commission's Call Center. Indeed, AUF has a Customer Field Service Manager dedicated to investigating and responding to all Florida customer complaints in accordance with Commission regulations.

C. Florida Score Card

The Florida Score Card is a performance-based report structured around AUF's own quality of service metrics. Management meets with AUF employees on a weekly basis to review this data. This report applies to all jurisdictional and non-jurisdictional systems in Florida. Notably, while the Commission has not adopted customer service metrics for water and wastewater utilities, AUF has been proactive in this area and has adopted its own aggressive service quality metrics. See **Exhibit "C"**.

AUF's customer service metrics address service-related issues including: meter read rates; percentage of meter reading cycles completed by a scheduled date; overall estimation rates; accounts estimated for over 90 days; and percentage of active accounts not billed. The Florida Score Card reports filed during the Phase II monitoring period show that AUF is committed to good customer service and has done an excellent job in meeting its service quality goals with some limited and expected exceptions.

AUF met its targeted goals in all but the following instances over the eight month Phase II monitoring period. In June 2010, AUF was slightly below its targeted meter read rate due to a downloading glitch which required AUF to "re-read" 115 meters. This "re-read" of the 115 meters also caused AUF to be slightly below its targeted goal for Percentage of Cycles Completed in June. In July, AUF was slightly over its target of

.15% for Accounts Estimated > 90 days. The achieved metric was slightly higher in July (.16%) because of a meter change out in AUF's Sarasota County system which resulted in customers receiving estimated bills. AUF's Sarasota County system is not regulated by the Commission.

AUF was slightly outside of its target goal for Percentage of Active Accounts Not Billed target in July, September, October, and November. This is an expected result for these months when there are higher volumes of "move ins" by seasonal customers. For example, when a seasonal customer moves back in, the report will reflect that the last time the account was billed was when the customer moved out several months prior. The extended period of time between bills is to be expected under this scenario.

In summary, the Florida Scorecard Reports show that AUF has been proactive in adopting aggressive quality control metrics, and has done an excellent job in meeting those service quality goals.

D. Call Center Monitoring Statistics Report

The Call Center Monitoring Statistics Report was provided to Commission staff and the OPC on a monthly basis during the Phase II monitoring period. Please see **Exhibit "D"**. This report is based on Call Center performance indicators which provide AUF management with insights into:

- proper staffing of the call center;
- how quickly customers are connecting to a CSR ("calls answered in < 90 seconds");

- how many calls are coming into the call centers each day ("average calls/day"); and,
- the time a customer waits on the phone before speaking with a CSR ("average speed to answer").

AUF has established aggressive performance goals for its call centers. With respect to answer time, AUF's goal is to have 80% of all calls answered in less than 90 seconds, AUF has consistently met this goal with the minor exceptions in June (74%), July (73%) and October (79%) when there was an unexpected increase in the number of calls into the call center. AUF also has a goal to achieve an average answer time of 60 seconds. AUF met this goal every month with the exception of July where the average answer time was 61 seconds.

Another of AUF's goals is to limit the number of abandoned calls to 5%. AUF met this goal every month during the Phase II monitoring period with minor exceptions in June (5.4%) and July (5.6%).

E. Customer Service Representative ("CSR") Call Quality Scores Report

AUF provided its CSR Call Quality Reports on a historical basis (2007 through 2010), as well as on a monthly basis throughout the monitoring period. See **Exhibit "E"**. This report is utilized by AUF management to evaluate performance of CSRs in answering customer calls at the call centers. AUF call center managers randomly sample CSR calls and evaluate them on a monthly basis. The evaluation addresses the CSR's

soft skills such as tone and demeanor and focuses on whether the CSR has fully satisfied the customer's inquiry.

The reports supplied for the months of May through December 2010 shows that the call center performance has improved dramatically when compared to the period January 2008 through November 2008. The reports also demonstrate that from December 2008 through December 2010, the Call Centers have consistently exceeded AUF's targeted service performance goals.

F. Service Order Report

The Service Order Reports are designed and used by AUF management to track pending service order requests and to ensure that those requests are properly addressed as soon as practicable. The service order reports were provided to Commission staff, OPC and the parties on a monthly basis throughout the Phase II monitoring period. In reviewing these reports it is important to understand that service orders are created by CSRs for a myriad of different reasons, including but not limited to: requests for bench tests to evaluate meter accuracy; requests to repair a broken meter, and requests to investigate a water main break. These service orders may involve issues that can be resolved in one visit or may require several visits to achieve final resolution. For purposes of the tracking reports, a service order is not closed until there is complete and final resolution. AUF strives to address customer concerns within 14 days of the service order, with 7 days being the goal. The service order reports show that the overwhelming majority of service order requests are addressed within these timelines. However, despite

AUF's best efforts, there are anomalies and some customer issues are not completely resolved within 14 days.

During the Phase II monitoring period, AUF processed 510 service orders, 460 of which were closed within 14 days. There were no service orders open over 14 days in May or August. Only three service orders were open over 14 days in June, one over 14 days in July, one over 14 days in September, and two over 14 days in October. In November, there was an anomalous incident which resulted in an abnormally high number of open service orders. This was due to a computer interface malfunction which temporarily interrupted the transmission of CSR generated service orders to field service representatives. The delay resulting from this computer interface interruption caused service orders to remain open beyond AUF's timeline targets. This incident was an anomaly and accounted for almost all of the November service orders that were closed beyond the 14 day goal. When AUF discovered the issue, AUF moved promptly to rectify the problem. Indeed, reports show that in December there was only 1 service order open over 14 days.

In summary, the Service Order Reports show that AUF vigilantly tracks, and consistently follows through on, service order requests.

G. Estimated Read Report

Unlike the Florida Score Card (which is Florida specific), this report provides the estimated read rates for all states where Aqua America subsidiaries operate. The Estimated Read Reports show that the estimation rate for Florida has been consistently

below the target goal of 1% for some time now. During the Phase II Monitoring Period, the Florida estimation rate has improved even more. In fact, the estimated reads have been consistently at or below 0.5%, with the past 6 months being between 0.1% to 0.3%.

The results of this report confirm the benefits of the new radio frequency meters which have now been installed at all of AUF's systems in Florida.

III. AUF'S Secondary Water Quality Project

A. Background

Aesthetic water quality involves non-health related characteristics of water such as taste, color, odor, hardness and turbidity. The United States Environmental Protection Agency ("EPA") has developed secondary drinking water standards that pertain to aesthetic water quality, which standards have been adopted by the FDEP. Unlike primary drinking water standards, typically secondary standards are not enforced by EPA and FDEP, but simply function as guidelines.

The Phase II Monitoring Plan approved by the Commission includes an aesthetic water quality component, which was based on a aesthetic water quality improvement program that AUF already initiated ("Original Aesthetic Program"). AUF initiated its Original Aesthetic Program in 2008 to address customer comments related to aesthetic water quality made during the last rate case. While aesthetic water quality standards are not typically enforced by environmental agencies, AUF proactively developed its Original Aesthetic Program as a plan to effectively address its customers' aesthetic water quality concerns. As part of its Original Aesthetic Program, AUF reviewed: comments

from customers at the public hearings; complaints dealing with aesthetic water quality issues; aesthetic water quality sampling data; and, feedback from area coordinators. AUF also surveyed customers on aesthetic water quality. As a result of this process, AUF identified seven (7) water systems where customers had expressed the most concern regarding aesthetic water quality issues: Lake Josephine, Leisure Lakes, Sebring Lakes, Rosalie Oaks, Tangerine, Tomoka View, and Zephyr Shores. OPC and AUF agreed that these same seven (7) systems would be the focus of the Phase II Monitoring Plan's aesthetic water quality component.

B. Aesthetic Monitoring

Pursuant to the Phase II Monitoring Plan, AUF monitored the secondary (aesthetic) drinking water constituents for the seven water systems listed above. The results of that monitoring are appended as **Exhibit "F"**.

C. Joint Secondary Water Quality Task Force Meetings

During the summer of 2010, in accordance with the Joint Monitoring Plan, AUF met twice at each of the seven system locations with OPC and designated customer representatives to discuss aesthetic concerns, possible solutions to those concerns, and associated costs. AUF also participated in a mid-point meeting on January 20, 2011 with Commission staff, the OPC, and other interested persons to discuss the status of the customer meetings on aesthetic issues. Handouts distributed at the customer meeting are attached as Composite **Exhibit "G"**. The results of those meetings are summarized below.

Lake Josephine / Sebring Lakes

Through its Original Aesthetic Program, AUF had identified the Lake Josephine and Sebring Lakes systems as having experienced aesthetic water issues concerning taste and odor which stem from naturally occurring hydrogen sulfide in the water.

Because these two systems are interconnected, the customer meetings for Lake Josephine and Sebring Lakes were combined and took place on July 7, 2010 and again on September 21, 2010. Representatives from Lake Josephine were invited but did not attend.

At the meeting on July 7, 2010, AUF representatives and Sebring customer representatives discussed the water having a sulfur taste and odor. The Sebring representatives expressed the desire to address the aesthetic water quality issues. AUF shared its water quality test results and discussed treatment options for these facilities. AUF then explained its experience with the AdEdge treatment system and the positive impacts it had on sulfur issues in AUF's other pilot programs. AUF informed the customers that an RFP/RFQ was being prepared to design and permit the AdEdge treatment system, and explained that this bid process allowed for bidding firms to recommend alternative treatment for these facilities.

At this meeting, Sebring customer representatives suggested that would it be a better alternative to loop the distribution lines within the system to help address the water quality issues rather than installing treatment at what may be a higher cost. The customers asked AUF to consider this alternative. AUF representatives stated that they would do so and report back at the follow-up meeting.

At the follow-up meeting on September 21, 2010, AUF representatives presented a cost/benefit analysis regarding the customers' looping suggestion. This analysis showed that the cost of looping was considerably more expensive that the AdEdge alternative and that "looping" would not effectively address the sulfur issue. At this meeting, the customer representatives appeared to be satisfied with the improvements AUF was making in the system. Currently, AdEdge is constructing the filters for the treatment system, and AUF and its engineers have had a pre-submittal meeting with FDEP to inform the agency that a permit filing is forthcoming.

Leisure Lakes

Through its Original Aesthetic Program, AUF had identified the Leisure Lakes system as experiencing aesthetic water issues concerning odor and taste which stem from naturally occurring hydrogen sulfide, calcium, and sediment in the water. AUF and OPC representatives met with Leisure Lakes representatives on July 7, 2010 and again on September 21, 2010.[3]

At the first meeting on July 7, 2010, AUF representatives and customers discussed that, despite the flushing plan implemented in 2009, customers were still experiencing odor issues related to sulfur in the water. After sharing the water quality testing results with the Leisure Lake representatives, AUF discussed treatment options needed to address the sulfur related odor issues. Specifically, AUF representatives discussed the AdEdge treatment system with the customer representatives, who expressed a particular

[3]AUF representatives had previously met with the homeowner's association (HOA) in April 2009 to discuss aesthetic water quality issues. At that time, AUF developed a flushing plan that continues to this day.

interest in the design and inquired if any buildings needed to be constructed. The customer representatives indicated that they would like to review the design and wanted information about the colors of the storage tank and building. The customer representatives shared that they wanted AUF to address the odor issues. Furthermore, the customer representatives advised AUF that the HOA board had conducted its own independent survey of the residents concerning the water quality, and the results of that survey indicate that residents want AUF to resolve the sulfur issue.

At the follow-up meeting on September 21, 2010, AUF representatives provided an update on the status, design and permitting of the AdEdge system. AUF also provided an overview of the additional capital costs related to the project. The customers generally seemed satisfied with this plan. Currently, AdEdge is constructing the filters and AUF and its engineers have had a pre-submittal meeting with FDEP to inform the agency of the forthcoming permit filing.

Rosalie Oaks

Through its Original Aesthetic Program, AUF had identified the Rosalie Oaks system as experiencing aesthetic water issues concerning taste, odor and clarity which stem from sporadic flows and naturally occurring sediment in the water. AUF and OPC representatives met with Rosalie representatives on July 8, 2010 and again on September 22, 2010.

The Rosalie Oaks system is a weekend and holiday get-away for the residents; thus, system usage is intermittent and sporadic. This intermittent and sporadic usage

pattern presents challenges for AUF to maintain aesthetic water quality for the system. Therefore, as part of its Original Aesthetic Program, AUF had evaluated the water quality, the distribution system and frequency in which the system was flushed.

Prior to being included in Original Aesthetic Program, the Rosalie Oaks system lacked critical valves and flushing hydrants. Thus, AUF devised a directional flushing program for Rosalie Oaks by installing a short water main extension and flushing hydrant to flush the system properly. A flushing protocol was developed to address the weekend and holiday customers' usage patterns. The protocol calls for the operator to flush the water mains before a weekend or holiday to assure that customers have quality water.

At the first meeting on July 8, 2010, AUF representatives shared the water quality test results and discussed water quality in the system. Two customers represented the system. One was satisfied with the water quality and stated she never had issues with the water quality. The other expressed issues with the water quality and was unaware of the flushing program that AUF had already put in place. Based on the feedback, AUF representatives stated they would continue address aesthetic water quality by flushing prior to weekends and holidays.

At the follow up meeting on September 22, 2010, the customer representative present was unaware when flushing occurred. AUF representatives agreed to keep this customer apprised when flushing occurred. AUF has since followed up with this customer who has indicated that personal notification is no longer needed when flushing activities occur. Currently, AUF has continued with its systematic flushing plan. Based on the customer base and intermittent use of this system, AUF determined that systematic

flushing was the most appropriate and cost effective solution to address the aesthetic water quality issues.

Tangerine

Through its Original Aesthetic Program, AUF had identified the Tangerine system as experiencing aesthetic water issues concerning color, odor, and turbidity, which stem from naturally occurring iron, hydrogen sulfide, calcium and sediment in the water. AUF and OPC representatives met with customers of this system on July 9, 2010 and again on September 23, 2010.

At the July 9, 2010 meeting, AUF representatives and Tangerine customer representatives discussed discolored water concerns. The customers generally expressed their desire for the Company to address the aesthetic water quality issues. AUF discussed the sequestering process and the looping initiative in the system, which it had previously designed, permitted and installed to address the iron and hardness issue in the water. The sequestering system was operational in the summer of 2010.

At the follow up meeting on September 23, 2010, the Company reviewed the costs of the sequestration and looping projects with the customers who seemed satisfied with the course of action AUF was taking to address the aesthetic water quality concerns.

In addition, a customer raised the issue concerning a fire she previously had at her home. She stated that there was not a fire hydrant in the vicinity. After the meeting, AUF representatives met with the customer to determine where she lived in relationship

to the nearest fire hydrant. As a result of this meeting, AUF had a contractor install the fire hydrant in the customer's vicinity.

Currently, a sequestering treatment system is in place and operating in Tangerine. Furthermore, AUF has installed various water main extensions in order to connect dead ends. These initiatives have improved pressure problems, given the water a "softer" taste, removed sediment from the system.

Tomoka View

Through its Original Aesthetic Program, AUF had identified the Tomoka View system as experiencing aesthetic water issues concerning taste and odor, which stem from naturally occurring hydrogen sulfide, calcium and sediment in the water. The system also experienced a primary water quality issue involving Trihalomethanes ("TTHMs").[4] AUF signed a consent order on December 18, 2009, which was discussed in AUF's last rate case. In accordance with that consent order, AUF completed construction of the chloramination system, which was placed in service in December 2009. The results from the quarterly samples taken from December 2009 to June 2010 and the rolling annual average ("RAA") for the second quarter of 2010 were all well below the TTHM standards. AUF has received notification from the Volusia County Health Department that the system has been put on reduced monitoring for TTHMs. The consent order is now closed.

[4] Trihalomethanes are disinfection by-products ("DBPs") created when water containing even trace amounts of natural organic carbon is disinfected with chlorine. Water sources with relatively higher levels of total organic carbon or high chlorine demand can generate elevated levels of TTHMs when disinfected with chlorine.

The first meeting with Tomoka View took place on July 9, 2010 with a follow up meeting on September 23, 2010. At the July 9th meeting, AUF representatives discussed the chloramination system. Tomoka View representatives were very satisfied that the TTHM issue was resolved and the water quality had improved since additional treatment and flushing programs were initiated. The customers were also informed of the storage tank project to install a new liner preventing leakage through the deteriorating concrete block walls of a storage tank. AUF representatives explained that the project has been delayed due to Volusia County requiring engineering documents detailing the installation of the temporary hydropneumatic tank the contactor will be installing. The current estimated date of completion is March 30, 2011.

Customer representatives also discussed the issue of dark rings in the toilet bowl and pink film in shower stalls or bath tubs. AUF representatives provided the customers with information on these issues and made customers aware that the cause was related to airborne bacteria. The customers had previously attributed this occurrence to poor water quality.

At the follow-up meeting on September 23, 2010, AUF representatives primarily discussed a temporary nitrification issue that had arisen in July of 2010. (The American Water Works Association estimates that nitrification occurs to some degree in two-thirds of the public drinking water systems that use chloramines as a means of disinfection.) AUF explained that it has a vigorous nitrification surveillance protocol and when nitrification was detected, it moved promptly to remedy the situation. After public notice was issued, the system was converted to free chlorine for disinfection and directionally

flushed. The system remained on free chlorine for approximately 30 days. After public notice, the disinfection process was converted back to chloramines. The distribution system has not had any nitrification issues since then, and AUF is planning to convert to free chlorine again in June 2011 for 30 days as a preventative measure.

Zephyr Shores

Through its Original Aesthetic Program, AUF had identified the Zephyr Shores system as experiencing aesthetic water issues concerning color, hardness and turbidity, which stem from naturally occurring manganese, calcium, iron and sediment in the water. AUF designed, permitted and installed a sequestering agent to address these aesthetic issue and that sequestering system was operational in March of 2010.

AUF representatives and the OPC met with Zephyr Shores representatives on July 9, 2010 and again on September 22, 2010. Both meetings were attended by many customers who expressed concern about rates and the desire for AUF to be taken over by either the FGUA or Pasco County.

At the July 9 meeting, AUF representatives discussed the status of utilizing a sequestering agent to address the aesthetic water quality issues, and further reported that to properly flush this system, critical valves needed to be installed and additional flushing hydrants were needed. AUF explained that a contractor was hired and the valves and flushing hydrants had been installed. Furthermore, a written flushing plan was developed to instruct the operator how to flush the system.

During the meeting some customers raised concerns about low water pressure in a specific area of the development. AUF committed to analyze the system and present solutions for the next meeting.

At the follow-up meeting on September 22, 2010, AUF's engineer presented two solutions to the pressure issue. The first involved installing a water main through an easement between 2 properties. This option was objected to by a customer that owned the intervening property impacted by the easement. The second option involved installing the water main alongside the roadway. This option would involve a longer route than the first option but would accomplish the same results. Currently, the main is being designed along the roadway and AUF is preparing to meet with the HOA board to discuss the location and obtain any necessary utility easements.

IV. Quarterly Environmental Compliance Reports

A. Background

The Phase II Monitoring Order required AUF to file quarterly "environmental compliance" updates describing the status of outstanding warning letters, consent orders and notices of violation. See Phase II Monitoring Order at p. 6. The updates were to include information concerning enforcement actions identified in the Final Order, additional warning letters, consent orders, and notices of violation issued during the period, and AUF's plan to resolve each alleged violation. In accordance with those requirements, AUF filed quarterly updates with the Commission on July 10, 2010 and

again on October 11, 2010.[5] AUF's final quarterly update for the fourth quarter of 2010 is attached as **Exhibit "H"**. Before addressing the quarterly compliance updates that AUF provided, it is important to understand the terminology used by the Commission with respect to environmental compliance. As the Commission explained in this docket:

> DEP conducts periodic inspections of all water and wastewater facilities and, if environmental compliance violations are found, a "noncompliance letter" is sent describing the violation. The utility is given time to respond and correct the violation. If the utility fails to respond or if the response is insufficient, the utility is sent a "warning letter" which describes the outstanding violation and DEP's recourse if the violation is not resolved. If the utility and DEP agree on a resolution, a "consent order" is issued describing the resolution. If an agreement is not reached, DEP issues a "notice of violation" which may result in a hearing.

Order No. PSC-10-0281-PAA-WS at 10.

It is also important to note that, when the Commission instructed OPC and AUF to agree upon a Phase II Monitoring Plan, the Commission and its staff had thoroughly evaluated AUF's environmental compliance up to that point. The Commission expressly found that:

> It appears that AUF has been responsive to DEP and the County Health Departments in attempting to resolve compliance issues. In some cases, compliance involves complicated and difficult issues which can take significant time to resolve. To date, five of the nine outstanding consent orders and warning letters referred to in the Final Order have been resolved. No notices of violation have been issued. Although two new consent orders and three warning letters have been issued, we note that AUF is responsible for more than 80 water and wastewater systems regulated by us.

Id. at p. 12.

[5] In its quarterly update filed on October 11, 2010, AUF explained that because the previous quarterly update was filed on July 10, 2010, the next quarterly update would have to have been due in October not September as indicated in the Phase II Monitoring Order.

B. Overview of Quarterly Environmental Compliance Updates

The quarterly environmental compliance updates which AUF has submitted show that AUF continues to be extremely responsive to FDEP and County Health Departments concerning environmental compliance. Indeed, the information and activities described in those reports confirm that AUF's top priority is to ensure that all of AUF's systems comply with applicable water and wastewater standards and regulations. Furthermore, as of the date of this report, AUF has no notices of violation from FDEP or the Department of Health. Moreover, as shown in the attached **Exhibit "I"**, AUF has taken aggressive steps to resolve all of the environmental compliance issues which had been identified in the Final Order during the last rate case.

While AUF is proud of its environmental compliance for all of its systems, it is particularly pleased to report that it has made significant improvements to the Chuluota water system. The Commission removed the Chuluota water and wastewater system from the last rate case primarily because it found that the quality of service for that particular system was unsatisfactory. That finding with respect to AUF's Chuluota system was based primarily on water quality issues involving disinfection byproducts (TTHMs), which were the subject of an open consent order with the FDEP at the time of the last rate case.

Since the last rate case, AUF has made significant improvements to the Chuluota system and has invested over $2.3 million dollars in a state-of-the-art ion exchange system to address the TTHM issue. As a result of those improvements, the Chuluota

system has been in compliance with TTHM standards for all of 2010, and FDEP has closed out the consent order.

V. Conclusion

For almost two years now, AUF's customer service has been the focus of a rigorous and unprecedented review by the Commission, its staff, the OPC, and other parties. AUF has timely complied in all respects with the monitoring and reporting requirements imposed by the Commission and, in so doing, has incurred significant costs. During the course of this intensive monitoring, AUF has supplied the Commission, the OPC and the parties with thousands of pages of data, documents, audio tapes, and reports. That information clearly shows that AUF has good customer service and consistently complies with environmental requirements. The information in this report further shows that AUF has been proactive in establishing quality of service performance goals to ensure that its good customer service will be maintained into the future.

EXHIBIT A

Exhibit A

Aqua Florida
Quality Performance Report

	June 2010	
	%	Total
Move in or Move out	18	1051
Pay by Phone - Speedpay	14	803
Verify Account Balance	11	632
Customer Account Changes	9	504
Shut-Off Notice	5	285
Explain Bill	5	279
Payment Arrangement	5	263
Restore Service	4	236
Payment Confirmation Number	4	230
High Bill Complaint	3	174
No Water	2	140
Verify Receipt of Payment	2	132
Dispute Bill	2	107
Turn On or Turn Off Service	2	96
Service Line Leak	2	90
Zip Check Sign Up	1	64
Meter Problem	1	57
Leak Adjustment	1	54
Payment Location Inquiry	1	45
Boil Water Notice Inquiry	1	45
All Other Calls	8	453

EXHIBIT B

Agenda Conference May 24 Tallahassee

No commentsEventsFebruary 22nd, 2011FReams

We are planning to repeat our Bus trip to Tallahassee and to attend and hopefully speak at this hearing which will be held on Aqua's latest request for an increase in rates and Single Tariff Pricing. Also, discussed will be Aqua's level of customer service based on the order issued at the last Agenda conference March 16, 2010 at that conference the commission ordered Aqua to continue submitting monthly reports on Customer Contacts as well as delays in service requests by system and percent of customers billed in the normal cycles.

If you would like to attend this upcoming meeting in Tallahassee please submit your requests via the website, we will be emailing updated information to all who are signed up for our Newsletter sent each week. As we receive requests we will be determining boarding locations for the busses.

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Feb
16

Charolette Observer Aqua NC rate case

No commentsUncategorizedFebruary 16th, 2011FReams

Aqua North Carolina, the state's largest private water utility, is asking state regulators for a hefty rate increase for the second time in three years.

The move has riled homeowners who already pay Aqua about $100 for typical monthly usage, twice as much as residents of Raleigh, Charlotte and other municipal utility departments. Aqua is asking for 20.4 percent more for water service and 16.4 percent more for sewer service, which would add $13 to monthly bills. In 2009 those fees went up 12.5 percent and 29.7 percent.

This time, homeowners are organizing and plan to stage a rally outside the N.C. Utilities Commission office in Raleigh the day of the public hearing on the rates. The hearing date has not yet been set but could draw protesters from much of the state.

For the rest of the story copy and paste link below

http://www.charlotteobserver.com/2011/02/15/2063459/privatewater-utilitywants-heftyrate.html#ixzz1E2dkX8r4

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Feb
15

Send AUF Complaints to:

No commentsUncategorizedFebruary 15th, 2011Dbussey

Office of Governor Rick Scott

State of Florida

The Capital

400 S. Monroe St.

Tallahassee, Fl 32399-0001

Rick.Scott@eog.myflorida.com

Kurt S. Browning

Florida Secretary of State

500 S. Bronough St.

R.A. Gray Building

Tallahassee, Fl 32399-0250

secretaryofstate@dos.state.fl.us

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Feb
15

Complain! Complain! Complain!

No commentsUncategorizedFebruary 15th, 2011Dbussey

Our voices are getting stronger..... keep filing complaints with the PSC..... write your senator and representative..... don't forget to let our new governor know about our problems with Aqua Utilities Florida..... let the Secretary of State know about it, too.

Let everyone know how upset you are with the PSC and AUF.

Are your rates too high? Tell them!

Should AUF be allowed to acquire more utilities? Tell them!

Is your Customer Service lousy? Tell them!

Do you want AUF kicked out of Florida? Tell them!

Do you want the PSC to do what's right, instead of "business as usual"? Tell them! And keep on telling them until they do something about it!!!!!

Dave Bussey

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Feb
11

EXHIBIT C

Exhibit C

Score Card -Customer Service									
		May	June	July	August	September	October	November	December
	Target	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual
Read Rate of Metered Accounts	99.00%	99.30%	98.90%	99.30%	99.20%	99.20%	99.30%	99.20%	99.30%
% of cycles completed on scheduled date (+ or - 1 Day)	100.00%	100.00%	99.10%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Overall Estimate Rate	0.80%	0.30%	0.50%	0.30%	0.20%	0.10%	0.02%	0.02%	0.10%
Accounts Estimated>90 days	.15%	0.12%	0.10%	0.16%	0.10%	0.07%	0.11%	0.11%	0.08%
Percentage of Active Accounts Not Billed	0.06%	0.04%	0.03%	0.13%	0.06%	0.07%	0.19%	0.26%	0.04%

EXHIBIT D

Exhibit D

Call Center Stats	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Explanation of Statistics
Customers (approx)	858,041	858,041	858,041	893,261	893,261	893,261	893,261	940,279	940,279	940,279	Refers to the approximate number of customers being serviced by the call centers
Total Calls	83,798	82,069	76,066	95,841	91,194	95,975	92,000	92,755	90,823	83,950	The number fo total calls that were received through the toll-free number that went into a service queue (does not include customers
Days Open	23	22	20	22	21	22	21	21	21	21	Days in month that call centers were open for business
Average Calls/Day	3,643	3,730	3,803	4,356	4,343	4,363	4,381	4,417	4,325	3,998	Calculated by dividing Total Calls by Days Open
Abandon Rate	2.10%	1.40%	1.40%	5.40%	5.60%	2.90%	3.10%	4.20%	2.70%	2.00%	Percentage of Total Calls where customers disconnected (abondoned) prior to a CSR answering
Calls Answered in < 90 Seconds	91%	95%	95%	74%	73%	86%	85%	79%	87%	92%	Percentage of calls where a CSR answered in 90 seconds or less
Average Speed to Answer	22 sec	14 sec	15 sec	57 sec	61 sec	32 sec	33 sec	44 sec	28 sec	21 sec	The average time in seconds that a customer waited before their call was answered by a CSR
Average Handle Time	4:37	4:26	4:31	4:35	4:39	4:34	4:31	4:35	4:26	4:25	The average for all answered calls of tatl talk time plus total hold time plus any time for after call work completed by the CSR
Average #CSR/Day	65.6	66.7	66.6	63.5	62.7	64.7	65.6	65.1	65.3	63.2	The average number of CSRs who logged in each day during the stated month
Calls Answered	82,038	80,920	75,001	90,656	86,087	93,192	89,148	88,859	88,371	82,271	Total Calls less abandoned calls

EXHIBIT E

Exhibit E

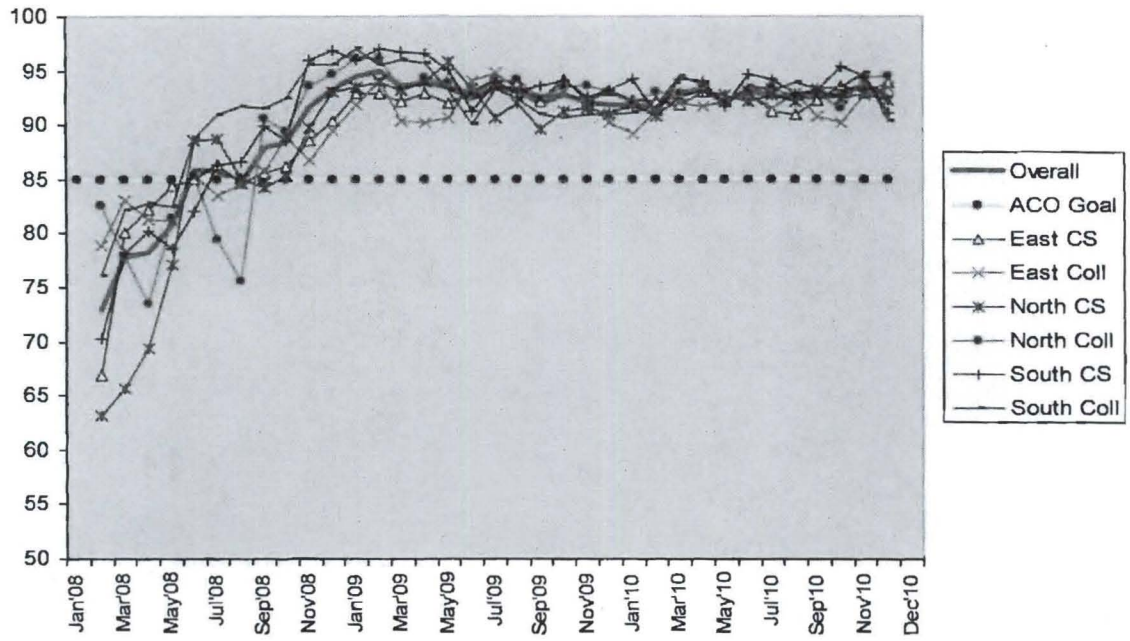
100
95
90
85
80
75
70
65
60
55
50
Jan'08
Mar'08
May'08
Jul'08
Sep'08
Nov'08
Jan'09
Mar'09
May'09
Jul'09
Sep'09
Nov'09
Jan'10
Mar'10
May'10
Jul'10
Sep'10
Nov'10
Dec'10
Overall
ACO Goal
East CS
East Coll
North CS
North Coll
South CS
South Coll

EXHIBIT F

Lake Josephine and Sebring Lakes

		4/20/09		4/20/09		6/24/10	6/24/10	8/12/10	8/12/10	9/7/10	9/7/10	9/23/10	9/23/10	9/23/10	9/23/10	9/23/10	9/23/10	9/23/10	10/15/10	10/15/10	10/15/10	10/15/10	10/15/10	10/15/10
		10:55	Lk Jo	Sebring Lks	Sebring Lks	12:30	13:10	9:28	10:15	12:10	12:55	12:00	12:28	12:58	12:00	18:05	13:25	13:40	10:45	10:55	11:10	11:20	11:50	12:10	12:25
		Base Line	Base Line	Base Line	Base Line		DWTP-		Lk Jo 2		Lk Jo 2	DWTP-	2540	201	DWTP-	DWTP-	13641	4904	DWTP-	DWTP-	13641	4904	DWTP-	2540	201
		Data	Data	Data	Data	POE	POE	POE	POE	POE	POE	Well#1	Gresham	Natura	Well#2	Well#3	Temple St	Grand	Well#1	Well#2	Temple St	Grand	Well#1	Gresham	Nature Ln
Aluminum	mg/L					0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U		0.02 U	0.02 U			0.02 U	0.02 U							
Chloride	mg/L		33		41	46	72	46	68	38	90		37	38			50	46							
Copper	mg/L					0.002 U	0.007 I	0.002 U	0.003 I	0.004 I	0.009		0.005 I	0.008			0.01	0.008							
Fluoride	mg/L		0.15		0.14	0.18 I	0.17 I	0.13 I	0.13 I	0.14 I	0.14 I		0.13 I	0.12 I			0.13 I	0.11 I							
Iron	mg/L	0.6	0.04	0.18	0.18	0.017 I	0.028	0.015 I	0.036	0.015 I	0.05	0.052	0.204	0.106	0.025	2.95	0.024	0.008 I	1.05	0.199	0.083	0.033	0.133	0.113	0.225
Manganese	mg/L	0.04	0.03		0.0026	0.0023	0.0023	0.0022	0.0029	0.0018 I	0.0028		0.0163	0.013			0.0011 I	0.0005 U	0.0308	0.0023	0.0022	0.0021	0.0019 I	0.0049	0.0099
Silver	mg/L					0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 I	0.001 U							
Sulfate	mg/L		28		1.7	27	37	31	42	27	39		26	26			37	34							
Zinc	mg/L					0.004 U	0.01 I	0.008 I	0.012 I	0.018	0.018		0.01 I	0.005 I			0.005 I	0.004 U							
Color	color units					13	22	8	18	9	6		1 U	2			9	1 U	9	12	11	10	13	21	7
Odor	T.O.N. @40c					1	1	0 U	0 U	0 U	3		0	0			0	0	0 U	40	0 U	0 U	240	0 U	0 U
pH	pH unit		7.67		7.62	7.83	7.98	7.89	7.84	7.69	7.88	7.38	7.51	7.78	7.5	8.13	7.88	7.87	7.94	7.6	7.83	7.98	7.85	7.66	7.64
TDS	mg/L	192	286	122	346	322	390	309	380	296	352		308	306			354	336	242	274	324	312	248	296	290
Foaming agents	mg/L					0.04 I	0.05 I	0.04 I	0.02 U	0.03 I	0.08		0.03 I	0.03 I			0.09	0.03 I							
Free Chlorine Residual	mg/L												1.8	1.6			1	1							
Alkalinity	mg/L	170	170	108	108							185			184	167			193	185	189	187	190	180	188
Hardness	mg/L	185	185	113	113							213			200	154			197	211	208	211	198	194	200
Calcium	mg/L											54			50	31.5			43.9	53.4	52.8	53.6	49.1	48.4	49.7
Magnesium	mg/L											18.9			18.2	18.5			21.3	18.8	18.7	18.9	18.2	17.8	18.4

		10/18/10	10/18/20	11/16/10	11/16/10	11/16/10	11/16/10	11/16/10	11/16/10	11/16/10	11/16/10	11/16/10	12/8/10	12/8/10	12/21/10	12/21/10	12/21/10	12/21/10	12/21/10	12/21/10	12/21/10	12/21/10	12/21/10
		10:30	11:10	8:20	8:25	10:45	10:55	11:00	11:25	11:35	11:50	12:00	8:45	9:40	8:30				9:45	10:00	10:15	10:30		
		Lake	Lake Placid	DWTP-	DWTP-	DWTP-	DWTP-	Lake	2540	201	13641	4904	Lk Jo Plant	DWTP-	DWTP-	DWTP-	4904	13641	DWTP-	DWTP-	2700 Oak	212		
Aluminum	mg/L	0.02 U	0.02 U					0.02 U					0.02 U	0.02 U										
Chloride	mg/L	42	39					39					52	38										
Copper	mg/L	0.002 U	0.002 U					0.002 I					0.002 U	0.002 U										
Fluoride	mg/L	0.14 I	0.14 I					0.17 I					0.15 I	0.16 I										
Iron	mg/L	0.048	0.013 I	0.619	0.069	0.053	0.084	0.099	0.128	0.14	0.253	0.025	0.029	0.012 I	0.174	2.5	0.021	0.005 I	0.024	0.118	0.007 I	0.005 U		
Manganese	mg/L	0.004	0.0022	0.0041	0.0027	0.002	0.0038	0.0024	0.0044	0.0033	0.0192	0.01	0.0022	0.002 I	0.004	0.0094	0.0005 U	0.0005 U	0.0019 I	0.004	0.0005 U	0.0005 U		
Silver	mg/L	0.001 U	0.001 U					0.001 U					0.001 U	0.001 U										
Sulfate	mg/L	40	27					27					34	26										
Zinc	mg/L	0.004 U	0.004 U					0.037					0.004 U	0.004 U										
Color	color units	14	11	7	6	8	4	4	3 U	5	10	12	13	11	10	10	5	3	10	12	3	7		
Odor	T.O.N. @40c	0	0	16	3	40	3	0	0	0	2	2	4	0	80	3	1	0	80	60	0	0		
pH	pH unit	7.94	7.74	7.45	7.51	7.42	7.41	7.83	7.62	7.67	7.74	7.78	7.73	7.52	7.6	7.52	7.78	7.85	7.33	7.36	7.78	7.88		
TDS	mg/L	327	292	248	274	278	290	300	300	308	342	340	346	320	272	266	320	312	238	266	300	328		
Foaming agents	mg/L	0.04 I	0.08 I					0.04 I					0.03 I	0.03 I										
Free Chlorine Residual	mg/L																							
Alkalinity	mg/L			188	179	186	186		187	185	185	186			189	184	190	188	184	185	195	188		
Hardness	mg/L			200	207	197	213		197	197	209	208			199	198	201	195	195	213	194	1 U		
Calcium	mg/L			45.7	52.2	48.7	54.6		48.4	48.7	52.6	52.2			48.6	45.9	49.3	48.3	48	54.6	48	0.33		
Magnesium	mg/L																							

Leisure Lakes

		4/13/09		6/25/10	8/9/10	9/8/10	9/29/10	9/29/10	9/29/10	9/29/10	10/14/10	10/14/10	10/14/10	10/14/10	10/18/10	11/16/10	11/16/10	11/16/10	11/16/10	11/16/10	12/8/10	12/21/10	12/21/10	12/21/10	12/21/10
				12:35	12:20	9:20	14:05	14:08	15:10	14:15	13:00	13:05	13:20	13:25	12:30	12:50	12:45	12:55	13:08	13:12	12:20	11:20	11:30	11:40	12:00
		Base Line	Base Line	POE	POE	POE	DWTP-	DWTP-	15	#2 Pine	Inside well	outside	15	#2 Pine	POE	POE	DWTP-	DWTP-	13	#2 Pine	POE	DWTP-	DWTP-	52	Clubhous
Aluminum	mg/L	0.02 U		0.02 U	0.02 U	0.02 U			0.02 U	0.08 I					0.02 U	0.02 U					0.02 U				
Chloride	mg/L	37	37	42	46	39			36	36					38	39					39				
Copper	mg/L	0.007 I		0.027	0.034	0.02			0.018	0.066					0.018	0.022					0.055				
Fluoride	mg/L	0.15 I	0.15	0.18 I	0.16 I	0.15 I			0.14 I	0.12 I					0.14 I	0.16 I					0.15 I				
Iron	mg/L	0.084	0.17	0.059	0.075	0.086	0.114	0.308	0.243	2.96	0.187	0.084	0.062	0.062	0.08	0.07	0.216	0.104	0.134	0.165	0.051	0.186	0.086	0.122	0.055
Manganese	mg/L	0.0053	0.005	0.0046	0.0045	0.0054			0.0079	0.0464	0.0031	0.0048	0.0034	0.0034	0.005	0.0098	0.0045	0.0051	0.0051	0.0055	0.0027	0.004	0.0049	0.0034	0.009
Silver	mg/L	0.001 U		0.001 U	0.001 U	0.001 U			0.001 U	0.001 U					0.001 U	0.001 U					0.001 U				
Sulfate	mg/L	45	45	50	47	47			42	43					44	48					44				
Zinc	mg/L	0.004 U		0.013 I	0.013 I	0.01 I			0.051	0.018					0.005 U	0.005 U					0.008 I				
Color	color units	1 U		10	8	3 I			2	1 U	10	11	5	1 U	8	5	8	12	1 U	1 U	4	10	10	4	3
Odor	T.O.N. @50c	0		2	0 U	0 U			0	0	300	40	0 U	0 U	0	0	40	3	0	0	0	40	0	10	1
pH	pH units	7.6	7.4	6.97	7.41	6.81	7.43	7.6	7.02	6.93	7.27	7.48	6.94	6.83	6.76	7.29	7.48	7.47	7.03	6.97	7.02	7.47	7.55	7.22	7.2
TDS	mg/L	298	298	296	297	270			274	296	274	264	272	274	264	262	260	248	280	260	287	268	250	254	252
Foaming agents	mg/L	0.03 I		0.02 U	0.02 U	0.02 U			0.02 U	0.02 U					0.02 U	0.02 U					0.02 U				
Free Chlorine Residual	mg/L									1															
Alkalinity	mg/L		154				175	156			208	158	129	127			185	152	130	130		170	156	125	124
Hardness	mg/L		180				206	194			208	186	199	204			206	194	205	203		205	197	203	203
Calcium	mg/L						53.2	50			53.5	47	50.9	52			53	49	52.1	51.6		52.5	49.7	51.9	51.6
Magnesium	mg/l						17.6	16.9			18	16.7	17.6	18											

Lake Rosalie Oaks

		6/28/10	7/27/10	8/16/10	9/21/10	10/26/10	10/26/10	10/26/10	11/3/10	11/3/10	11/3/10	11/17/10	11/17/10	11/17/10	12/13/10	12/13/10	12/13/10	12/27/10	12/27/10	12/27/10
		12:45	12:15	12:20	12:15	12:40	12:15	12:25	12:00	12:15	12:25	11:30	11:40	11:45	12:40	12:20	12:30	11:50	11:35	11:25
		POE	POE	POE	POE	Well-Raw	Lot #22	Lot #106	Lot #34	Lot #67	Well	Lot #10	Lot #67	Well	Well	Lot #55	Lot #63	Well	Lot #53	Lot #10
Aluminum	mg/L	0.061 U	0.061 U	0.061 U	0.061 U															
Chloride	mg/L	14	4.4 I	15	64															
Copper	mg/L	0.0032	0.00036 I	0.00095	0.00087															
fluoride	mg/L	0.082 I	0.081 I	0.066 I	0.065 I															
Iron	mg/L	0.049 I	0.09 I	0.043 I	0.05 I	0.057 I	0.12 I	0.044 I	0.05 I	0.12 I	0.038 U	0.079 I	0.044 I	0.038 U	0.038 I	0.055 I	0.055 I	0.038 U	0.2	0.4
Manganese	mg/L	0.00073 I	0.0041	0.00095 I	0.0011															
Silver	mg/L	0.000086 U	0.000086 U	0.000086 U	0.000086 U															
Sulfate	mg/L	2.1 U	2.1 U	2.1 U	2.1 U															
Zinc	mg/L	0.0072	0.011	0.0068	0.0093															
Color	color units	3	3 U	3 U	3	3 U	3 U	3.7	10	11	9	3 U	3.1	3 U	3.4	3 U	3 U	2.7 U	2.7 U	2.7 U
Odor	T.O.N.@4 0c	1 U	1 U	1 U	1 U	2	1 U	1 U	1 U	1 U	2	1 U	1 I	1 U	1 U	1 U	1 U	1 U	1 U	1 U
pH	pH unit	8.09	7.61	7.52	8.3	7.81	7.75	7.71	7.85	6.94	7.85	7.58	7.67	7.67	7.81	7.87	7.94	7.46	7.53	7.45
TDS	mg/L	110	86	110	210	98	100	110	82	82	80	120	110	96	78	94	96	100	120	130
Surfactants - MBAS	mg/L	0.14 I	0.12 I	0.066 I	0.057 I															
Calcuim Hardness	mg/L					49	49	52	53	43	46	45	45	44	48	49	49	46	45	44
Total Hardness (as CaCO3)						77	77	81	82	68	73	70	70	69	75	76	76	73	72	69
Alkalinity, Total	mg/L					44	75	75	75	76	49	74	73	74	75	76	76	75	71	77

Tangerine

		7/15/09	6/30/10	7/14/10	8/24/10	9/8/10	9/24/10	9/24/10	9/24/10	9/24/10	9/28/10	9/29/10	9/29/10	9/29/10	10/5/10	10/6/10	10/6/10	10/6/10	10/21/10	10/21/10	10/21/10	10/21/10	10/28/10	10/28/10	10/28/10	10/28/10
		10:30	8:10	10:00	10:20	9:30	9:14	9:29	9:36	0654	11:12	11:04	10:35	11:42	10:00	10:00	10:00	10:00	10:56	11:05	11:43	11:25	10:04	9:56	10:30	9:39
		Base Line Data	POE	POE	POE	POE	WQP-1	Well #1 Raw	Well #2 Raw	S/P-2	Well #1 Raw	Well #2 Raw	S/P-2	S/P-2	POE	POE	POE	POE	Well #1	Well #2	WQP Site 1	S/P-2	Well #1	Well #2	WQP Site 1	S/P-2
pH	pH unit	8.16	7.3		8.08	8.24	7.7	7.6	7.8	7.7	7.8	7.8	7.6	7.8	8.1				7.9	8	8	7.9	8	7.9	7.9	7.9
Temp							27.8	24.7	24.6	27.3	24.5	24.7	26.1	26.1					24.1	24.1	24.4	23.6	24	23.8	24.5	24.2
chloride	mg/L	58	8.8		79	19	0.8	8	0	0.9	0	0	1.9	1.9	21				0	0	1.7	1.5	0	0	1.9	2
Color	color units	4	2 I		3	2					2 I	5	1 U	1 U	3				5	7	1 U	1 U	2 I	2 I	1 U	2
PO4							0.6			0.8			1	1					0	0	1	1	0	0	0.8	0.8
Total Hardness (as CaCO3)							116	127	110	140	130	107	113	113					119	119	123	141	130	106	116	117
Alkalinity, Total	mg/L						115	117	116	117	107	113	113	113					102	108	110	113	112	109	107	108
Calcuim Hardness	mg/L																									
Calcium							46.8	50.3	46.2	53.7	52	44.6	45.6	45.6					47.4	45.7	48.8	55.8	51.6	44.2	48.4	46.8
Odor	T.O.N. @40c		2 I		1 U	1 U					2 I	2 I	1 U	1 U				1 U	2 I	1 I	1 I	1 I	1 I	2 I	1 U	1 U
TDS	mg/L	180	192		178	190					149	138	45.6	160	170				176	156	180	190	180	160	188	196
Iron	mg/L	0.017	0.031 I		0.028	0.028	0.025 I	0.028 I	0.039 I	0.029 I	0.036 I	0.022 I	0.02 U	0.02 U		0.029			0.031 I	0.027 I	0.02 U	0.02 U	0.051 I	0.024 I	0.029 I	0.033 I
Manganese	mg/L	0.0005 U		0.001 U	0.00057 I	0.0005 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.00065 I			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Aleminum	mg/L	0.0036	0.05 U		0.0088 I	0.0024 I										0.011 I										
Copper	mg/L	0.0009 I	0.0075 I		0.0007 U	0.0014 I										0.0015 I										
Silver	mg/L	0.0005 U	0.001 U		0.0005 U	0.0005 U										0.0025 U										
Zinc	mg/L	0.002 U	0.009 U		0.0032 I	0.003 I										0.0029 I										
fluoride	mg/L	0.11	0.17		0.14	0.17									0.13											
Sulfate	mg/L	7.3	1 U		3.3	6.6																				
foaming agents	mg/L	0.023	0.05 U		0.076	0.044									0.022 U											

		11/3/10	11/16/10	11/16/10	11/16/10	11/16/10	11/23/10	11/23/10	11/23/10	11/23/10	12/2/10	12/14/10	12/14/10	12/14/10	12/14/10	12/14/10	12/28/10	12/28/10	12/28/10	12/28/10
		10:40	10:37	10:27	10:14	10:58	10:27	11:22	11:05	11:56	10:20	9:58	10:10	9:43	10:28	10:20	10:26	11:00	10:42	
		POE	Well #1	Well #2	WQP Site 1	S/P-2	Well #2	Well #1	WQP Site	S/P-2		Well #1	Well #2	WQP Site	S/P-2	Well #1	Well #1	Well #2	WQP Site	S/P-2
pH	pH unit	8	7.9	7.8	7.8	8	7.9	8	7.9	8	8.12	7.8	7.9	7.9	8.1	8.1	8	8.1	8.1	
Temp			23.8	23.8	23.7	22.9	23.9	24	23.1	22.8		21.4	21.5	23.9	26.7	20.5	20.5	15.2	14.7	
chloride	mg/L	22	0	0	1.2	1.3	0	0	1.4	0.9	20	0	0	2.1	1.8	0	0	2.1	1.7	
Color	color units	2	2 I	1 I	1 I	1 U	1 I	5	2 I	1 U	3	5	3	2 I	1 U	3	5	2 I	1 U	
PO4			0	0	0.8	0.8	0	0	0.9	0.9		0	0	0.8	0.8	0	0	0.8	0.8	
Total Hardness (as CaCO3)			120	103	106	107	119	118	112	115		110	112	107	104	119	115	110	118	
Alkalinity, Total	mg/L		105	108	110	110	110	104	113	109		114	109	112	110	96.8	105	108	109	
Calcuim Hardness	mg/L																			
Calcium			48.2	41.8	43.2	42.6	47.2	47.6	45.2	46.8		44	44.2	43.6	41.8	47.6	45.8	44.6	45.6	
Odor	T.O.N @40c	1	2 I	1 I	1 I	1 U	4 I	2 I	1 U	1 U	1 U	2 I	1 I	1 U	1 U	2 I	1 I	1 U	1 U	
TDS	mg/L	160	182	166	184	194	154	170	176	186	30000	172	156	176	184	188	180	160	182	
Iron	mg/L	0.024	0.043 I	0.027 I	0.029 I	0.035 U	0.3 U	0.08 I	0.021 I	0.21 I	0.024	0.031 I	0.02 I	0.3 U	0.022 I	0.074 I	0.065 I	0.059 I	0.038 I	
Manganese	mg/L	0.0005 U	7.3	7.6	8.2	9.7	7.7	8.2	9.1	8.6	7E-04	0.87	0.78	0.86	0.88	0.84	0.78	0.87	0.82	
Aluminum	mg/L	0.0034									0.035									
Copper	mg/L	0.0007 U									0.002									
Silver	mg/L	0.0005 U									9E-04 U									
Zinc	mg/L	0.002 U									0.002 U									
fluoride	mg/L	0.16									0.13									
Sulfate	mg/L										8.5									
foaming agents	mg/L	0.022 U									0.05 U									

Tomoka View

		3/10/09	6/24/10	7/20/10	8/4/10	9/9/10	9/17/10	9/17/10	9/17/10	9/17/10	10/13/10	10/14/10	10/14/10	10/14/10	10/14/10	10/27/10	10/27/10	10/27/10	10/27/10	11/9/10	11/9/10	11/9/10	11/9/10	11/9/10
		13:45	12:20	13:45	10:15	11:45	11:35	11:40	12:15	12:20	14:50	11:40	11:50	11:50	11:50	7:10	7:15	7:35	7:35	15:00	15:05	15:10	15:25	15:35
		POE-Base Line Data	POE	POE	POE	POE	Well #1	Well #2	Seminole	Greenbrier	POE	Well #1	Well #2	Greenbrl	Seminole	Well #1	Well #2	Greenbria	Seminole	Well #1	Well #2	Greenbria	Seminole	POE
Aluminum	mg/L	0.003 U	0.05 U	0.05 U	0.05 U	0.05 U					0.05 U													
Copper	mg/L	0.0034	0.071 I	0.013	0.015	0.0074					0.0047 I													
Calcium	mg/L										114	114	113	114	109	108	109	111	116	115	114	114	112
Iron	mg/L	0.025 U	0.0381 I	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.054	0.056	0.009	0.027 I	0.2	0.02 U	0.022 I	0.02 U	0.048	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.046	0.076
Manganese	mg/L	0.038	0.0875	0.0084	0.0086	0.0087	0.0085	0.0085	0.01	0.012	0.0087	0.0088	0.0081	0.009	0.0099	0.0084	0.0872	0.0087	0.0082	0.0089	0.0075	0.0086	0.0098	0.0087
Silver	mg/L	0.001 U	0.0025 U	0.0025 U	0.0025 U	0.0025 U					0.0025 U													
Zinc	mg/L	0.01 U	0.012 I	0.01 U	0.01 U	0.01 U					0.011 I													
Color	color units	20	10	15	15	30					15	15	15	15	15	15	15	10	15	15	15	15	30	15
Temp	C		41.7	39.9	40.2	41.4					40.5	42.1	42.1	42.1	42.1	43.5	43.5	41.2	41.2	40.4	40.4	40.4	40.4	40.4
Threshold Odor Number	TON		100	8	33	4					4	1	2	1	1	1	67	8	4	270	270	17	33	33
Temp	C		27	27	24	27	22	22	22	22	24	25	24	25	24	24	24	24	24	22	22	22	22	22
pH @ 25	std units		7.5	7.5	7.6	7.6	7	7	7.4	7.5	7.8	7.3	7.2	7.6	7.6	7.2	7.1	7.5	7.5	7.2	7.3	7.6	7.8	7.8
TDS	mg/L	550	542	535	537	534					528	529	508	546	546	489	489	511	531	508	499	545	536	530
Surfactants	mg/L	0.035	0.11 I	0.11 I	0.08 I	0.06 I					0.07 I													0.059 U
Chloride	mg/L	110	107	117	118	112					125													129
Fluoride	mg/L	0.12	0.19	0.19	0.17	0.15					0.1													0.16
Sulfate	mg/L	4.7	4.4 U	5	4.8	4.5					4.3													4.1
Cadmium	mg/L	0.0007 U					0.0005 U	0.0005 U	0.0005 U	0.0005 U	U													
Total Hardness (as CaCO3)	mg/L						326	326	336	324		340	339	337	340	325	322	329	331	346	342	340	340	334
Calcium Hardness	mg/L																							
Alkalinity, Total	mg/L						294	294	290	286		293	292	289	295	288	293	291	290	292	282	291	294	
Odor	T.O.N. @40c	2	2																					
pH	pH unit	7.88	7.3																					
Orthophosphate as P	mg/L																			0.16	0.24	0.36	0.33	
Heterotropic Plate Count	CFU/ ml																							

		11/22/10	11/22/10	11/22/10	11/22/10	12/10/10	12/10/10	12/10/10	12/10/10	12/10/10	12/15/10	12/15/10	12/15/10	12/15/10	12/15/10	12/23/10	12/23/10	12/23/10	12/28/10
		13:30	13:35	14:15	14:05	13:10	13:20	13:30	13:38	13:40	13:45	13:50	13:55	14:10	14:20	14:50	13:55	14:10	14:20
		Well #1	Well #2	160	380	380	160	Well #1	Well #2	POE	Well #1	Well #2	POE	380	160	Well #1	Well #2	380	160
Aluminum	mg/L									0.05 U									
Copper	mg/L									15.3									
Calcium	mg/L	112	111	109	111	109	107	107	108							108	110	109	110
Iron	mg/L	0.01 U	0.11	0.02 U	0.038 I	0.046	0.82 U	0.02 U	0.064	0.08						0.02 U	0.02 U	0.095	0.11
Manganese	mg/L	0.0081	0.8075	0.014	0.0094	0.0087	0.0085	0.0086	0.0075	0.0092						0.0082	0.0084	0.01	0.018
Silver	mg/L									0.0025 U									
Zinc	mg/L									0.019 I									
Color	color units	10	15	10	10	30	10	10	20	30	10	10	15	10	15	10	10	15	15
Temp	C	41.9	41.9	41.9	41.9	42.4	42.4	42.4	42.4	42.4						39.9	39.9	39.9	39.9
Threshold Odor Number	TON	133	40	8	8	8	17	285	17	17						540	540	17	17
Temp	C	24	26	25	24	21	22	21	20	24						25	26	28	26
pH @ 25	std units	7.4	7.5	7.7	7.8	7.6	7.6	7.3	7.9	7.8						7.6	7.5	7.7	7.9
TDS	mg/L	501	496	534	544	547	551	508	474	518						500	479	531	549
Surfactants	mg/L									0.081 I									
Chloride	mg/L									121									
Fluoride	mg/L									0.16									
Sulfate	mg/L									4.5									
Cadmium	mg/L																		
Total Hardness (as CaCO3)	mg/L	334	330	325	331	323	320	320	328							328	326	325	327
Calcium Hardness	mg/L																		
Alkalinity, Total	mg/L	285	293	288	296	286	282	292	294							294	290	293	284
Odor	T.O.N. @40c																		
pH	pH unit																		
Orthophosphate as P	mg/L	0.058 I	0.11	0.22	0.3	0.48	0.5	0.087 I	0.05 U										
Heterotropic Plate Count	CFU/ ml			2															

Zephyr Shores

		6/29/10	7/28/10	8/17/10	9/21/10	9/24/10	9/24/10	9/24/10	9/24/10	9/24/10	9/24/10	9/24/10	9/24/10	10/13/10	10/12/10	10/12/10	10/12/10	10/12/10	10/27/10	10/27/10	10/26/10	10/25/10	11/2/10
		7:45	7:30	7:10	7:40	7:45	7:47	7:55	7:57	8:30	8:35	9:05	9:09	14:30	14:48	15:05	15:20	14:51	7:35	7:45	17:30	18:00	7:30
		POE	POE	POE	POE	Well 1	Well 1	Well 2	Well 2	4625	4625	4803	4803	Well 1	Well 2	4643 Sta	Lot 38	POE	Well 1	Well 2	Lot 5	34834 Carl	POE
Aluminum	mg/L	0.061 U	0.061 U	0.061 U	0.061 U													0.061 U					0.061 U
Chloride	mg/L	12	14	13	13													15					11
Copper	mg/L	0.008	0.0036	0.0035	0.0017													0.0026					0.0031
Fluoride	mg/L	0.14 I	0.18 I	0.17 I	0.13 I													0.14 I					0.15 I
Iron	mg/L	0.42	0.13	0.096 I	0.34	0.15 I		0.73		0.14		0.22		0.12 I	0.56	0.038 U	0.038 U	0.19 I	0.14 I	0.42	0.79 I	0.094 I	0.25 I
Manganese	mg/L	0.0048	0.0013	0.0012	0.0008													0.002					0.0027
Silver	mg/L	0.000086 U	0.000086 U	0.000086 U	0.000086 U													0.000086 U					0.000086 U
Sulfate	mg/L	2.1 U	2.9 I	2.1 U	2.1 U													2.1 U					2.1 U
Zinc	mg/L	0.043	0.11	0.056	0.066													0.12					0.071
Color	color units	30	3 U	3 U	3 U									4.2	3.8	3 U	3 U	3 U	3 U	3 U	3 U	3 U	8.9
Odor	T.O.N.@40c	1 U	1 U	1 U	1 U									1	1 U	1 U	1 U	1 U	1	1 U	1 U	1 U	1 U
pH	pH unit	7.22	6.88	6.85	7.22		7.52		7.67		7.08		7.07	6.96	6.8	6.95	6.84	6.9	6.95	6.74	6.78	6.88	7.85
TDS	mg/L	260	280	280	260									280	220	250	240	260	300	230	270	270	270
Surfactants - MBAS	mg/L	0.21	0.15	0.09 I	0.05 U													0.055					0.055
Calcium Hardness	mg/L					210		200		200		200		220	200	200	200		210	200	200	200	
Magnesium Hardness	mg/L					45		17		31		31											
Total Hardness (as CaCO3)						250		210		230		230		260	210	220	230		260	230	240	230	
Alkalinity, Total	mg/L						240		190		220		220	250	180	220	220		240	200	220	220	

		11/3/10	11/3/10	11/5/10	11/5/10	12/9/10	12/13/10	12/13/10	12/13/10	12/13/10	12/27/10	12/27/10	12/27/10	12/27/10
		13:00	14:00	7:45	8:00	7:48	16:45	17:00	16:00	16:25	16:35	16:45	16:00	16:10
		4813 Bobby	34944 Carl	Well 1 Raw	Well 2 Raw	POE	Well 1	Well 2	Lot 87	35055	Well 1	Well 2	Lot 38	3491
Aluminum	mg/L					0.061 U								
Chloride	mg/L					12								
Copper	mg/L					0.017								
Fluoride	mg/L					0.17 U								
Iron	mg/L	0.18 I	0.24	0.1 I	0.21	0.29	0.17 I	0.32	0.48	0.48	0.14 I	0.32	0.058 I	0.12 I
Manganese	mg/L					0.0025								
Silver	mg/L					9E-05 U								
Sulfate	mg/L					0.99 U								
Zinc	mg/L					0.087								
Color	color units	7.4	9.2	8.4	9.3	3 U	5.9	3.1	3 U	3.3	3.9 I	2.7 U	4.8 I	2.7 U
Odor	T.O.N.@40c	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
pH	pH unit	7.26	7.17	7	7.85	6.92	6.89	6.75	6.88	6.93	6.88	6.75	6.7	6.77
TDS	mg/L	260	280	280	230	260	270	240	280	280	290	260	280	280
Surfactants - MBAS	mg/L					0.05 U								
Calcium Hardness	mg/L	210	220	200	180		220	200	220	220	200	180	200	180
Magnesium Hardness	mg/L													
Total Hardness (as CaCO3)		250	260	250	200		290	200	240	240	250	210	230	200
Alkalinity, Total	mg/L	230	140	250	200		250	200	250	240	250	210	220	220

COMPOSITE
EXHIBIT G

			Zephyr Shores	Rosalie Oaks	Lake Josephine	Sebring Lakes	Leisure Lakes	Tomoka View	Tangerine
System Stats	Number of Customers		466	69	538	75	273	263	269
	Current Type Of Treatment		Chlorination	Chlorination	Aeration & Chlorination	Aeration & Chlorination	Aeration & Chlorination	Aeration & Chlorination	Chlorination
	Capacity (GPD)		200,000	100,000	300,000	260,000	72,000	193,000	360,000
	Age of System		~1975	~ 1977	2008 WTP - Distribution ~ 30yr old	~ 1981	Built 1974	Built 1966	Built 1945
	Aqua Supervisor		Gene DeMayo	Gene DeMayo	Gene DeMayo	Gene DeMayo	Gene DeMayo	Paul Thompson	Will Fontaine
	Aqua System Facility Operator		Steve Fuller	Steve Fuller	Eddie Christmas	Eddie Christmas	Eddie Christmas	David Haring	Terry McCarthy
Water Quality Complaints	# of Complaints 6/1/09-3/22/10		30	2	6	1	9	20	16
	Water Quality Issues	Sulfur			X	X	X	X	X
		Manganese	X	X					
		Calcification	X	X	X	X	X	X	X
		Iron	X						X
		Particles	X	X	X	X	X	X	X
Plan of Action	Type Of Treatment Identified		Unidirectional Flushing Program; Sequestering with Aqua Mag	None, adjust flushing to coincide w/ vacancies	AdEdge, merge with Sebring Lakes	AdEdge Pilot, merge with Lake Josephine	Unidirectional Flushing Program; AdEdge	Unidirectional Flushing Program; Chloramination	Sequestering with Aqua Mag, Install chlorine analyser & autodialer, looping deadend mains
	Unidirectional Flushing Upgrades Needed		Install Isolation Valves & Blow Offs	Extend water line and install additional Blow Offs	None identified prior to merge with Sebring Lakes	None identified prior to merge with Lake Josephine	No additional installation work identified	Install Isolation Valves & Blow Offs	Install Isolation Valves & Blow Offs
	DEP permitting necessary		Yes, for sequestration	No	Yes, to merge systems & installation of AdEdge	Yes, to merge systems & installation of AdEdge	Yes, for AdEdge	Yes, for chloramination	Yes, for sequestration
	WMD permitting necessary		N/A	N/A	Yes	Yes	N/A	N/A	N/A
	Distribution System Improvements		$ 500	$ 6,600	$ 6,139.00		$ 14,788.00	$ 39,362.00	
	Cost of additional treatment		$10,000		$150,000	$150,000	$ 150,000	$ 13,610	$ 9,500
	Cost of additional line looping								$ 90,000
	Expected Results of Solution		Remove iron & sediments from distribution system, give water "soft" appearance	Provide fresher water to customers prior to return to system	Improve pressure problems, remove hydrogen sulfide	Improve pressure problems, remove hydrogen sulfide	Remove sediment and scour distribution system, remove hydrogen sulfide	Remove sediment and scour distribution system,Chloramination to control TTHMs	Improve pressure problems, give water "soft" appearance, remove sediment from distribution system

Note: Sebring Lakes & Lake Josephine systems have been combined into one system

AQUA.

Aqua Utilities Florida
Secondary Water Quality Project Report
July 2010

Lake Josephine & Sebring Lakes

Aqua Utilities Florida (Aqua) owns and operates dozens of separate small water and wastewater systems throughout the state that are not interconnected. When Aqua acquired these systems, we focused first on full environmental compliance, now nearly completed. IN an effort to further improve our customer service, Aqua has been assessing ways to enhance the "secondary" or aesthetic characteristics of our water.

Lake Josephine and Sebring Lakes is a community of about 553 and 76 customer respectively in Highlands County. Aqua surveyed customers in Lake Josephine and Sebring Lakes in December 2009.

Aqua determined that the aesthetic water quality issue in Lake Josephine and Sebring Lakes primarily involved a sulfur odor. Aqua plans to install an AdEdge treatment system at Lake Josephine and Sebring Lakes to eliminate the naturally occurring sulfur in the water. We expect that this project will be operational by December 31st.

Aqua also received customer complaints from Lake Josephine RV Park and Camp Ground of low water pressure. Aqua's field personnel and engineering conducted a review of the distribution system and determine an Interconnection between Sebring Lakes with Lake Josephine was necessary to improve water pressure. Aqua permitted the interconnection with DEP and the Water Management District and the interconnection was opened permanently and water pressure complaints have been eliminated.

Laboratory Report

SEBRING LAKES WELL#1

Company Address: Aqua Utilities Florida, Inc.
1616 Wendel Kent Road
Sarasota, FL 34240
Phone # : 941-377-9456

Collection Date: 4/20/09
Collection Time: 10:20
PWS I.D :
Entry Pt. # :
Sample ID : AC17018

Analyte Name	Result	Units	Analysis Date	Reporting Limit	Method Reference
Analysis Group: PH_TURBIDITY					
Turbidity	0.24	NTU	4/21/09	0.10	SM 2130B
Analysis Group: ANIONS					
Sulfate	N.D.	mg/L	4/22/09	10	EPA 300.0
Analysis Group: METALS					
Iron	0.18	mg/L	4/22/09	0.10	EPA 200.8
Iron-Dissolved	N.D.	mg/L	4/22/09	0.10	EPA 200.8
Manganese	N.D.	mg/L	4/22/09	0.01	EPA 200.8
Manganese_Dissolved	N.D.	mg/L	4/22/09	0.01	EPA 200.8
Analysis Group: INORGANIC_COMPOUNDS					
Alkalinity	108	mg/L	4/22/09	5.0	SM 2320B
Hardness	113	mg/L	4/22/09	10	SM 2340C
Total Organic Carbon	1.2	mg/L	4/22/09	1.0	SM 5310C
Analysis Group: SOLIDS					
Total Dissolved Solids	122	mg/L	4/22/09	20	SM 2540C
Total Solids	138	mg/L	4/22/09	20	SM 2540 B

N. D. = Not Detected

Approved By:_____ Date:_____

Report Date : 4/23/2009

Laboratory Report

LAKE JOSEPHINE WELL#2

Company Address: Aqua Utilities Florida, Inc.
1616 Wendel Kent Road
Sarasota, FL 34240
Phone # : 941-377-9456

Collection Date: 4/20/09
Collection Time: 10:55
PWS I.D :
Entry Pt. # :
Sample ID : AC17017

Analyte Name	Result	Units	Analysis Date	Reporting Limit	Method Reference
Analysis Group: PH_TURBIDITY					
Turbidity	1.2	NTU	4/21/09	0.10	SM 2130B
Analysis Group: ANIONS					
Sulfate	N.D.	mg/L	4/22/09	10	EPA 300.0
Analysis Group: METALS					
Iron	0.60	mg/L	4/22/09	0.10	EPA 200.8
Iron-Dissolved	N.D.	mg/L	4/22/09	0.10	EPA 200.8
Manganese	0.04	mg/L	4/22/09	0.01	EPA 200.8
Manganese_Dissolved	0.03	mg/L	4/22/09	0.01	EPA 200.8
Analysis Group: INORGANIC_COMPOUNDS					
Alkalinity	170	mg/L	4/22/09	5.0	SM 2320B
Hardness	185	mg/L	4/22/09	10	SM 2340C
Total Organic Carbon	2.9	mg/L	4/22/09	1.0	SM 5310C
Analysis Group: SOLIDS					
Total Dissolved Solids	192	mg/L	4/22/09	20	SM 2540C
Total Solids	238	mg/L	4/22/09	20	SM 2540 B

N. D. = Not Detected

Approved By:_____ Date:_____

AQUA.

Aqua Utilities Florida
Secondary Water Quality Project Report
July 2010

Leisure Lakes

Background

Aqua Utilities Florida (Aqua) owns and operates dozens of separate small water and wastewater systems throughout the state that are not interconnected. When Aqua acquired these systems, we focused first on full environmental compliance, now nearly completed. In an effort to further improve our customer service, Aqua has been assessing ways to enhance the "secondary", or aesthetic characteristics of our water.

Leisure Lakes is a community of about 273 Aqua customers in Highlands County. Aqua surveyed customers in Leisure Lakes in December 2009.

Solution

Aqua determined that the aesthetic water quality issues in Leisure Lakes primarily involved a sulfur odor. Aqua plans to install an AdEdge treatment system at Leisure Lakes to eliminate the naturally occurring sulfur in the water. We expect that this project will be operational by December 31st.

We also enhanced our existing flushing plan. Directional flushing takes place on a monthly basis.

SHORT Environmental Laboratories, Inc.
10405 U S 27 S Sebring, FL 33876 (863) 655-4022
800 833-4022 Shortlab@strato.net fax (863) 655-5820

Report Cover Page

Client:	Short Utility Service, Inc.		
Address:	P.O. Box 1088		
City, St, Zip:	Sebring, Fl 33871-1088	Report #:	2009050167
Attention:	Wendell Faircloth	Report Date:	5/15/2009
Project	Leisure Lakes		
	Inorganics, Secondaries, VOCs, SOCs, Radiologicals		
Sample date	April 13, 2009		
Sample #'s	331699		

This report package includes the following contents and attachments.

	Item	Pages
Cover Page		1
Report of Analysis	DW Original	7
Attachments:	Chain of Custody	1
	Sampler cert	1
Total Pages:		10

Commonly used Qualifiers with explanations:

Qualifier	Explanation
U	Compound was analyzed for but not detected.
1	Result is between the PQL and the MDL.
Q	Sample was analyzed out of holding time.
J	Estimated value: value may not be accurate.

The results contained in this report meet all requirements of the NELAC standards. All results are representative of the sample as collected. Direct all questions to the signatory below at the phone number above.

Respectfully Submitted,

David W. Morto
Laboratory Director

FL CERT # E83435

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

Secondary Contaminants

62-550.320

Report Number/Job ID: 331699

PWS ID (From Page 1): 6280064

Contam ID	Contaminant Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification#
1002	Aluminum	0.20	mg/L	0.02	U	EPA 200.7	0.02	4/16/2009	0832	E85458
1017	Chloride	250	mg/L	37		EPA 325.3	0.5	4/15/2009	0921	E85458
1022	Copper	1	mg/L	0.007	I	EPA 200.7	0.002	4/16/2009	0832	E85458
1025	Fluoride	2.00	mg/L	0.15	I	SM4500F-C	0.05	5/6/2009	1015	E85458
1028	Iron	0.30	mg/L	0.094		EPA 200.7	0.005	4/16/2009	0832	E85458
1032	Manganese	0.05	mg/L	0.0053		EPA 200.7	0.0005	4/16/2009	0832	E85458
1050	Silver	0.10	mg/L	0.001	U	EPA 200.7	0.001	4/23/2009	0755	E85458
1055	Sulfate	250	mg/L	45.		EPA 375.4	1.	4/16/2009	1013	E85458
1095	Zinc	5	mg/L	0.004	U	EPA 200.7	0.004	4/16/2009	0832	E85458
1905	Color	15	CU	1.	U	SM 2120 B	1.	4/14/2009	1545	E85458
1920	Odor	3	TON	0.		SM 2150 B	1.	4/13/2009	1614	E85458
1925	pH (field pH from page 1)	6.5 - 8.5	SU	7.4		EPA 150.1	0.1	4/13/2009	0730	E85458
1930	Total Dissolved Solids	500	mg/L	298.		SM 2540 C	10.	4/17/2009	1158	E85458
2905	Foaming Agents	0.50	mg/L	0.03	I	SM 5540 C	0.02	4/15/2009	0700	E85458

All results meet the requirements of NELAC.

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, 0, T, Z, ?, *, are unacceptable for compliance with 62.550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

Inorganic Contaminants

62-550.310(1)

Report Number/Job ID: 331699

PWS ID (from page 1): 6280064

Contam ID	Contaminant Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification #
1040	Nitrate (as N)	10	mg/L	0.12		EPA 353.2	0.02	4/15/2009	1111	E85458
1041	Nitrite (as N)	1	mg/L	0.01	U	EPA 353.2	0.01	4/14/2009	1150	E85458
1005	Arsenic	0.01	mg/L	0.003	U	SM 3113 B	0.002	4/28/2009	1131	E85458
1010	Barium	2	mg/L	0.113		EPA 200.7	0.002	4/16/2009	0832	E85458
1015	Cadmium	0.005	mg/L	0.001	U	EPA 200.7	0.001	4/16/2009	0832	E85458
1020	Chromium	0.10	mg/L	0.001	U	EPA 200.7	0.001	4/16/2009	0832	E85458
1024	Cyanide	0.20	mg/L	0.005	U	EPA 335.4	0.005	4/20/2009	0805	E85458
1025	Fluoride	4.0	mg/L	0.15	I	SM4500F-C	0.05	5/6/2009	1015	E85458
1030	Lead	0.015	mg/L	0.001	U	SM 3113 B	0.001	4/16/2009	0730	E85458
1035	Mercury	0.002	mg/L	0.0002	U	EPA 245.1	0.0002	4/23/2009	0731	E85458
1036	Nickel	0.10	mg/L	0.002	U	EPA 200.7	0.002	4/16/2009	0832	E85458
1045	Selenium	0.05	mg/L	0.005	U	SM 3113 B	0.005	4/20/2009	0816	E85458
1052	Sodium	160	mg/L	9.33		EPA 200.7	0.05	4/23/2009	0755	E85458
1074	Antimony	0.006	mg/L	0.003	U	SM 3113 B	0.003	4/28/2009	1131	E85458
1075	Beryllium	0.004	mg/L	0.0005	U	EPA 200.7	0.0005	4/16/2009	0832	E85458
1085	Thallium	0.002	mg/L	0.001	U	EPA 200.9	0.001	4/22/2009	0753	E85458
1094	Asbestos	7 MFL	MFL							

All results meet the requirements of NELAC.

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table I. Results qualified with A, F, H, N, O, T, Z, ?, are unacceptable for compliance with 62-550. Results qualified with J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

Volatile Organics

Report Number/Job ID: 331699

62-550.310(4)(a)

PWS ID (from page 1): 6280064

Contam ID	Contaminant Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	RDL	Analysis Date	Analysis Time	DOH Lab Certification #
2378	1,2,4-Trichlorobenzene	70	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2380	cis-1,2-Dichloroethylene	70	ug/L	0.2	U	EPA 502.2	0.2	0.50	4/16/2009	1346	E84129
2955	Xylenes (total)	10,000	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2964	Dichloromethane	5	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2968	o-Dichlorobenzene	600	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2969	para-Dichlorobenzene	75	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2976	Vinyl Chloride	1	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2977	1,1-Dichloroethylene	7	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2979	trans-1,2-Dichloroethylene	100	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2980	1,2-Dichloroethane	3	ug/L	0.2	U	EPA 502.2	0.2	0.50	4/16/2009	1346	E84129
2981	1,1,1-Trichloroethane	200	ug/L	0.3	U	EPA 502.2	0.3	0.50	4/16/2009	1346	E84129
2982	Carbon tetrachloride	3	ug/L	0.3	U	EPA 502.2	0.3	0.50	4/16/2009	1346	E84129
2983	1,2-Dichloropropane	5	ug/L	0.3	U	EPA 502.2	0.3	0.50	4/16/2009	1346	E84129
2984	Trichloroethylene	3	ug/L	0.2	U	EPA 502.2	0.2	0.50	4/16/2009	1346	E84129
2985	1,1,2-Trichloroethane	5	ug/L	0.3	U	EPA 502.2	0.3	0.50	4/16/2009	1346	E84129
2987	Tetrachloroethylene	3	ug/L	0.2	U	EPA 502.2	0.2	0.50	4/16/2009	1346	E84129
2989	Monochlorobenzene	100	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2990	Benzene	1	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2991	Toluene	1,000	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2992	Ethylbenzene	700	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129
2996	Styrene	100	ug/L	0.5	U	EPA 502.2	0.5	0.50	4/16/2009	1346	E84129

All results meet the requirements of NELAC.

* Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table I. Results qualified with a A, F, H, N, O, T, 2, ?,*, are unacceptable for compli with 65.550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples during the same monitoring period.

Florida Department of Environmental Protection

Safe Drinking Water Program Laboratory Reporting Format

Radionuclides

Report Number / Job ID: 331699

62-550.310(6)

PWS ID (From Page 1): 6280064

Contam ID	Contaminant Name	MCL	Units	Analysis Results	Qualifier*	Analytical Method	Lab MDL	RDL	Analysis Error	Analysis Date	Analysis Time	DOH Lab Certification #
4000	Gross Alpha (Excl Uranium)	15***	pCi/L	2.0	U	900.0 - D5174	2	3	1.9	4/28/2009	1729	E84129
4002	Gross Alpha (Incl Uranium)	***	pCi/L	2.0	U	EPA 900.0	2	3	1.9	4/20/2009	1459	E84129
4006	Combined Uranium	****	pCi/L	0.04	U	ASTM D5174	0.04	0.667		4/28/2009	1729	E84129
	(U-234, U-235, & U-238)	30	ug/L					1				E84129
4020	Radium - 226	5	pCi/L	1.0		EPA 903.1	0.05	1	0.2	4/23/2009	1545	E84129
4030	Radium - 228			0.2	U	EPA Ra-05	0.2	1	0.2	4/27/2009	1634	E84129

** If the results exceed 5 pCi/L, a measurement for radium-226 is required.

*** If the results exceed 5 pCi/L, a measurement for radium-226 is required. If the results exceed 15 pCi/L, measurements for radium-226 and uranium are required.

**** If uranium (U) is reported as a measurement of activity (pCi/L) it will be converted to a mass measurement (ug/L) by multiplying the result by 1.5.

All results meet the requirements of NELAC, except as noted.

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table I. Results qualified with A, F, H, N, B, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

Synthetic Organics
62-550.310(4)(b)

Report Number/Job ID: 331699
PWS ID (From Page 1): 6280064

Contam ID	Contaminant Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	RDL	Extraction Date	Analysis Date	Analysis Time	DOH Lab Certification#
2005	Endrin	2	ug/L	0.1	U	EPA 525.2	0.1	0.01	4/17/2009	4/17/2009	1634	E84129
2010	Lindane	0.20	ug/L	0.06	U	EPA 525.2	0.06	0.02	4/17/2009	4/17/2009	1634	E84129
2015	Methoxychlor	40	ug/L	0.05	U	EPA 525.2	0.05	0.10	4/17/2009	4/17/2009	1634	E84129
2020	Toxaphene	3	ug/L	0.5	U	EPA 508.1	0.5	1	4/17/2009	4/20/2009	1945	E84129
2031	Dalapon	200	ug/L	1.	U	EPA 515.3	1.	1	4/17/2009	4/20/2009	1543	E84129
2032	Diquat	20	ug/L	1.	U	EPA 549.2	1.	0.4	4/18/2009	4/20/2009	1413	E84129
2033	Endothall	100	ug/L	20.	U	EPA 548.1	20.	9	4/18/2009	4/22/2009	1943	E84129
2034	Glyphosate	700	ug/L	10.	U	EPA 547	10.	6		4/20/2009	1227	E84129
2035	Di(2-ethylhexyl)adipate	400	ug/L	0.3	U	EPA 525.2	0.3	0.6	4/17/2009	4/17/2009	1634	E84129
2036	Oxamyl (Vydate)	200	ug/L	0.5	U	EPA 531.1	0.5	2		4/17/2009	2352	E84129
2037	Simazine	4	ug/L	0.07	U	EPA 525.2	0.07	0.07	4/17/2009	4/17/2009	1634	E84129
2039	Di(2-ethylhexyl)phthalate	6	ug/L	1.	U	EPA 525.2	1.	0.6	4/17/2009	4/17/2009	1634	E84129
2040	Picloram	500	ug/L	0.75	U	EPA 515.3	0.75	0.1	4/17/2009	4/20/2009	1543	E84129
2041	Dinoseb	7	ug/L	0.5	U	EPA 515.3	0.5	0.2	4/17/2009	4/20/2009	1543	E84129
2042	Hexachlorocyclopentadiene	50	ug/L	0.2	U	EPA 525.2	0.2	0.1	4/17/2009	4/17/2009	1634	E84129
2046	Carbofuran	40	ug/L	0.5	U	EPA 531.1	0.5	0.9		4/17/2009	2352	E84129
2050	Atrazine	3	ug/L	0.06	U	EPA 525.2	0.06	0.1	4/17/2009	4/17/2009	1634	E84129
2051	Alachlor	2	ug/L	0.2	U	EPA 525.2	0.2	0.2	4/17/2009	4/17/2009	1634	E84129
2063	2,3,7,8-TCDD (Dioxin)	0.03	ng/L			EPA 1613B	0.0028	0.805				
2065	Heptachlor	0.40	ug/L	0.08	U	EPA 525.2	0.08	0.04	4/17/2009	4/17/2009	1634	E84129
2067	Heptachlor Epoxide	0.20	ug/L	0.1	U	EPA 525.2	0.1	0.02	4/17/2009	4/17/2009	1634	E84129
2105	2,4-D	70	ug/L	1.	U	EPA 515.3	1.	0.1	4/17/2009	4/20/2009	1543	E84129
2110	2,4,5-TP (Silvex)	50	ug/L	0.25	U	EPA 515.3	0.25	0.2	4/17/2009	4/20/2009	1543	E84129
2274	Hexachlorobenzene	1	ug/L	0.05	U	EPA 525.2	0.05	0.1	4/17/2009	4/17/2009	1634	E84129
2306	Benzo(a)pyrene	0.20	ug/L	0.1	U	EPA 525.2	0.1	0.02	4/17/2009	4/17/2009	1634	E84129
2326	Pentachlorophenol	1	ug/L	0.1	U	EPA 515.3	0.1	0.04	4/17/2009	4/20/2009	1543	E84129
2383	Polychlorinated biphenyls (PCBS)	0.50	ug/L	0.2	U	EPA 508.1	0.2	0.1	4/17/2009	4/20/2009	1945	E84129
2931	Dibromochloropropane	0.20	ug/L	0.005	U	EPA 504.1	0.005	0.02	4/24/2009	4/25/2009	0225	E84129
2946	Ethylene Dibromide (EDB)	0.02	ug/L	0.005	U	EPA 504.1	0.005	0.01	4/24/2009	4/25/2009	0225	E84129
2959	Chlordane	2	ug/L	0.05	U	EPA 508.1	0.05	0.2	4/17/2009	4/20/2009	1945	E84129

All results meet the requirements of NELAC unless otherwise noted.

* Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table I. Results qualified with A, F, H, N, O, T, 2, 3, 5, or Y are unacceptable for compliance with 62-550. Results qualified with a J, Q, X, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a unnecessary violation, unacceptable results must be repeated with acceptable results from samples collected during the same monitoring period.

AQUA

Aqua Utilities Florida
Secondary Water Quality Project Report
July 2010

Rosalie Oaks Water System

Rosalie Oaks is a community of about 89 Aqua Utilities Florida customers in Polk County.

In the past year, Aqua has worked to tackle the aesthetic qualities — the look, smell and taste — of tap water in the system. Although these aesthetic qualities are considered "secondary" water quality standards, and Aqua has not exceeded the secondary standards for iron, manganese, alkalinity, and hardness. Aqua has moved forward with initiatives to address customer concerns.

Minerals and sediments in the Rosalie Oaks water sometimes can cause a black ring to form in toilets. These sediments can accumulate when water rests in pipes — a particular problem when weekend and seasonal customers are away for long periods of time. Aqua determined that an extensive new water main flushing program should keep the water moving more consistently and improve its smell and appearance. Aqua's contractor installed two new flushing valves last fall, and the local operator launched an aggressive new flushing schedule in October. At first, Aqua flushed the system weekly to clean the pipes thoroughly. Currently, operators flush the system monthly and before holidays.

Many Rosalie Oaks residents are "seasonal customers" — they live elsewhere during the summer months and return to Florida for the winter. That means water can sit in their service line or household plumbing for months, creating odors and discolored water. Customers might need to flush water through their fixtures and household plumbing after water has been standing in the pipes for an extended period of time.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

PUBLIC WATER SYSTEM INFORMATION (to be completed by sampler -- Please type or print legibly)

System Name: Rosalie Oaks PWS I.D.#: 3 5 3 1 5 4 6

System Type (check one): ☐ Community ☐ Nontransient Noncommunity ☐ Transient Noncommunity

Address: _____

_____

City: _____ State: _____ ZIP Code: _____

Phone #: _____ Fax #: _____

E-Mail Address: _____

SAMPLE INFORMATION (to be completed by sampler)

Sample Number: T0913508001 Location Code (if known) : _____

Sample Date: 08/31/2009 Sample Time: 11:00 ☒ AM ☐ PM (circle one)

Sample Location (be specific): POE

Disinfectant Residual (Required when reporting results for trihalomethanes and haloacetic acids): _____ mg/L Field pH: 8.18

Sample Type (Check Only One)

- ☐ Distribution
- ☐ Entry Point (to Distribution)
- ☐ Plant Tap (not for compliance with 62-550)
- ☐ Raw (at well or intake)
- ☒ Max Residence Time
- ☒ Ave Residence Time
- ☐ Near First Customer

Reason(s) for Sample (Check all that apply)

- ☐ Routine Compliance (with 62-550)
- ☐ Confirmation of MCL Exceedance *
- ☐ Composite of Multiple Sites **
- ☐ Clearance (permitting)
- ☐ Other: _____
- ☐ Quarterly (Which Quarter? ____)
- ☐ Special (not for compliance with 62-550)
- ☐ Violation Resolution
- ☐ Replacement (of invalidated Sample)

Sampling Procedure Used or Other Comments: _____

*See 62-550.500(6) for requirements and NOTE: See 62-550.512(3) for additional for nitrate or nitrite MCL exceedances.

**See 62-550.550(4) for requirements and attach a results page for each site.

Sampler's Name: _____

Sampler's Phone #: _____ Sampler's Fax #: _____

Sampler's E-Mail Address: _____

CERTIFICATION (to be completed by sampler)

I, _____ (Print Name), _____ (Print Title)

do HEREBY CERTIFY that the above public water system and sample collection information is complete and correct.

Signature: _____ Date: _____

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

SECONDARY CONTAMINANTS
62-550.320

Report Number / Job ID: T0913506001

PWS ID (From Page 1): 3531546

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification #
1002	Aluminum	0.2	mg/L							E
1017	Chloride	250	mg/L							E
1022	Copper	1	mg/L							E
1025	Fluoride	2.0	mg/L							E
1028	Iron	0.3	mg/L							E
1032	Manganese	0.05	mg/L							E
1050	Silver	0.1	mg/L							E
1055	Sulfate	250	mg/L							E
1095	Zinc	5	mg/L							E
1905	Color	15	CU							E
1920	Odor	3	TON							E
1925	pH (field pH from page 1)	6.5 - 8.5								E
1930	Total Dissolved Solids	500	mg/L							E
2905	Foaming Agents	0.5	mg/L	0.075	I	EPA 425.1	0.05	09/02/09	09:45	E82001

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

INORGANIC CONTAMINANTS

62-550.310(1)

Report Number / Job ID: T0913506001

PWS ID (From Page 1): 3531546

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification
1040	Nitrate	10	mg/L	0.13	I	SM 4500NO3-F	0.039	09/02/2009	09:24	E84589
1041	Nitrite	1	mg/L	0.022	U	SM 4500NO3-F	0.022	09/02/2009	09:24	E84589
1005	Arsenic	0.010	mg/L	0.00012	I	EPA 200.8	0.00012	09/15/2009	20:56	E82574
1010	Barium	2	mg/L	0.02		EPA 200.8	0.00027	09/13/2009	22:01	E82574
1015	Cadmium	0.005	mg/L	0.00020	U	EPA 200.8	0.00020	09/13/2009	22:01	E82574
1020	Chromium	0.1	mg/L	0.00050	U	EPA 200.7	0.00050	09/15/2009	10:54	E82574
1024	Cyanide	0.2	mg/L	0.0017	I	SM 4500-CN-E	0.00097	09/08/2009	14:49	E84589
1025	Fluoride	4.0	mg/L	0.075	I	EPA 300.0	0.055	09/02/2009	17:13	E84589
1030	Lead	0.015	mg/L	0.0025		EPA 200.8	0.000037	09/13/2009	22:01	E82574
1035	Mercury	0.002	mg/L	0.000014	U	EPA 245.1	0.000014	09/10/2009	14:53	E82574
1036	Nickel	0.1	mg/L	0.0011	U	EPA 200.7	0.0011	09/15/2009	10:54	E82574
1045	Selenium	0.05	mg/L	0.00063	U	EPA 200.8	0.00063	09/13/2009	22:01	E82574
1052	Sodium	160	mg/L	4		EPA 200.7	0.026	09/15/2009	10:54	E82574
1074	Antimony	0.006	mg/L	0.000091	U	EPA 200.8	0.000091	09/13/2009	22:01	E82574
1075	Beryllium	0.004	mg/L	0.00013	U	EPA 200.7	0.00013	09/15/2009	10:54	E82574
1085	Thallium	0.002	mg/L	0.000026	U	EPA 200.8	0.000026	09/13/2009	22:01	E82574

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

SECONDARY CONTAMINANTS
62-550.320

Report Number / Job ID: T0913508001

PWS ID (From Page 1): 3531546

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification #
1002	Aluminum	0.2	mg/L	0.061	U	EPA 200.7	0.061	09/15/2009	10:54	E82574
1017	Chloride	250	mg/L	4.9	I	EPA 300.0	2.3	09/02/2009	17:13	E84589
1022	Copper	1	mg/L	0.0096		EPA 200.8	0.000085	09/13/2009	22:01	E82574
1025	Fluoride	2.0	mg/L	0.075	I	EPA 300.0	0.055	09/02/2009	17:13	E84589
1028	Iron	0.3	mg/L	0.038	U	EPA 200.7	0.038	09/15/2009	10:54	E82574
1032	Manganese	0.05	mg/L	0.0076		EPA 200.8	0.000073	09/13/2009	22:01	E82574
1050	Silver	0.1	mg/L	0.000086	U	EPA 200.8	0.000086	09/13/2009	22:01	E82574
1055	Sulfate	250	mg/L	2.1	U	EPA 300.0	2.1	09/02/2009	17:13	E84589
1095	Zinc	5	mg/L	0.018		EPA 200.8	0.00041	09/15/2009	20:56	E82574
1905	Color	15	Color Units	4.5	I	SM 2120B	3.2	09/02/2009	10:36	E84589
1920	Odor	3	TON@40°C	1		SM 2150B	1.0	09/01/2009	10:15	E84589
1925	pH	6.5 - 8.5	pH unit	6.18		EPA 150.1		09/02/2009	15:15	E84589
1930	Total Dissolved Solids	500	mg/L	110		EPA 160.1	10	09/04/2009	08:31	E84589

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160 Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

RADIONUCLIDES
62-550.310(6)

Report Number / Job T0913508001

PWS ID (From Page 1): 3531546

Contam ID	Contam-Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	RDL	Analysis Error	Analysis Date	Analysis Time	DOH Lab Certification #
4006	Combined Uranium (U-234,U-235, & U-238)	30	ug/L	0.031	U	EPA 200.8	0.031	0.031		09/13/2009	22:01	E82574

** If the results exceed 5 pCi/L, a measurement for radium-226 is required.

*** If the results exceed 5 pCi/L, a measurement for radium-226 is required. If the results exceed 15 pCi/L, measurements for radium-226 and uranium are required.

**** If uranium (U) is reported as a measurement of activity (pCi/L) it will be converted to a mass measurement (µg/L) by multiplying the result by 1.5.

***** Reserved

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

VOLATILE ORGANICS
62-550.310(4)(a)

Report Number / Job ID: T0913508001
PWS ID (From Page 1): 3531546

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier	Analytical Method	Lab MDL	RDL	Analysis Date	Analysis Time	DOH Lab Certification #
2378	1,2,4-Trichlorobenzene	70	ug/L	0.22	U	EPA 524.2	0.22	0.5	09/06/2009	06:26	E82574
2380	cis-1,2-Dichloroethylene	70	ug/L	0.12	U	EPA 524.2	0.12	0.5	09/06/2009	06:26	E82574
2955	Xylenes (total)	10,000	ug/L	0.37	U	EPA 524.2	0.37	0.5	09/06/2009	06:26	E82574
2964	Methylene Chloride	5	ug/L	0.32	U	EPA 524.2	0.32	0.5	09/06/2009	06:26	E82574
2968	o-Dichlorobenzene	600	ug/L	0.15	U	EPA 524.2	0.15	0.5	09/06/2009	06:26	E82574
2969	para-Dichlorobenzene	75	ug/L	0.26	U	EPA 524.2	0.26	0.5	09/06/2009	06:26	E82574
2976	Vinyl Chloride	1	ug/L	0.46	I	EPA 524.2	0.20	0.5	09/06/2009	06:26	E82574
2977	1,1-Dichloroethylene	7	ug/L	0.17	U	EPA 524.2	0.17	0.5	09/06/2009	06:26	E82574
2979	trans-1,2-Dichloroethylene	100	ug/L	0.27	U	EPA 524.2	0.27	0.5	09/06/2009	06:26	E82574
2980	1,2-Dichloroethane	3	ug/L	0.18	U	EPA 524.2	0.18	0.5	09/06/2009	06:26	E82574
2981	1,1,1-Trichloroethane	200	ug/L	0.20	U	EPA 524.2	0.20	0.5	09/06/2009	06:26	E82574
2982	Carbon tetrachloride	3	ug/L	0.24	U	EPA 524.2	0.24	0.5	09/06/2009	06:26	E82574
2983	1,2-Dichloropropane	5	ug/L	0.21	U	EPA 524.2	0.21	0.5	09/06/2009	06:26	E82574
2984	Trichloroethylene	3	ug/L	0.14	U	EPA 524.2	0.14	0.5	09/06/2009	06:26	E82574
2985	1,1,2-Trichloroethane	5	ug/L	0.28	U	EPA 524.2	0.28	0.5	09/06/2009	06:26	E82574
2987	Tetrachloroethylene	3	ug/L	0.24	U	EPA 524.2	0.24	0.5	09/06/2009	06:26	E82574
2989	Chlorobenzene	100	ug/L	0.19	U	EPA 524.2	0.19	0.5	09/06/2009	06:26	E82574
2990	Benzene	1	ug/L	0.17	U	EPA 524.2	0.17	0.5	09/06/2009	06:26	E82574
2991	Toluene	1,000	ug/L	0.21	U	EPA 524.2	0.21	0.5	09/06/2009	06:26	E82574
2992	Ethylbenzene	700	ug/L	0.13	U	EPA 524.2	0.13	0.5	09/06/2009	06:26	E82574
2996	Styrene	100	ug/L	0.11	U	EPA 524.2	0.11	0.5	09/06/2009	06:26	E82574

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, C, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

SYNTHETIC ORGANICS
62-550.310(4)(b)

Report Number / Job ID: T0913506001
PWS ID (From Page 1): 3531546

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier	Analytical Method	Lab MDL	RDL	Extraction Date	Analysis Date	Analysis Time	DOH Lab Certification
2005	Endrin	2	ug/L	0.0016	U	EPA 508	0.0016	0.01	09/05/2009	09/07/2009	18:16	E82574
2010	gamma-BHC (Lindane)	0.2	ug/L	0.0033	U	EPA 508	0.0033	0.02	09/05/2009	09/07/2009	18:16	E82574
2015	Methoxychlor	40	ug/L	0.011	U	EPA 508	0.011	0.1	09/05/2009	09/07/2009	18:16	E82574
2020	Toxaphene	3	ug/L	0.091	U	EPA 508	0.091	1	09/05/2009	09/07/2009	18:16	E82574
2031	Dalapon	200	ug/L	1.0	U	EPA 515.3	1.0	1	09/03/2009	09/05/2009	15:05	E82574
2032	Diquat	20	ug/L	7.6	U	EPA 549.2	7.6	0.4	09/03/2009	09/08/2009	11:36	E82574
2033	Endothall	100	ug/L	2.8	U	EPA 548.1	2.8	9	09/02/2009	09/04/2009	10:20	E82574
2034	Glyphosate	700	ug/L	6.5	U	EPA 547	6.5	6	09/03/2009	09/03/2009	15:25	E82574
2035	Di(2-ethylhexyl)adipate	400	ug/L	0.95	U	EPA 525.2	0.95	0.6	09/08/2009	09/08/2009	19:10	E82574
2036	Oxamyl (Vydate)	200	ug/L	0.57	U	EPA 531.1	0.57	2	09/04/2009	09/04/2009	21:46	E82574
2037	Simazine	4	ug/L	0.19	U	EPA 525.2	0.19	0.07	09/08/2009	09/08/2009	19:10	E82574
2039	bis(2-Ethylhexyl) phthalate	6	ug/L	1.5	U	EPA 525.2	1.5	0.6	09/08/2009	09/08/2009	19:10	E82574
2040	Picloram	500	ug/L	0.23	U	EPA 515.3	0.23	0.1	09/03/2009	09/05/2009	15:05	E82574
2041	Dinoseb	7	ug/L	0.86	U	EPA 515.3	0.86	0.2	09/03/2009	09/05/2009	15:05	E82574
2042	Hexachlorocyclopentadiene	50	ug/L	0.014	U	EPA 508	0.014	0.1	09/05/2009	09/07/2009	18:16	E82574
2046	Carbofuran	40	ug/L	0.28	U	EPA 531.1	0.28	0.9	09/04/2009	09/04/2009	21:46	E82574
2050	Atrazine	3	ug/L	0.16	U	EPA 525.2	0.16	0.1	09/08/2009	09/08/2009	19:10	E82574
2051	Alachlor	2	ug/L	0.26	U	EPA 525.2	0.26	0.2	09/08/2009	09/08/2009	19:10	E82574
2065	Heptachlor	0.4	ug/L	0.0063	U	EPA 508	0.0063	0.04	09/05/2009	09/07/2009	18:16	E82574
2067	Heptachlor Epoxide	0.2	ug/L	0.0031	U	EPA 508	0.0031	0.02	09/05/2009	09/07/2009	18:16	E82574
2105	2,4-D	70	ug/L	1.5	U	EPA 515.3	1.5	0.1	09/03/2009	09/05/2009	15:05	E82574
2110	2,4,5-TP (Silvex)	50	ug/L	0.32	U	EPA 515.3	0.32	0.2	09/03/2009	09/05/2009	15:05	E82574
2274	Hexachlorobenzene	1	ug/L	0.0058	U	EPA 508	0.0058	0.1	09/05/2009	09/07/2009	18:16	E82574
2306	Benzo(a)pyrene	0.2	ug/L	0.096	U	EPA 525.2	0.096	0.02	09/08/2009	09/08/2009	19:10	E82574
2326	Pentachlorophenol	1	ug/L	0.069	U	EPA 515.3	0.069	0.04	09/03/2009	09/05/2009	15:05	E82574
2383	Polychlorinated biphenyls(PCB)	0.5	ug/L	0.11	U	EPA 508	0.11	0.1	09/05/2009	09/07/2009	18:16	E82574
2931	Dibromochloropropane	0.2	ug/L	0.0082	U	EPA 504.1	0.0082	0.02	09/03/2009	09/03/2009	21:00	E82574
2946	Ethylene Dibromide (EDB)	0.02	ug/L	0.0091	U	EPA 504.1	0.0091	0.01	09/03/2009	09/03/2009	21:00	E82574
2959	Chlordane	2	ug/L	0.048	U	EPA 508	0.048	0.2	09/05/2009	09/07/2009	18:16	E82574

NOTE: Effective January 1, 2004, results indicating non-detection with a reported lab MDL >50% of the MCL will not be accepted for compliance with 62-550.310(4)(b).

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

AQUA.

Aqua Utilities Florida
Secondary Water Quality Project Report
July 2010

Tangerine Water System

Tangerine is a community of about 278 Aqua Utilities Florida customers in Orange County.

In the past year, Aqua has worked to tackle the aesthetic qualities – the look, smell and taste – of the tap water in the Tangerine system. Although these aesthetic qualities are considered "secondary" water quality standards, and Aqua has not exceeded the secondary standards for iron and manganese, Aqua has moved forward with initiatives to address customer concerns.

Aqua will be installing 2,000 feet of new water main in July to connect dead ends and areas that now experience low water pressure, primarily along Huron Street, Scott Avenue, Section Street, Pine Street, and Orange Blossom Train. We also replaced 1,100 feet of old main along Orange Blossom Train and Pine Street.

Aqua also applied for a state permit to install a "sequestration" treatment system in Tangerine, and contractors installed the system in March awaiting DEP issuance of the clearance to operate the system. This system will bind the naturally occurring calcium and manganese in the system's well water, which should reduce the residue customers might see on their dishes and fixtures.

HBEL, Inc.
5600 U.S. 1 North, Fort Pierce, FL 34946
Phone: (772) 465-9584 Fax: (772) 467-1584

SECONDARY CONTAMINANTS
62 - 550.320

Client: Aqua Utilities Florida, Inc.
Workorder: Tangerine Triannual
Sample Location: Tangerine POE Grab
Sample Number: 2135265001
Sampling Date: 7/15/09 10:30
PWS ID (From Page 1): _____
Date Received: 7/15/09 12:36

Contam ID	Contam Name	MCL	Units	Analysis Result	Qual.*	Analytical Method	Lab MDL	Analysis Date/Time	DOH Lab Cert #
1002	Aluminum	[0.2]	mg/L	0.0036		EPA 200.7	0.0024	7/31/09 12:06	E96080
1017	Chloride	[250]	mg/L	18		EPA 300.0	5.0	7/21/09 11:19	E96080
1022	Copper	[1]	mg/L	0.00090		EPA 200.7	0.00070	7/31/09 12:06	E96080
1025	Fluoride	[2]	mg/L	0.11		EPA 300.0	0.011	7/16/097/16/09	E96080
1028	Iron	[0.3]	mg/L	0.017		EPA 200.7	0.0050	7/31/09 12:06	E96080
1032	Manganese	[0.05]	mg/L	0.00050 U		EPA 200.7	0.00050	7/31/09 12:06	E96080
1050	Silver	[0.1]	mg/L	0.00050 U		EPA 200.7	0.00050	7/31/09 12:06	E96080
1055	Sulfate	[250]	mg/L	7.3		EPA 300.0	1.4	7/21/09 11:19	E96080
1095	Zinc	[5]	mg/L	0.0020 U		EPA 200.7	0.0020	7/31/09 12:06	E96080
1905	Color	[15]	CU	4.0		SM2120 B	1.8	7/16/09 16:30	E96080
1925	pH	[6.5-8.5]	SU	8.16	Q	EPA 150.1	0.200	7/16/09 12:07	E96080
1930	Total Dissolved Solids	[500]	mg/L	180		SM2540 C	16	7/17/09 14:30	E96080
2905	Foaming Agents	[0.5]	mg/L	0.023		SM5540 C	0.022	7/17/09 9:54	E96080

Reporting Format 62-550.730
Effective January 1996, Revised January 2007

* Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results Qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

HBEL, Inc.
5600 U.S. 1 North, Fort Pierce, FL 34946
Phone: (772) 465-8584 Fax: (772) 467-1584

INORGANIC CONTAMINANTS
62 - 550.310 (1)

Client: Aqua Utilities Florida, Inc.
Workorder: Tangerine Triannual
Sample Location: Tangerine POE Grab
Sample Number: 2135265001
Sampling Date: 7/15/09 10:30
PWS ID (From Page 1): _____
Date Received: 7/15/09 12:36

Contam ID	Contam Name	MCL	Units	Analysis Result	Qual*	Analytical Method	Lab MDL	Analysis Date/Time	DOH Lab Cert #
1040	Nitrate as N	[10]	mg/L	0.0081		EPA 300.0	0.0030	7/16/09 13:24	E96080
1041	Nitrite as N	[1]	mg/L	0.0022 U		EPA 300.0	0.0022	7/16/09 13:24	E96080
1005	Arsenic	[0.01]	mg/L	0.0010 U		EPA 200.9	0.0010	7/23/09 10:00	E84129
1010	Barium	[2]	mg/L	0.020		EPA 200.7	0.00050	7/31/09 12:06	E96080
1015	Cadmium	[0.005]	mg/L	0.00030 U		EPA 200.7	0.00030	7/31/09 12:06	E96080
1020	Chromium	[0.1]	mg/L	0.00040 U		EPA 200.7	0.00040	7/31/09 12:06	E96080
1024	Cyanide	[0.2]	mg/L	0.0047 U		SM4500CN E	0.0047	7/24/09 10:10	E96080
1025	Fluoride	[4]	mg/L	0.11		EPA 300.0	0.011	7/16/09 13:24	E96080
1030	Lead	[0.015]	mg/L	0.00070 U		EPA 200.9	0.00070	7/31/09 15:45	E96080
1035	Mercury	[0.002]	mg/L	0.000060 U		EPA 245.1	0.000060	7/21/09 17:44	E96080
1036	Nickel	[0.1]	mg/L	0.00050 U		EPA 200.7	0.00050	7/31/09 12:06	E96080
1045	Selenium	[0.05]	mg/L	0.0022 U		EPA 200.9	0.0022	7/22/09 19:12	E96080
1052	Sodium	[160]	mg/L	13		EPA 200.7	0.50	7/31/09 12:06	E96080
1074	Antimony	[0.006]	mg/L	0.00082 U		EPA 200.9	0.00082	7/23/09 12:23	E96080
1075	Beryllium	[0.004]	mg/L	0.00050 U		EPA 200.7	0.00050	7/31/09 12:06	E96080
1085	Thallium	[0.002]	mg/L	0.0010 U		EPA 200.9	0.0010	7/23/09 15:33	E96080

sporting Format 62-550.730
fective January 1995, Revised January 2007

Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results Qualified with A, F, H, N, O, T, Z, ?, *, are acceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To void a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

HBEL, Inc.
5600 U.S. 1 North, Fort Pierce, FL 34946
Phone: (772) 465-6584 Fax: (772) 467-6584

SYNTHETIC ORGANICS 62 - 550.310 (4) (b)

Client: Aqua Utilities Florida, Inc.
Workorder: Tangerine Triannual
Sample Location: Tangerine POE Grab
Sample Number: 2135265001
Sampling Date: 7/15/09 10:30
PWS ID (From Page 1): _____
Date Received: 7/15/09 12:36

Contam ID	Contam Name	MCL	Units	Analysis Result	Qual*	Analytical Method	Lab MDL	RDL	Extraction Date	Analysis Date/Time	DOH Lab Cert #
2005	Endrin	[2]	ug/L	0.10 U		EPA 505	0.10	0.01	7/21/09	7/21/09 21:58	E96080
2010	gamma-BHC (Lindane)	[0.2]	ug/L	0.020 U		EPA 505	0.020	0.02	7/21/09	7/21/09 21:58	E96080
2015	Methoxychlor	[40]	ug/L	0.044 U		EPA 505	0.044	0.1	7/21/09	7/21/09 21:58	E96080
2020	Toxaphene	[3]	ug/L	0.61 U		EPA 505	0.61	1	7/21/09	7/21/09 21:58	E96080
2031	Dalapon	[200]	ug/L	2.3 U		EPA 515.1	2.3	1	7/27/09	7/28/09 18:04	E96080
2032	Diquat	[20]	ug/L	1.9 U		EPA 549.2	1.9	0.4	7/22/09	7/29/09 12:35	E96080
2033	Endothall	[100]	ug/L	2.8 U		EPA 548.1	2.8	9	7/22/09	7/24/09 23:02	E96080
2034	Glyphosate	[700]	ug/L	13 U		EPA 547	13	6		7/22/09 12:40	E96080
2035	Di(2-ethylhexyl)adipate	[400]	ug/L	0.68 U		EPA 525.2	0.68	0.6	7/23/09	7/29/09 15:37	E96080
2036	Oxamyl	[200]	ug/L	0.13 U		EPA 531.1	0.13	2		7/21/09 17:45	E96080
2037	Simazine	[4]	ug/L	0.63 U		EPA 525.2	0.63	0.07	7/23/09	7/29/09 15:37	E96080
2039	bis(2-ethylhexyl)phthalate	[6]	ug/L	0.85 U		EPA 525.2	0.85	0.6	7/23/09	7/29/09 15:37	E96080
2040	Picloram	[500]	ug/L	0.23 U		EPA 515.1	0.23	0.1	7/27/09	7/28/09 18:04	E96080
2041	Dinoseb	[7]	ug/L	0.23 U		EPA 515.1	0.23	0.2	7/27/09	7/28/09 18:04	E96080
2042	Hexachlorocyclopentadiene	[50]	ug/L	0.24 U		EPA 525.2	0.24	0.1	7/23/09	7/29/09 15:37	E96080
2046	Carbofuran	[40]	ug/L	0.41 U		EPA 531.1	0.41	0.9		7/21/09 17:45	E96080
2050	Atrazine	[3]	ug/L	0.48 U		EPA 525.2	0.48	0.1	7/23/09	7/29/09 15:37	E96080
2051	Alachlor	[2]	ug/L	0.61 U		EPA 525.2	0.61	0.2	7/23/09	7/29/09 15:37	E96080
2065	Heptachlor	[0.4]	ug/L	0.036 U		EPA 505	0.036	0.04	7/21/09	7/21/09 21:58	E96080
2067	Heptachlor epoxide	[.2]	ug/L	0.028 U		EPA 505	0.028	0.02	7/21/09	7/21/09 21:58	E96080
2105	2,4-D	[70]	ug/L	0.22 U		EPA 515.1	0.22	0.1	7/27/09	7/28/09 18:04	E96080
2110	2,4,5-TP	[50]	ug/L	0.19 U		EPA 515.1	0.19	0.2	7/27/09	7/28/09 18:04	E96080
2274	Hexachlorobenzene	[1]	ug/L	0.31 U		EPA 525.2	0.31	0.1	7/23/09	7/29/09 15:37	E96080
2306	Benzo(a)pyrene	[.2]	ug/L	0.070 U		EPA 525.2	0.070	0.02	7/23/09	7/29/09 15:37	E96080
2326	Pentachlorophenol	[1]	ug/L	0.39 U		EPA 515.1	0.39	0.04	7/27/09	7/28/09 18:04	E96080
2383	PCB	[.5]	ug/L	0.14 U		EPA 505	0.14	0.1	7/21/09	7/21/09 21:58	E96080
2931	1,2-Dibromo-3-chloropropane	[.2]	ug/L	0.0036 U		EPA 504.1	0.0036	0.02	7/27/09	7/27/09 22:30	E96080
2946	1,2-Dibromoethane	[.02]	ug/L	0.0047 U		EPA 504.1	0.0047	0.01	7/27/09	7/27/09 22:30	E96080
2959	Chlordane	[2]	ug/L	0.13 U		EPA 505	0.13	0.2	7/21/09	7/21/09 21:58	E96080

sporting Format 62-550.730
fective January 1996, Revised January 2007

NOTE: Results indicating non-detection with a reported lab MDL >50% of the MCL will not be accepted for compliance with 62-550.310(4)(b).

Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results Qualified with A, F, H, N, O, T, Z, ?, *, are acceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To void a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

HBEL, Inc.
5600 U.S. 1 North, Fort Pierce, FL 34946
Phone: (772) 465-9584 Fax: (772) 467-1584

VOLATILE ORGANICS
62 - 550.310 (4) (a)

Client: Aqua Utilities Florida, Inc.
Workorder: Tangerine Triannual
Sample Location: Tangerine POE Grab
Sample Number: 2135265001
Sampling Date: 7/15/09 10:30
PWS ID (From Page 1): _____
Date Received: 7/15/09 12:36

Contam ID	Contam Name	MCL	Units	Analysis Result	Qual*	Analytical Method	Lab MDL	RDL	Analysis Date/Time	DOH Lab Cert #
2378	1,2,4-Trichlorobenzene	[70]	ug/L	0.12 U		EPA 524.2	0.12	0.5	7/28/09 1:39	E96080
2380	cis-1,2-Dichloroethene	[70]	ug/L	0.25 U		EPA 524.2	0.25	0.5	7/28/09 1:39	E96080
2955	Total Xylenes	[10000]	ug/L	0.41 U		EPA 524.2	0.41	0.5	7/28/09 1:39	E96080
2964	Dichloromethane	[5]	ug/L	0.43 U		EPA 524.2	0.43	0.5	7/28/09 1:39	E96080
2968	1,2-Dichlorobenzene	[600]	ug/L	0.15 U		EPA 524.2	0.15	0.5	7/28/09 1:39	E96080
2969	1,4-Dichlorobenzene	[75]	ug/L	0.18 U		EPA 524.2	0.18	0.5	7/28/09 1:39	E96080
2976	Vinyl chloride	[1]	ug/L	0.25 U		EPA 524.2	0.25	0.5	7/28/09 1:39	E96080
2977	1,1-Dichloroethene	[7]	ug/L	0.35 U		EPA 524.2	0.35	0.5	7/28/09 1:39	E96080
2979	trans-1,2-Dichloroethene	[100]	ug/L	0.30 U		EPA 524.2	0.30	0.5	7/28/09 1:39	E96080
2980	1,2-Dichloroethene	[3]	ug/L	0.21 U		EPA 524.2	0.21	0.5	7/28/09 1:39	E96080
2981	1,1,1-Trichloroethane	[200]	ug/L	0.31 U		EPA 524.2	0.31	0.5	7/28/09 1:39	E96080
2982	Carbon tetrachloride	[3]	ug/L	0.36 U		EPA 524.2	0.36	0.5	7/28/09 1:39	E96080
2983	1,2-Dichloropropane	[5]	ug/L	0.24 U		EPA 524.2	0.24	0.5	7/28/09 1:39	E96080
2984	Trichloroethene	[3]	ug/L	0.17 U		EPA 524.2	0.17	0.5	7/28/09 1:39	E96080
2985	1,1,2-Trichloroethane	[5]	ug/L	0.22 U		EPA 524.2	0.22	0.5	7/28/09 1:39	E96080
2987	Tetrachloroethene	[3]	ug/L	0.26 U		EPA 524.2	0.26	0.5	7/28/09 1:39	E96080
2989	Chlorobenzene	[100]	ug/L	0.17 U		EPA 524.2	0.17	0.5	7/28/09 1:39	E96080
2990	Benzene	[1]	ug/L	0.15 U		EPA 524.2	0.15	0.5	7/28/09 1:39	E96080
2991	Toluene	[1000]	ug/L	0.26 U		EPA 524.2	0.26	0.5	7/28/09 1:39	E96080
2992	Ethylbenzene	[700]	ug/L	0.17 U		EPA 524.2	0.17	0.5	7/28/09 1:39	E96080
2996	Styrene	[70]	ug/L	0.17 U		EPA 524.2	0.17	0.5	7/28/09 1:39	E96080

Reporting Format 62-550.730
Effective January 1995, Revised January 2007

* Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results Qualified with A, F, H, N, O, T, Z, ?, *, unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

SOUTHERN ANALYTICAL LABORATORIES, INC.
110 BAYVIEW BOULEVARD, OLDSMAR, FL 34677 813-855-1844 fax 813-855-6218

Harbor Branch Environmental Laboratory
2135265
Sample ID: 2135265 001EF

August 3, 2009
Sample No.: 93623.01
PWS ID: _____

Radionuclides
62-550.310(6)

Contaminant ID	Contaminant Name	MCL	Units	Analysis Result	Qualifier	Analytical Method	Lab MDL	RDL **	Analysis Error	Analysis Date	Analysis Time	DOH Lab Certification #
4002	Gross Alpha (Incl. Uranium)	***	pCi/L	2.0	U1	EPA 900.0	2.0	3	1.7	07/28/09	08:19	E84129
4006	Combined Uranium	30	ug/L	0.2	U,S32	EPA 200.8	0.2	—	—	07/22/09		E87604
4006	Combined Uranium	20	pCi/L	0.1	U,S32	EPA 200.8	0.1	—	—	07/22/09		E87604
4020	Radium-226	5*	pCi/L	0.6		EPA 903.1	0.03	1	0.2	07/28/09	14:51	E84129
4030	Radium-226	5*	pCi/L	0.3	U1	EPA RA-05	0.3	1	0.2	07/30/09	16:22	E84129

* Combined Limit
*** If the results exceed 5 pCi/L, a measurement for radium-226 is required.
If the results exceed 15 pCi/L, measurements for radium-226 and uranium are required.

* Qualifiers:

U,S32 Analyte was analyzed. Indicated concentration is MDL. Analysis subcontracted to Katahdin Analytical Services, FDOH Cert. No. E87604. Uranium analysis run by EPA 200.8.
U1 Analyte was not detected; indicated concentration is method detection limit. Radiochemistry MDL is sample specific and matrix dependent.

AQUA.

Aqua Utilities Florida
Secondary Water Quality Project Report
July 2010

Tomoka View Water System

Aqua's primary focus in Tomoka View has been to develop options to resolve the total trihalomethane (TTHM) problem in the water system. Aqua received a permit from the Volusia County Health Department of Health in December 2009 to install new chloramination treatment equipment, and we Tangerine is a community of about 263 Aqua Utilities Florida customers in Volusia County.

Aqua's installed and launched the system later that month to reduce elevated TTHM's. Chloramination – the use of chloramines – has been used as a disinfectant in water distribution systems for many years in many communities throughout the U.S, and Canada. This new treatment system is working: TTHM levels have dropped, and the water now meets federal standards. We will continue to closely monitor the situation.

In the past year, Aqua also has worked to tackle the aesthetic qualities – the look, smell and taste of tap water in Tomoka View. Although these aesthetic qualities are considered "secondary" water quality standards, and Aqua has not exceeded these secondary standards, we have moved forward with initiatives to address customer concerns.

In July 2009, Aqua determined that a new flushing program would help improve the appearance of Tomoka View's water. The water can contain natural minerals that can accumulate in distribution system pipes, and sudden changes in flow in distribution system can disturb deposits in the mains and cause discolored water. Aqua installed eight new isolation valves, and blow-off assemblies in strategic areas so that we can target more aggressive flushing where it's needed most. Aqua also devised a systematic schedule that involves operating valves in a specific sequence to maximize the effectiveness of the flushing. The plan cleaned up accumulated natural deposits in the mains and should reduce discolored water in the future. Field operations employees take regular samples from the distribution system and, if the water quality begins to degrade, they will adjust the automatic flushing devices to operate more often and for a longer duration.

The water in Tomoka View also contains naturally occurring copper, which Aqua determined could be removed by a "sequestration" treatment system. Aqua contracted with AquaMag, which installed the system in December 2009. AquaMag samples water from the distribution system monthly to monitor the effects of the sequestering program.

Aqua management has met with Tomoka View customers regularly to discuss customer concerns and create strategies to improve the look, taste and smell of their water. We will continue to talk with our customers and keep them informed as our plans progress.

Tomoka View

ITEMS:	Dollars/numbers	Comments
	185	connections
capacity fees:	$ 2,063.00	per home
Total Fees:	$ 381,655.00	Total capacity fees
2 X 8" meters:	$ 17,000.00	(based on Ormond's cost
Labor:	$ 1,000.00	($100/hr X 8 hrs plus misc materials)
Tie in:	$ 150,000.00	Guestimate
Misc 15%of total	$ 25,200.00	Does not include capacity fees (guess)
Total Project:	**$ 574,855.00**	
Current Rate Base:	$75,000.00	estimate based on current rate base
Abandonment:	$20,000.00	of capital assoc. with the plant cost given we reduce rate base
Sub-Total:	**$ 669,855.00**	
Sale of Land:	$ (20,000.00)	
Grand Total:	**$ 649,855.00**	**which equals $4,119.29 per connection**

Purchase Water: $ 48,000.00 Annually
$ 4,000.00 Monthly

Above based on $2.50/1000 gallons
(From the City of Ormond Beach)

O&M - there is really no difference given Twin Rivers/Tomoka are together and one will take on all costs of travel and assoc. expense that would be made up by a reduction in operator costs.

DISINFECTION BYPRODUCTS
62-550.310(3)

Report Number/ Job ID: 355866002 - Tomoka View
Disinfectant Residual (mg/L) (From Page 1):
PWS ID (from Page 1):

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification #
2450	Monochloroacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	01/14/2010	22:15	E83079
2451	Dichloroacetic Acid	N/A	ug/L	6.0		EPA 552.2	0.61	01/14/2010	22:15	E83079
2452	Trichloroacetic Acid	N/A	ug/L	2.1		EPA 552.2	0.61	01/14/2010	22:15	E83079
2453	Monobromoacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	01/14/2010	22:15	E83079
2454	Dibromoacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	01/14/2010	22:15	E83079
2456	Total Haloacetic Acids (HAA5)	60	ug/L	8.1		EPA 552.2	0.61	01/14/2010	22:15	E83079
2941	Chloroform	N/A	ug/L	5.1		EPA 524.2	0.25	01/15/2010	09:20	E83079
2942	Bromoform	N/A	ug/L	0.25	U	EPA 524.2	0.25	01/15/2010	09:20	E83079
2943	Bromodichloromethane	N/A	ug/L	1.5		EPA 524.2	0.25	01/15/2010	09:20	E83079
2944	Dibromochloromethane	N/A	ug/L	0.33	I	EPA 524.2	0.25	01/15/2010	09:20	E83079
[illegible]	[illegible]	80	ug/L	8.9		EPA 524.2	0.25	[illegible]	09:20	E83079

NOTE: Do not round values. Report results to the accuracy, precision, and sensitivity of the analytical

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

DISINFECTION BYPRODUCTS
62-550.310(3)

Report Number/ Job ID: 357223002
Disinfectant Residual (mg/L) (From Page 1):
PWS ID (from Page 1):

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification #
2450	Monochloroacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	02/17/2010	01:47	E83079
2451	Dichloroacetic Acid	N/A	ug/L	4.9		EPA 552.2	0.61	02/17/2010	01:47	E83079
2452	Trichloroacetic Acid	N/A	ug/L	1.8		EPA 552.2	0.61	02/17/2010	01:47	E83079
2453	Monobromoacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	02/17/2010	01:47	E83079
2454	Dibromoacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	02/17/2010	01:47	E83079
2456	Total Haloacetic Acids (HAA5)	60	ug/L	6.6		EPA 552.2	0.61	02/17/2010	01:47	E83079

2941	Chloroform	N/A	ug/L	6.1		EPA 524.2	0.25	02/18/2010	01:16	E83079
2942	Bromoform	N/A	ug/L	0.25	U	EPA 524.2	0.25	02/18/2010	01:16	E83079
2943	Bromodichloromethane	N/A	ug/L	1.3		EPA 524.2	0.25	02/18/2010	01:16	E83079
2944	Dibromochloromethane	N/A	ug/L	0.31	I	EPA 524.2	0.25	02/18/2010	01:16	E83079
2950	[redacted]	80	ug/L	7.7		EPA 524.2	0.25	02/18/2010	01:16	E83079

NOTE: Do not round values. Report results to the accuracy, precision, and sensitivity of the analytical

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160 Table I. Results qualified with A, F, H, N, C, T, Z, ? are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

DISINFECTION BYPRODUCTS
62-550.310(3)

Report Number/ Job ID: 358452001
Disinfectant Residual (mg/L) (From Page 1):
PWS ID (from Page 1):

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certificadon #
2941	Chloroform	N/A	ug/L	5.2		EPA 524.2	0.25	03/12/2010	02:30	E83079
2942	Bromoform	N/A	ug/L	0.25	U	EPA 524.2	0.25	03/12/2010	02:30	E83079
2943	Bromodichloromethane	N/A	ug/L	1.5		EPA 524.2	0.25	03/12/2010	02:30	E83079
2944	Dibromochloromethane	N/A	ug/L	0.25	U	EPA 524.2	0.25	03/12/2010	02:30	E83079
2950	Total Trihalomethanes	[illegible]	ug/L	[illegible]		EPA 524.2	0.25	[illegible]	02:30	E83079

NOTE: Do not round values. Report results to the accuracy, precision, and sensitivity of the analytical

DISINFECTION BYPRODUCTS
62-550.310(3)

Report Number/ Job ID: 359661001
Disinfectant Residual (mg/L) (From Page 1):
PWS ID (from Page 1):

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification #
2450	Monochloroacetic Acid	N/A	ug/L	1.9		EPA 552.2	0.61	04/09/2010	15:34	E83079
2451	Dichloroacetic Acid	N/A	ug/L	5.8		EPA 552.2	0.61	04/09/2010	15:34	E83079
2452	Trichloroacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	04/09/2010	15:34	E83079
2453	Monobromoacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	04/09/2010	15:34	E83079
2454	Dibromoacetic Acid	N/A	ug/L	0.61	U	EPA 552.2	0.61	04/09/2010	15:34	E83079
2456	Total Haloacetic Acids (HAA5)	60	ug/L	7.8		EPA 552.2	0.61	04/09/2010	15:34	E83079

2941	Chloroform	N/A	ug/L	6.2		EPA 524.2	0.25	04/19/2010	06:19	E83079
2942	Bromoform	N/A	ug/L	0.25	U	EPA 524.2	0.25	04/19/2010	06:19	E83079
2943	Bromodichloromethane	N/A	ug/L	0.87		EPA 524.2	0.25	04/19/2010	06:19	E83079
2944	Dibromochloromethane	N/A	ug/L	0.25	U	EPA 524.2	0.25	04/19/2010	06:19	E83079
2950	Total Trihalomethanes	80	ug/L	6.1		EPA 524.2	0.25	04/19/2010	06:19	E83079

NOTE: Do not round values. Report results to the accuracy, precision, and sensitivity of the analytical

Pace Analytical Services, Inc.
9 East Tower Circle
Ormond Beach, FL 32174
(386)672-5668

ANALYTICAL RESULTS

Project: 3641373/Tomoka View
Pace Project No.: 3511299

Sample: 160 Green Briar Ln **Lab ID: 3511299003** **Collected: 05/10/10 13:20** **Received: 05/10/10 14:00** **Matrix: Drinking Water**

Parameters	Results	Units	PQL	MDL	DF	Prepared	Analyzed	CAS No.	Qual
552.2 Haloacetic Acids	Analytical Method: EPA 552.2 Preparation Method: EPA 552.2								
Monochloroacetic Acid	1.6	ug/L	1.0	0.61	1	05/20/10 15:30	05/22/10 03:43	79-11-8	
Monobromoacetic Acid	0.61U	ug/L	1.0	0.61	1	05/20/10 15:30	05/22/10 03:43	79-08-3	
Dichloroacetic Acid	13.7	ug/L	1.0	0.61	1	05/20/10 15:30	05/22/10 03:43	79-43-6	1p,F5
Trichloroacetic Acid	6.0	ug/L	1.0	0.61	1	05/20/10 15:30	05/22/10 03:43	76-03-9	
Dibromoacetic Acid	2.9	ug/L	1.0	0.61	1	05/20/10 15:30	05/22/10 03:43	631-64-1	
Haloacetic Acids (Total)	24.1	ug/L	1.0	0.61	1	05/20/10 15:30	05/22/10 03:43		
2,3-Dibromopropanoic Acid (S)	101	%	70-130		1	05/20/10 15:30	05/22/10 03:43	600-05-5	
524.2 THM	Analytical Method: EPA 524.2								
Bromodichloromethane	13.9	ug/L	0.50	0.25	1		05/13/10 09:38	75-27-4	
Bromoform	2.9	ug/L	0.50	0.25	1		05/13/10 09:38	75-25-2	
Chloroform	19.4	ug/L	0.50	0.25	1		05/13/10 09:38	67-66-3	
Dibromochloromethane	6.1	ug/L	0.50	0.25	1		05/13/10 09:38	124-48-1	
Total Trihalomethanes (Calc.)	[redacted]		0.50	0.25	1		[redacted]		
4-Bromofluorobenzene (S)	92	%	70-130		1		05/13/10 09:38	460-00-4	
Dibromofluoromethane (S)	100	%	70-130		1		05/13/10 09:38	1868-53-7	
Toluene-d8 (S)	99	%	70-130		1		05/13/10 09:38	2037-26-5	
1,2-Dichloroethane-d4 (S)	101	%	70-130		1		05/13/10 09:38	17060-07-0	

Pace Analytical Services, Inc.
8 East Tower Circle
Ormond Beach, FL 32174
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ANALYTICAL RESULTS

Project: 3641373/Tomoka View TTHM
Pace Project No.: 3512742

Sample: 160 Greenbriar Ln Lab ID: 3512742001 Collected: 06/08/10 15:00 Received: 06/08/10 15:20 Matrix: Drinking Water

Parameters	Results	Units	PQL	MDL	DF	Prepared	Analyzed	CAS No.	Qual
552.2 Haloacetic Acids	Analytical Method: EPA 552.2 Preparation Method: EPA 552.2								
Dibromoacetic Acid	2.2	ug/L	1.0	0.61	1	06/14/10 16:30	06/17/10 01:45	631-64-1	
Dichloroacetic Acid	8.6	ug/L	1.0	0.61	1	06/14/10 16:30	06/17/10 01:45	79-43-6	
Haloacetic Acids (Total)	21.5	ug/L	1.0	0.61	1	06/14/10 16:30	06/17/10 01:45		
Monobromoacetic Acid	0.61U	ug/L	1.0	0.61	1	06/14/10 16:30	06/17/10 01:45	79-08-3	
Monochloroacetic Acid	4.8	ug/L	1.0	0.61	1	06/14/10 16:30	06/17/10 01:45	79-11-8	F5
Trichloroacetic Acid	5.9	ug/L	1.0	0.61	1	06/14/10 16:30	06/17/10 01:45	76-03-9	
2,3-Dibromopropanoic Acid (S)	109	%	70-130		1	06/14/10 16:30	06/17/10 01:45	600-05-5	2p
524.2 THM	Analytical Method: EPA 524.2								
Bromodichloromethane	12.6	ug/L	0.50	0.25	1		06/15/10 20:38	75-27-4	
Bromoform	1.4	ug/L	0.50	0.25	1		06/15/10 20:38	75-25-2	
Chloroform	16.8	ug/L	0.50	0.25	1		06/15/10 20:38	67-66-3	
Dibromochloromethane	9.6	ug/L	0.50	0.25	1		06/15/10 20:38	124-48-1	
[redacted]	[redacted]		0.50	0.25	1		[redacted]		
4-Bromofluorobenzene (S)	100	%	70-130		1		06/15/10 20:38	460-00-4	
Dibromofluoromethane (S)	96	%	70-130		1		06/15/10 20:38	1868-53-7	
Toluene-d8 (S)	124	%	70-130		1		06/15/10 20:38	2037-26-5	
1,2-Dichloroethane-d4 (S)	101	%	70-130		1		06/15/10 20:38	17060-07-0	

HBEL, Inc.
5600 U.S. 1 North, Fort Pierce, FL 34946
Phone: (772) 465-8584 Fax: (772) 467-1584

Date issued: March 31, 2009

To: Will Fontaine
Aqua Utilities Florida, Inc.
930 S South State Road 19
Palatka, FL 321779394

Client: Aqua Utilities Florida, Inc.
Workorder ID: Tomoka View Triannual Pri/Sec **[2134204]**
Received: 3/11/09 12:22

Dear Will Fontaine;

Analytical results presented in this report have been reviewed for compliance with the HBEL, Inc. Quality Systems Manual and have been determined to meet applicable Method guidelines and Standards referenced in the July 2003 National Environmental Laboratory Accreditation Program (NELAP) Quality Manual unless otherwise noted. The Analytical Results within these report pages reflect the values obtained from tests performed on Samples As Received by the laboratory unless indicated differently.

FDOH Safe Drinking Water Act, Clean Water Act and RCRA Certification #'s:

E96080, E83509

Questions regarding this report should be directed to the Report Signatory at (772) 465-8584 referencing the HBEL Workorder ID [Number].

Respectfully submitted,

Eric Charest
HBEL, Inc. Laboratory Manager

HBEL, Inc.
5600 U.S. 1 North, Fort Pierce, FL 34946
Phone: (772) 465-8584 Fax: (772) 467-1584

CERTIFICATE OF ANALYSIS

[2134204]

Client: Aqua Utilities Florida, Inc. *Workorder ID:* Tomoka View Triannual Pri/Sec

Laboratory ID: **2134204001** *Sampled:* **03/10/09 13:45** *Received:* **03/11/09 12:22**
Sample ID: **P.O.E. Grab** *Matrix:* **Water**
Results reported on Wet Weight Basis

Parameter	Qualifier	Result [1]	Units	Reporting Limit	Method	Laboratory Batch	Prep Date/Time	Analyzed Date/Time	Analyst	Lab ID
Odor - Dechlorinated		1.0 U	T.O.N.	1.0	EPA 140.1	WCDE18749		03/11/09 13:41	PA	E83509
pH	Q	7.86	SU	0.200	EPA 150.1	WCGE30741		03/12/09 18:38	GS	E96080
Aluminum		0.0030 U	mg/L	0.0030	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Barium		0.017	mg/L	0.0018	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Beryllium		0.00010 U	mg/L	0.00010	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Cadmium		0.00070 U	mg/L	0.00070	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Chromium		0.0018 U	mg/L	0.0018	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Copper		0.0034	mg/L	0.0014	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Iron		0.025 U	mg/L	0.025	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Manganese		0.026	mg/L	0.0037	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Nickel		0.0020 U	mg/L	0.0020	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Silver		0.0010 U	mg/L	0.0010	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Sodium		63	mg/L	0.50	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Zinc		0.010 U	mg/L	0.010	EPA 200.7	META9279		03/17/09 20:22	DM	E96080
Antimony		0.0011	mg/L	0.00062	EPA 200.9	META9283		03/18/09 21:22	DM	E96080
Arsenic		0.0010 U	mg/L	0.0010	EPA 200.9	META9281		03/18/09 16:19	DM	E96080
ead		0.00061 U	mg/L	0.00061	EPA 200.9	META9273		03/13/09 11:53	DM	E96080
Selenium		0.0022 U	mg/L	0.0022	EPA 200.9	META9294		03/26/09 17:25	DM	E96080
Thallium		0.0010 U	mg/L	0.0010	EPA 200.9	META9298		03/27/09 11:48	DM	E96080
Mercury		0.00015	mg/L	0.000060	EPA 245.1	META9275	03/13/09 13:10	03/16/09 18:30	DM	E96080
Chloride		110	mg/L	5.0	EPA 300.0	IC7989		03/16/09 13:06	SP	E96080
Fluoride		0.12	mg/L	0.011	EPA 300.0	IC7987		03/12/09 12:12	JL	E96080
Nitrate as N		0.011	mg/L	0.0030	EPA 300.0	IC7987		03/12/09 12:12	JL	E96080
Nitrite as N		0.0022 U	mg/L	0.0022	EPA 300.0	IC7987		03/12/09 12:12	JL	E96080
Sulfate		4.7	mg/L	1.4	EPA 300.0	IC7989		03/16/09 13:06	SP	E96080
1,2-Dibromo-3-chloropropane		0.0036 U	ug/L	0.0036	EPA 504.1	PEST5303	03/18/09 12:00	03/19/09 1:06	JL	E96080
1,2-Dibromoethane		0.0047 U	ug/L	0.0047	EPA 504.1	PEST5303	03/18/09 12:00	03/19/09 1:06	JL	E96080
Chlordane		0.13 U	ug/L	0.13	EPA 505	PEST5302	03/17/09 12:00	03/18/09 0:41	JL	E96080
Endrin		0.10 U	ug/L	0.10	EPA 505	PEST5302	03/17/09 12:00	03/18/09 0:41	JL	E96080
gamma-BHC (Lindane)		0.020 U	ug/L	0.020	EPA 505	PEST5302	03/17/09 12:00	03/18/09 0:41	JL	E96080
Heptachlor		0.036 U	ug/L	0.036	EPA 505	PEST5302	03/17/09 12:00	03/18/09 0:41	JL	E96080
Heptachlor epoxide		0.027 U	ug/L	0.027	EPA 505	PEST5302	03/17/09 12:00	03/18/09 0:41	JL	E96080
Methoxychlor		0.044 U	ug/L	0.044	EPA 505	PEST5302	03/17/09 12:00	03/18/09 0:41	JL	E96080
PCB		0.14 U	ug/L	0.14	EPA 505	PEST5302	03/17/09 12:00	03/18/09 0:41	JL	E96080
Toxaphene		0.60 U	ug/L	0.60	EPA 505	PEST5302	03/17/09 12:00	03/18/09 0:41	JL	E96080
2,4,5-TP		0.19 U	ug/L	0.19	EPA 515.1	PEST5300	03/15/09 8:00	03/17/09 0:53	JL	E96080
2,4-D		0.22 U	ug/L	0.22	EPA 515.1	PEST5300	03/15/09 8:00	03/17/09 0:53	JL	E96080
Dalapon		2.3 U	ug/L	2.3	EPA 515.1	PEST5300	03/15/09 8:00	03/17/09 0:53	JL	E96080
Dinoseb		0.23 U	ug/L	0.23	EPA 515.1	PEST5300	03/15/09 8:00	03/17/09 0:53	JL	E96080
Pentachlorophenol		0.39 U	ug/L	0.39	EPA 515.1	PEST5300	03/15/09 8:00	03/17/09 0:53	JL	E96080

HBEL, Inc.
5600 U.S. 1 North, Fort Pierce, FL 34946
Phone: (772) 465-8584 Fax: (772) 467-584

CERTIFICATE OF ANALYSIS

[2134204]

Client: Aqua Utilities Florida, Inc. *Workorder ID:* Tomoka View Triannual Pri/Sec

Parameter	Qualifier	Result [1]	Units	Reporting Limit	Method	Laboratory Batch	Prep Date/Time	Analyzed Date/Time	Analyst	Lab ID
Picloram		0.23 U	ug/L	0.23	EPA 515.1	PEST5300	03/15/09 8:00	03/17/09 0:53	JL	E96080
1,1,1-Trichloroethane		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
1,1,2-Trichloroethane		0.44 U	ug/L	0.44	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
1,1-Dichloroethene		0.23 U	ug/L	0.23	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
1,2,4-Trichlorobenzene		0.41 U	ug/L	0.41	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
1,2-Dichlorobenzene		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
1,2-Dichloroethane		0.29 U	ug/L	0.29	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
1,2-Dichloropropane		0.40 U	ug/L	0.40	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
1,4-Dichlorobenzene		0.23 U	ug/L	0.23	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Benzene		0.20 U	ug/L	0.20	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Carbon tetrachloride		0.24 U	ug/L	0.24	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Chlorobenzene		0.30 U	ug/L	0.30	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
cis-1,2-Dichloroethene		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Ethylbenzene		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Methylene chloride		0.23 U	ug/L	0.23	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Styrene		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Tetrachloroethene		0.24 U	ug/L	0.24	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Toluene		0.22 U	ug/L	0.22	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Total Xylenes		0.46 U	ug/L	0.46	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
trans-1,2-Dichloroethene		0.35 U	ug/L	0.35	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Trichloroethene		0.36 U	ug/L	0.36	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Vinyl chloride		0.32 U	ug/L	0.32	EPA 524.2	VOC3057		03/14/09 2:04	WR	E96080
Alachlor		0.61 U	ug/L	0.61	EPA 525.2	SVOC2746	03/14/09 8:00	03/17/09 16:29	CG	E96080
Atrazine		0.48 U	ug/L	0.48	EPA 525.2	SVOC2746	03/14/09 8:00	03/17/09 16:29	CG	E96080
Benzo(a)pyrene		0.070 U	ug/L	0.070	EPA 525.2	SVOC2746	03/14/09 8:00	03/17/09 16:29	CG	E96080
bis(2-ethylhexyl)phthalate		0.85 U	ug/L	0.85	EPA 525.2	SVOC2746	03/14/09 8:00	03/17/09 16:29	CG	E96080
Di(2-ethylhexyl)adipate		0.68 U	ug/L	0.68	EPA 525.2	SVOC2746	03/14/09 8:00	03/17/09 16:29	CG	E96080
Hexachlorobenzene		0.31 U	ug/L	0.31	EPA 525.2	SVOC2746	03/14/09 8:00	03/17/09 16:29	CG	E96080
Hexachlorocyclopentadiene		0.24 U	ug/L	0.24	EPA 525.2	SVOC2746	03/14/09 8:00	03/17/09 16:29	CG	E96080
Simazine		0.63 U	ug/L	0.63	EPA 525.2	SVOC2746	03/14/09 8:00	03/17/09 16:29	CG	E96080
Carbofuran		0.41 U	ug/L	0.41	EPA 531.1	HPLC2570		03/12/09 19:20	JJM	E96080
Oxamyl		0.13 U	ug/L	0.13	EPA 531.1	HPLC2570		03/12/09 19:20	JJM	E96080
Glyphosate		13 U	ug/L	13	EPA 547	HPLC2571		03/16/09 13:22	JJM	E96080
Endothall		2.8 U	ug/L	2.8	EPA 548.1	SVOC2745	03/14/09 8:00	03/15/09 22:29	CG	E96080
Diquat		1.9 U	ug/L	1.9	EPA 549.2	HPLC2573	03/17/09 13:00	03/24/09 14:29	JJM	E96080
Gross Alpha		2.0 U +/- 1.4	pCi/L		EPA 900.0	SAL1111		03/27/09 16:55	SAL	E84129
Radium 226		0.9 +/- 0.2	pCi/L		EPA 903.1	SAL1111		03/23/09 12:00	SAL	E84129
Radium 228		0.3 U +/- 0.2	pCi/L		EPA Alter.	SAL1111		03/26/09 12:01	SAL	E84129
Color		20	CU	1.8	SM2120 B	WCGE30739		03/12/09 13:15	SP	E96080
Total Dissolved Solids		550	mg/L	16	SM2540 C	WCGE30733		03/12/09 12:25	SP	E96080
Cyanide		0.063	mg/L	0.0047	SM4500CN E	WCGE30755	03/16/09 11:00	03/17/09 10:46	GG	E96080
Surfactants as LAS, Mol.wt.340		0.035	mg/L	0.022	SM5540 C	WCGE30747	03/12/09 13:15	03/13/09 14:17	GG	E96080

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FDOH # E96080

4155 St. Johns Pkwy Suite 1300
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FDOH # E83509

Printed: 3/31/09

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CERTIFICATE OF ANALYSIS

[2134204]

Client: Aqua Utilities Florida, Inc. *Workorder ID:* Tomoka View Triannual Pri/Sec

Parameter	Qualifier	Result[1]	Units	Reporting Limit	Method	Laboratory Batch	Prep Date/Time	Analyzed Date/Time	Analyst	Lab ID
Laboratory ID: **2134204002**					*Sampled:*		*Received:* 03/11/09 12:22			
Sample ID: **VOC TRIP BLANK**					*Matrix:* Water		Results reported on Wet Weight Basis			
1,1,1-Trichloroethane		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
1,1,2-Trichloroethane		0.44 U	ug/L	0.44	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
1,1-Dichloroethene		0.23 U	ug/L	0.23	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
1,2,4-Trichlorobenzene		0.41 U	ug/L	0.41	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
1,2-Dichlorobenzene		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
1,2-Dichloroethane		0.29 U	ug/L	0.29	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
1,2-Dichloropropane		0.40 U	ug/L	0.40	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
1,4-Dichlorobenzene		0.23 U	ug/L	0.23	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Benzene		0.20 U	ug/L	0.20	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Carbon tetrachloride		0.24 U	ug/L	0.24	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Chlorobenzene		0.30 U	ug/L	0.30	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
cis-1,2-Dichloroethene		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Ethylbenzene		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Methylene chloride		0.23 U	ug/L	0.23	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Styrene		0.21 U	ug/L	0.21	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Tetrachloroethene		0.24 U	ug/L	0.24	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
oluene		0.22 U	ug/L	0.22	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Total Xylenes		0.46 U	ug/L	0.46	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
trans-1,2-Dichloroethene		0.35 U	ug/L	0.35	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Trichloroethene		0.36 U	ug/L	0.36	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080
Vinyl chloride		0.32 U	ug/L	0.32	EPA 524.2	VOC3057		03/14/09 2:38	WR	E96080

[1]Result Qualifiers: U = Not Detected I = Analyte detected between the Laboratory Method Detection Limit and Laboratory Reporting Limit
Applicable Florida Department of Environmental Protection Qualifiers defined below. Statement of Estimated Uncertainty available upon request.

Q Sample held beyond the accepted holding time.

AQUA.

Aqua Utilities Florida
Secondary Water Quality Project Report
July 2010

Zephyr Shores Water System

Zephyr Shores is a community of about 500 Aqua Utilities Florida customers in Pasco County.

Aqua has worked diligently over the past several years to improve the operation and reliability of the Zephyr Shores system. As the Florida Public Service Commission noted in Aqua's last rate case decision, Aqua installed a second well and a generator to the system and entered a consent order with the Florida Department of Environmental Protection (FDEP) to address reliability and permitting issues. That consent order was closed on October 29, 2007. A consent order was issued in April 2009 for the late submittal of Quarterly Arsenic Samples, and that order was satisfied on August 24, 2009.

In the past year, Aqua has worked to tackle the aesthetic qualities — the look, smell and taste — of tap water in the system. Although these aesthetic qualities are considered "secondary" water quality standards, and Aqua has not exceeded the secondary standards for iron and manganese, Aqua has moved forward with initiatives to address customer concerns.

Aqua surveyed customers in Zephyr Shores in October 2009.

Like many Floridians, customers in Zephyr Shores get their water from the Floridan aquifer. The water can contain natural minerals that can accumulate in distribution system pipes. Sudden changes in flow in the distribution system can disturb deposits in the mains and cause discolored water. To address this issue, Aqua recently installed new flushing equipment and devised a systematic flushing schedule to clean the water mains. The program involves operating valves in a specific sequence to maximize the effectiveness of the flushing. This plan will address accumulated natural deposits in the mains and will reduce the incidents of discolored water.

Natural minerals in the water can also cause staining or deposit scale on fixtures over time and leave spots on glasses and dishes. Aqua has designed, permitted and installed a "sequestration" treatment system that will reduce the effects of natural minerals in the water. The FDEP has scheduled a clearance inspection for March 16, 2010, and Aqua expects to place the new treatment system in service shortly thereafter.

Many Zephyr Shores residents are "seasonal customers" — they live elsewhere during the summer months and return to Florida for the winter. That means water can sit in their service line or household plumbing for months, creating odors and discolored water. Customers might need to flush water through their fixtures and household plumbing after water has been standing in the pipes for an extended period of time.

Aqua management has been meeting with Zephyr Shores customers regularly to discuss customer concerns and create strategies to improve the look, taste and smell of their water. We will continue to talk with our customers and keep them informed as our plans progress.

Zephyrhills

- 71% of respondents rated Aqua's overall water service 1 or 2 on a scale of 1-5
- 68% of respondents are not satisfied with the taste of their water
- 64% of respondents are not satisfied with the odor of their water
- 46% of respondents are not satisfied with the color of their water
- 59% of respondents are not satisfied with the hardness of their water
- 48% of respondents are not satisfied with the reliability of their service
- 45% of respondents are not satisfied with Aqua's customer service
- 92% of respondents are not satisfied with the value of their water service for the money
- 65% of respondents rated Aqua's attention and response to water quality issues involved in providing water service 1 or 2 on a scale of 1-5

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

LABORATORY CERTIFICATION INFORMATION (to be completed by lab – Please type or print legibly)
ATTACH CURRENT DOH ANALYTE SHEET *

Lab Name: Advanced Environmental Laboratories, Inc Florida Certification #: E84589
Address: 9610 Princess Palm Avenue Certification Expiration Date: 06/30/2010
Tampa, FL 33619 Phone #: (813)630-9616

ANALYSIS INFORMATION (to be completed by lab) Date Sample(s) Received: 09/02/2009

PWS ID (From Page 1): [redacted] - Zephyr-Shores Sample Number (From Page 1): T0913617001

Lab Assigned Report Number or Job ID: T0913617001

Group(s) Analyzed & Results attached for compliance with Chapter 62-550, F.A.C. (Check all that apply):

Inorganics	Synthetic Organics	Volatile Organics	Disinfection Byproducts
☒ All 17	☐ All 30	☒ All 21	☐ Trihalomethanes
☐ Partial	☒ All Except Dioxin	☐ Partial	☐ Haloacetic Acids
☐ Nitrate	☐ Partial		☐ Bromate
☐ Nitrite	☐ Dioxin Only	Radionuclides	☐ Chlorite
☐ Asbestos Only		☒ Single Sample	
		☐ Qtrly Composite**	Secondaries
			☒ All 14
			☐ Partial

Were any analyses subcontracted? ☒ Yes ☐ No
If yes, please provide DOH certification numbers: E82574, E82001, E83033
ATTACH DOH ANALYTE SHEET FOR EACH SUBCONTRACTED LAB *

CERTIFICATION

I, Tammie Heslin (Print Name), Project Manager (Print Title)

do HEREBY CERTIFY that all attached analytical data are correct and unless noted meet all requirements of the National Environmental Laboratory Accreditation Conference (NELAC).

Signature: [signature] Date: 09/29/2009

* Failure to provide a valid and current Florida DOH lab certification number and a current Analyte Sheet for the attached analysis results will result in rejection of the report, possible enforcement against the public water system for failure to sample, and may result in notification of the DOH Bureau of Laboratory Services.
** Please provide radiological sample dates & locations for each quarter.

COMPLIANCE DETERMINATION (to be completed by DEP or DOH)

Sample Collection Info Satisfactory: ☐ Yes ☐ No Sample Analysis Info Satisfactory: ☐ Yes ☐ No
☐ Replacement Sample(s) Requested (circle or highlight group(s) above) ☐ Revised Report Requested (circle or highlight group(s) above)
☐ Additional Monitoring Required (circle or highlight group(s) above)

Reason(s): ☐ MCL(s) Exceeded ☐ Detection(s) ☐ Incomplete Report
☐ Missing Analyte Sheet(s) ☐ Location Unsatisfactory ☐ Analysis Unsatisfactory
☐ Other: _____

Person Notified: _____ Date Notified: _____
Comments: _____
Date Reviewed: _____ DEP/DOH Reviewing Official: _____

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

[redacted]
62-550.310(1)

Report Number / Job ID: T0913617001

PWS ID (From Page 1): 6512018

Contam ID	Contaminant Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification
1040	Nitrate	10	mg/L	0.039	U	SM 4500NO3-F	0.039	09/03/2009	11:04	E84589
1041	Nitrite	1	mg/L	0.022	U	SM 4500NO3-F	0.022	09/03/2009	11:04	E84589
1005	Arsenic	0.010	mg/L	0.0042		EPA 200.8	0.00012	09/15/2009	22:45	E82574
1010	Barium	2	mg/L	0.013		EPA 200.8	0.00027	09/15/2009	22:45	E82574
1015	Cadmium	0.005	mg/L	0.00020	U	EPA 200.8	0.00020	09/15/2009	22:45	E82574
1020	Chromium	0.1	mg/L	0.00050	U	EPA 200.7	0.00050	09/16/2009	15:08	E82574
1024	Cyanide	0.2	mg/L	0.00097	U	SM 4500-CN-E	0.00097	09/08/2009	14:49	E84589
1025	Fluoride	4.0	mg/L	0.15	I	EPA 300.0	0.055	09/08/2009	13:01	E84589
1030	Lead	0.015	mg/L	0.00013	I	EPA 200.8	0.000037	09/15/2009	22:45	E82574
1035	Mercury	0.002	mg/L	0.000014	U	EPA 245.1	0.000014	09/16/2009	13:23	E82574
1036	Nickel	0.1	mg/L	0.0011	U	EPA 200.7	0.0011	09/16/2009	15:08	E82574
1045	Selenium	0.05	mg/L	0.00063	U	EPA 200.8	0.00063	09/15/2009	22:45	E82574
1052	Sodium	160	mg/L	8.8		EPA 200.7	0.026	09/16/2009	15:08	E82574
1074	Antimony	0.006	mg/L	0.000091	U	EPA 200.8	0.000091	09/15/2009	22:45	E82574
1075	Beryllium	0.004	mg/L	0.00013	U	EPA 200.7	0.00013	09/16/2009	15:08	E82574
1085	Thallium	0.002	mg/L	0.000026	U	EPA 200.8	0.000026	09/15/2009	22:45	E82574

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, X, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

[redacted]
62-550.320

Report Number / Job ID: T0913617001

PWS ID (From Page 1): 6512018

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier	Analytical Method	Lab MDL	Analysis Date	Analysis Time	DOH Lab Certification #
1002	Aluminium	0.2	mg/L	0.061	U	EPA 200.7	0.061	09/16/2009	15:06	E82574
1017	Chloride	250	mg/L	11		EPA 300.0	2.3	09/08/2009	13:01	E84589
1022	Copper	1	mg/L	0.0046		EPA 200.8	0.000085	09/15/2009	22:45	E82574
1025	Fluoride	2.0	mg/L	0.15	I	EPA 300.0	0.055	09/08/2009	13:01	E84589
1028	Iron	0.3	mg/L	0.29		EPA 200.7	0.038	09/16/2009	15:06	E82574
1032	Manganese	0.05	mg/L	0.0031		EPA 200.8	0.000073	09/15/2009	22:45	E82574
1050	Silver	0.1	mg/L	0.000086	U	EPA 200.8	0.000086	09/15/2009	22:45	E82574
1055	Sulfate	250	mg/L	2.1	U	EPA 300.0	2.1	09/08/2009	13:01	E84589
1095	Zinc	5	mg/L	0.039		EPA 200.8	0.00041	09/15/2009	22:45	E82574
1905	Color	15	Color Units	7.2		SM 2120B	3.2	09/03/2009	16:54	E84589
1920	Odor	3	TON@40°C	1		SM 2150B	1.0	09/03/2009	08:30	E84589
1925	pH	6.5 - 8.5	pH unit	7.7		EPA 150.1		09/03/2009	16:20	E84589
1930	Total Dissolved Solids	500	mg/L	270		EPA 160.1	10	09/04/2009	08:31	E84589

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

[redacted]
62-550.310(6)

Report Number / Job T0913617001

PWS ID (From Page 1): 6512018

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier*	Analytical Method	Lab MDL	RDL	Analysis Error	Analysis Date	Analysis Time	DOH Lab Certification #
4006	Combined Uranium (U-234,U-235, & U-238)	30	ug/L	0.18	I	EPA 200.8	0.031	0.031		09/15/2009	22:45	E82574

** If the results exceed 5 pCi/L, a measurement for radium-226 is required.

*** If the results exceed 5 pCi/L, a measurement for radium-226 is required. If the results exceed 15 pCi/L, measurements for radium-226 and uranium are required.

**** If uranium (U) is reported as a measurement of activity (pCi/L) it will be converted to a mass measurement (µg/L) by multiplying the result by 1.5.

***** Reserved

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

62-550.310(4)(a)

Report Number / Job ID: T0913617001

PWS ID (From Page 1): 6512018

Contam ID	Contam Name	MCL	Units	Method Detect	Qualifier	Analytical Method	Lab MDL	RDL	Analysis Date	Analysis Time	DOH Lab Certification #
2378	1,2,4-Trichlorobenzene	70	ug/L	0.22	U	EPA 524.2	0.22	0.5	09/06/2009	11:33	E82574
2380	cis-1,2-Dichloroethylene	70	ug/L	0.12	U	EPA 524.2	0.12	0.5	09/06/2009	11:33	E82574
2955	Xylenes (total)	10,000	ug/L	0.37	U	EPA 524.2	0.37	0.5	09/06/2009	11:33	E82574
2964	Methylene Chloride	5	ug/L	0.32	U	EPA 524.2	0.32	0.5	09/06/2009	11:33	E82574
2966	o-Dichlorobenzene	600	ug/L	0.15	U	EPA 524.2	0.15	0.5	09/06/2009	11:33	E82574
2969	para-Dichlorobenzene	75	ug/L	0.26	U	EPA 524.2	0.26	0.5	09/06/2009	11:33	E82574
2976	Vinyl Chloride	1	ug/L	0.20	U	EPA 524.2	0.20	0.5	09/06/2009	11:33	E82574
2977	1,1-Dichloroethylene	7	ug/L	0.17	U	EPA 524.2	0.17	0.5	09/06/2009	11:33	E82574
2979	trans-1,2-Dichloroethylene	100	ug/L	0.27	U	EPA 524.2	0.27	0.5	09/06/2009	11:33	E82574
2980	1,2-Dichloroethane	3	ug/L	0.18	U	EPA 524.2	0.18	0.5	09/06/2009	11:33	E82574
2981	1,1,1-Trichloroethane	200	ug/L	0.20	U	EPA 524.2	0.20	0.5	09/06/2009	11:33	E82574
2982	Carbon tetrachloride	3	ug/L	0.24	U	EPA 524.2	0.24	0.5	09/06/2009	11:33	E82574
2983	1,2-Dichloropropane	5	ug/L	0.21	U	EPA 524.2	0.21	0.5	09/06/2009	11:33	E82574
2984	Trichloroethylene	3	ug/L	0.14	U	EPA 524.2	0.14	0.5	09/06/2009	11:33	E82574
2985	1,1,2-Trichloroethane	5	ug/L	0.28	U	EPA 524.2	0.28	0.5	09/06/2009	11:33	E82574
2987	Tetrachloroethylene	3	ug/L	0.24	U	EPA 524.2	0.24	0.5	09/06/2009	11:33	E82574
2989	Chlorobenzene	100	ug/L	0.19	U	EPA 524.2	0.19	0.5	09/06/2009	11:33	E82574
2990	Benzene	1	ug/L	0.17	U	EPA 524.2	0.17	0.5	09/06/2009	11:33	E82574
2991	Toluene	1,000	ug/L	0.21	U	EPA 524.2	0.21	0.5	09/06/2009	11:33	E82574
2992	Ethylbenzene	700	ug/L	0.13	U	EPA 524.2	0.13	0.5	09/06/2009	11:33	E82574
2996	Styrene	100	ug/L	0.11	U	EPA 524.2	0.11	0.5	09/06/2009	11:33	E82574

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

Florida Department of Environmental Protection
Safe Drinking Water Program Laboratory Reporting Format

[redacted]
62-550.310(4)(b)

Report Number / Job ID: T0913617001
PWS ID (From Page 1): 6512018

Contam ID	Contam Name	MCL	Units	Analysis Result	Qualifier	Analytical Method	Lab MDL	RDL	Extraction Date	Analysis Date	Analysis Time	DOH Lab Certification
2005	Endrin	2	ug/L	0.0017	U	EPA 508	0.0017	0.01	09/05/2009	09/07/2009	20:36	E82574
2010	gamma-BHC (Lindane)	0.2	ug/L	0.0036	U	EPA 508	0.0036	0.02	09/05/2009	09/07/2009	20:36	E82574
2015	Methoxychlor	40	ug/L	0.011	U	EPA 508	0.011	0.1	09/05/2009	09/07/2009	20:36	E82574
2020	Toxaphene	3	ug/L	0.098	U	EPA 508	0.098	1	09/05/2009	09/07/2009	20:36	E82574
2031	Delapon	200	ug/L	1.0	U	EPA 515.3	1.0	1	09/03/2009	09/08/2009	09:01	E82574
2032	Diquat	20	ug/L	7.6	U	EPA 549.2	7.6	0.4	09/03/2009	09/08/2009	11:51	E82574
2033	Endothall	100	ug/L	2.8	U	EPA 548.1	2.8	9	09/08/2009	09/16/2009	09:34	E82574
2034	Glyphosate	700	ug/L	6.5	U	EPA 547	6.5	6	09/15/2009	09/15/2009	14:06	E82574
2035	Di(2-ethylhexyl)adipate	400	ug/L	0.95	U	EPA 525.2	0.95	0.6	09/08/2009	09/08/2009	22:05	E82574
2036	Oxamyl (Vydate)	200	ug/L	0.57	U	EPA 531.1	0.57	2	09/04/2009	09/04/2009	23:41	E82574
2037	Simazine	4	ug/L	0.19	U	EPA 525.2	0.19	0.07	09/08/2009	09/08/2009	22:05	E82574
2039	bis(2-Ethylhexyl) phthalate	6	ug/L	1.5	U	EPA 525.2	1.5	0.6	09/08/2009	09/08/2009	22:05	E82574
2040	Picloram	500	ug/L	0.23	U	EPA 515.3	0.23	0.1	09/03/2009	09/08/2009	09:01	E82574
2041	Dinoseb	7	ug/L	0.86	U	EPA 515.3	0.86	0.2	09/03/2009	09/08/2009	09:01	E82574
2042	Hexachlorocyclopentadiene	50	ug/L	0.016	U	EPA 508	0.016	0.1	09/05/2009	09/07/2009	20:36	E82574
2046	Carbofuran	40	ug/L	0.28	U	EPA 531.1	0.28	0.9	09/04/2009	09/04/2009	23:41	E82574
2050	Atrazine	3	ug/L	0.16	U	EPA 525.2	0.16	0.1	09/08/2009	09/08/2009	22:05	E82574
2051	Alachlor	2	ug/L	0.26	U	EPA 525.2	0.26	0.2	09/08/2009	09/08/2009	22:05	E82574
2065	Heptachlor	0.4	ug/L	0.0068	U	EPA 508	0.0068	0.04	09/05/2009	09/07/2009	20:36	E82574
2067	Heptachlor Epoxide	0.2	ug/L	0.0033	U	EPA 508	0.0033	0.02	09/05/2009	09/07/2009	20:36	E82574
2105	2,4-D	70	ug/L	1.5	U	EPA 515.3	1.5	0.1	09/03/2009	09/08/2009	09:01	E82574
2110	2,4,5-TP (Silvex)	50	ug/L	0.32	U	EPA 515.3	0.32	0.2	09/03/2009	09/08/2009	09:01	E82574
2274	Hexachlorobenzene	1	ug/L	0.0063	U	EPA 508	0.0063	0.1	09/05/2009	09/07/2009	20:36	E82574
2306	Benzo(a)pyrene	0.2	ug/L	0.096	U	EPA 525.2	0.096	0.02	09/08/2009	09/08/2009	22:05	E82574
2326	Pentachlorophenol	1	ug/L	0.069	U	EPA 515.3	0.069	0.04	09/03/2009	09/08/2009	09:01	E82574
2383	Polychlorinated biphenyls(PCB)	0.5	ug/L	0.12	U	EPA 508	0.12	0.1	09/05/2009	09/07/2009	20:36	E82574
2931	Dibromochloropropane	0.2	ug/L	0.0082	U	EPA 504.1	0.0082	0.02	09/11/2009	09/14/2009	10:18	E82574
2946	Ethylene Dibromide (EDB)	0.02	ug/L	0.0091	U	EPA 504.1	0.0091	0.01	09/11/2009	09/14/2009	10:18	E82574
2959	Chlordane	2	ug/L	0.052	U	EPA 508	0.052	0.2	09/05/2009	09/07/2009	20:36	E82574

NOTE: Effective January 1, 2004, results indicating non-detection with a reported lab MDL >50% of the MCL will not be accepted for compliance with 62-550.310(4)(b).

*Results must be reported with appropriate qualifiers in accordance with Florida Administrative Code Rule 62-160, Table 1. Results qualified with A, F, H, N, O, T, Z, ?, *, are unacceptable for compliance with 62-550. Results qualified with a J, Q, R, or Y must be accompanied by written justification and will be evaluated on a case by case basis. To avoid a monitoring violation, unacceptable results must be replaced with acceptable results from samples collected during the same monitoring period.

AQUA

Tomoka View PWS Flushing Plan

January 2010

Purpose:

The purpose of this flushing program is to maintain quality and appearance of the water in the Tomoka View water distribution system.

Intent:

The intent of this plan is to provide guidelines to operations personnel in daily operations. Specific conditions in the distribution system may dictate additional flushing and monitoring.

Distribution System Monitoring, Action Levels, & Actions:

Manual conventional flushing may be necessary should conditions dictate in response to water quality parameters approaching the trigger in Table 1, or in response to customer complaints of black or discolored water or taste and odor. In these cases, flushing will be conducted to achieve and maintain goals for the water quality parameters specified in Table 1. The water quality parameters should be tested twice per week at the point of entry and at least two locations in the distribution system and the MRT for a total of four locations.

Table 1. Distribution System Action Levels and Actions

Parameter	Goals	Action Level	Action
Total Cl_2 Residual	>2 mg/L as Cl_2	<2 mg/L as Cl_2	Flush until residual >2 mg/L as Cl_2
Free NH_3-N	<0.5 mg/L as N	>0.5 mg/L as N	Increase plant Cl_2/NH_3 ratio, start daily monitoring, if not <0.5 mg/L after 2 days flush until <0.5 mg/L as N
pH	7.9-8.3	N/A	Monitor
NO_2-N	<0.1 mg/L as N	>0.1 mg/L as N	Monitor daily if 0.1 – 0.3 mg/L as N If >0.3 mg/L as N, revert to free chlorine

Automatic Flushing:

The following locations currently have automatic flushing devices installed and shall continue to be programmed to run/flush as indicated:

Table 2. Automatic Flushing Device Location and Schedule

Location	Frequency	Duration per Event
265 Cherokee Ave	2 per day	1 hour
380 Seminole Dr.	2 per day	1 hour
109 Seminole Dr.	2 per day	1 hour
160 Greenbriar Ln.	2 per day	1 hour

Unidirectional Flushing:

The following locations shall be manually flushed (unidirectionally) as indicated below until water is visibly clear and an acceptable total chlorine residual is achieved. Flush each section in its entirety before moving to the next section. Refer to the system flushing map for locations of flush points and valves. The system should be unidirectionally flushed twice per year. Additional manual flushing should be performed by section in response to customer complaints or water quality parameter triggers in a particular section.

Section	Open and Close Valves in this Order Left to Right	Valves to Close	Hydrant # or B/O # to open	Time to Flush (minute)	Minimum Gallons Flushed	Hydrant # or B/O # to Close	Valves to Open	Special Notes: GPM & PSI
NORTH	Flush Point #1	#11	#1	6	700	#1	#11	Flushing should be at 120 GPM or higher. Plant Not to go Below 35 PSI or Water Storage level to drop too low.
	Flush Point #2	#5, #6	#9	3	300	#9	#6	
	Flush Point #3	#3	#2	3	350	#2	#5, #3	
	Flush Point #4	#16, #7	#2	4	450	#2	#7, #16	
CENTER	Flush Point #5	#14, #18	#36	1	150	#36	#14, #18	
	Flush Point #6	#12, #23, #24	#33	2	200	#33	#12, #23	
	Flush Point #7	#13, #19, #22	#33	5	600	#33	#24	
	Flush Point #9	#28	#34	1	100	#34	#13, #19, #22 #28	
	Flush Point #10	#23, #27	#34	1	150	#34	#23	
	Flush Point #8	#14, #20, #25	#34	5	650	#34	#14, #20, #25 #27	
SOUTH	Flush Point #12	#14, #16, #18	#32	1	150	#31	#14, #16, #18	
	Flush Point #11	#20, #25, #27 #28	#31	3	350	#32	#20, #25, #27 #28	

Implementation:

The flushing program will be implemented at the time chloramination goes online in the Tomoka View water system and shall remain in effect while the system is on chloramination.

Rosalie Oaks Flushing Plan

Purpose:

The purpose of this program is to insure the quality of the potable water provided to the Aqua Utility Florida, Inc. customers in the Rosalie Oaks service area. The population consists of seasonal/weekend customers, therefore proper flushing is important to provide quality water.

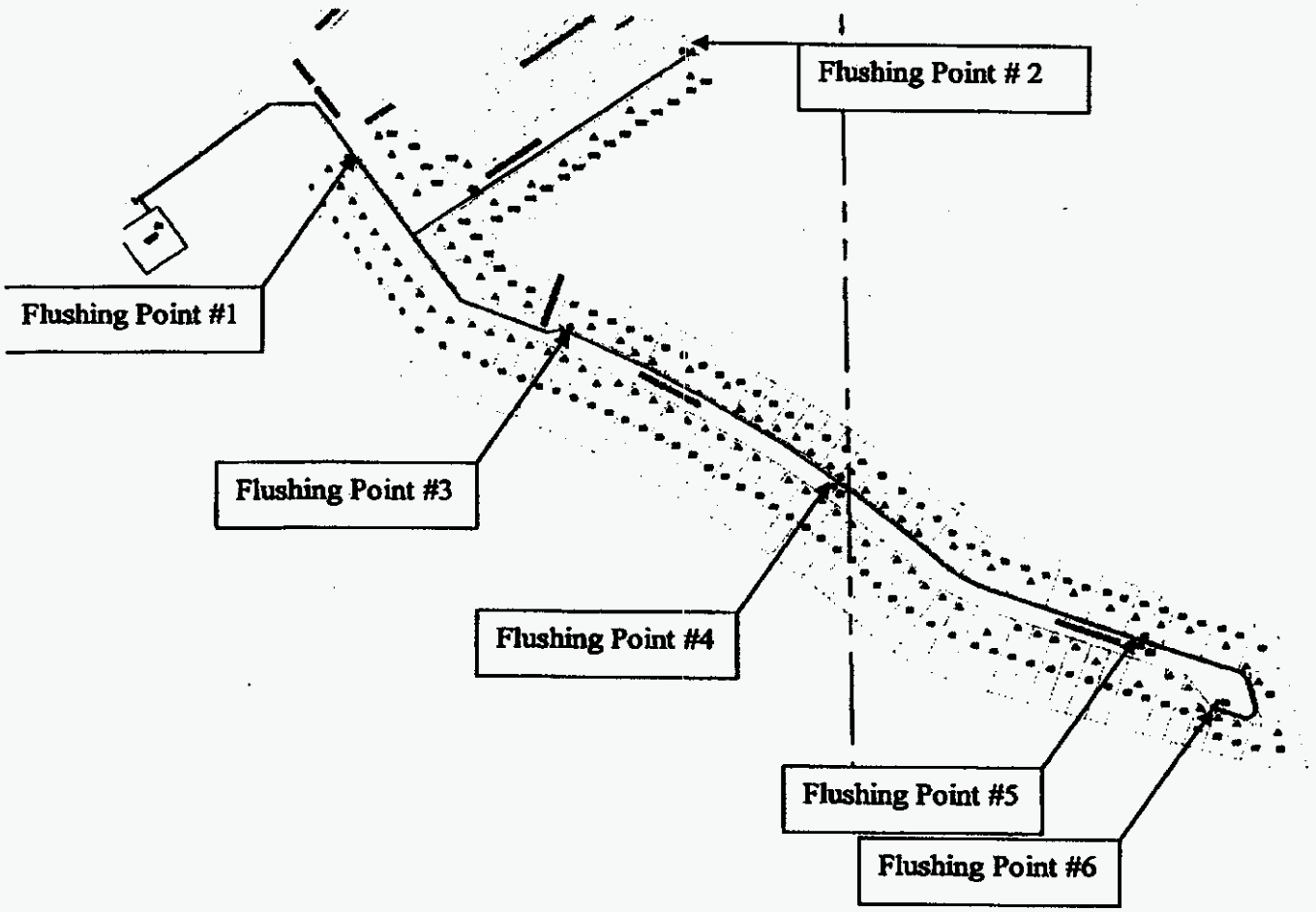
Intent:

The intent of this program is to provide minimum guidelines to operations personnel in daily operations. Specific conditions in the distribution system and customer complaints may dictate additional flushing and monitoring.

Flushing:

The system shall be flushed directionally in the order below every Thursday. At a minimum, each flush point shall flush the volume of water specified.

Street Name	Lin. Ft. from POE, Blow off or Last Line change	Line Diameter (In)	Gallons of water	Total Gallons
Flush Point # 1	675	8	1762	1762
Flush Point # 2	250	6	367	
	875	4	571	938
Flush Point # 3	500	6	734	734
Flush Point # 4	800	6	1174	1174
Flush Point # 5	900	6	1321	1321
Flush Point # 6	500	2	82	82


Flushing Point # 2
Flushing Point #1
Flushing Point #3
Flushing Point #4
Flushing Point #5
Flushing Point #6

AQUA

Zephyr Shores PWS Flushing Plan

Purpose:

The purpose of this flushing program is to maintain quality and appearance of the water in the Zephyr Shores water distribution system.

Intent:

The intent of this plan is to provide guidelines to operations personnel in daily operations. Specific conditions in the distribution system may dictate additional flushing and monitoring.

Distribution System Monitoring, Action Levels, & Actions:

Manual conventional flushing may be necessary at any time should conditions dictate in response to water quality parameters approaching the trigger in Table 1, or in response to customer complaints of black or discolored water or taste and odor. In these cases, flushing will be conducted to achieve and maintain chlorine residuals at or above the minimums in Table 1.

Table 1. Distribution System Action Levels and Actions

Parameter	Goals	Action Level	Action
Free Chlorine Residual	>0.2 mg/L as Cl_2	<0.2 mg/L as Cl_2	Flush until residual >0.5 mg/L as Cl_2

Unidirectional Flushing:

The following locations shall be manually unidirectionally flushed as indicated below until water is visibly clear and an acceptable chlorine residual is achieved. Completely flush each section in its entirety before moving to the next section. Refer to the system flushing map for locations of flush points and valves. The system should be unidirectionally flushed twice per year or more often as customer complaints or water quality dictates.

FLUSH POINT TYPE	FLUSH POINT #	VALVES TO CLOSE	HYDRANT # OR BLOW OFF # TO OPEN	HYDRANT # OR BLOW OFF # TO CLOSE	VALVES TO OPEN
BLOW OFF	ZEPHYR SHORES - 1	6, 8, 13	12 (4541 WINDY)	12	6 L/C, 8 L/C, 13
BLOW OFF	2	6 A/C, 7, 8 A/C, 19, 20	12 (4541 WINDY)	12	6, 7 L/C, 8 L/C, 19, 20 L/C
BLOW OFF	3	7 A/C, 8 A/C, 13, 20 A/C	12 (4541 WINDY)	12	7, 8, 13, 20
BLOW OFF	4	10, 11, 61	23 (4600 CLARICE)	23	11, 10 L/C, 61
BLOW OFF	5	6, 10 A/C, 13, 14	9 (34834 CARL - BACK YARD)	9	6, 10 L/C, 13, 14
BLOW OFF	6	8, 10 A/C, 16	59 (34824 CARL - ACROSS STREET)	59	8, 10 L/C, 16
BLOW OFF	7	10 A/C, 14	17 (SIX MILE POND - END OF STREET)	17	10, 14
BLOW OFF	8	11, 16	64 (4625 WINDY - BACK YARD)	64	11, 16
BLOW OFF	9	18, 20, 21, 22, 24	58 (4722 WINDY - END OF STREET)	58	18, 20, 21, 22, 24 L/C
BLOW OFF	10	24 A/C, 25 ALWAYS CLOSED	65 (ZEPHYR SHORES)	65	24, 25 STAYS CLOSED
BLOW OFF	11	26	62 (ADA - END OF STREET - BACK)	62	26
FIRE HYDRANT	AMERICAN CONDOS - 12	31, 32, 33, 39	36 (JADE - CORNER OF POND)	36	31, 32, 33 L/C, 39 L/C
FIRE HYDRANT	13	33 A/C, 39 A/C, 45	66 (ELWANA)	66	33, 39, 45
BLOW OFF	14	37, 38, 46	54 (BOBBY)	54	37, 38, 46
FIRE HYDRANT	15	41, 45	40 (CYNTHIA)	40	41, 45 L/C
FIRE HYDRANT	16	32, 45 A/C, 46	47 (GARBER)	47	32, 45, 46 L/C
FIRE HYDRANT	17	46 A/C	60 (DANNY)	60	46
BLOW OFF	18	52	67 (BRITINI)	67	52
FIRE HYDRANT	19	48	50 (BRITINI)	50	48 L/C
BLOW OFF	20	48 A/C	55 (TIFFANI)	55	48 L/C

FIRE HYDRANT	21	29, 33, 34, 48 A/C	30 (CONDOMINIUM)	30	29, 33 L/C, 34, 48
BLOW OFF	22	31, 32, 33 A/C, 39	56 (AC ENTRY)	56	31, 32, 33, 39

Implementation:

The flushing program is currently being implemented in the Zephyr Shores water system and shall remain in effect until the system is on chloramination.

AQUA

Leisure Lakes PWS Flushing Plan

Purpose:

The purpose of this flushing program is to maintain quality and appearance of the water in the Leisure Lakes water distribution system.

Intent:

The intent of this plan is to provide guidelines to operations personnel in daily operations. Specific conditions in the distribution system may dictate additional flushing and monitoring.

Distribution System Monitoring, Action Levels, & Actions:

Manual conventional flushing may be necessary at any time should conditions dictate in response to water quality parameters approaching the trigger in Table 1, or in response to customer complaints of black or discolored water or taste and odor. In these cases, flushing will be conducted to achieve and maintain chlorine residuals at or above the minimums in Table 1.

Table 1. Distribution System Action Levels and Actions

Parameter	Goals	Action Level	Action
Free Chlorine Residual	>0.2 mg/L as Cl_2	<0.2 mg/L as Cl_2	Flush until residual >0.5 mg/L as Cl_2

Unidirectional Flushing:

The following locations shall be manually unidirectionally flushed as indicated below until water is visibly clear and an acceptable chlorine residual is achieved. Completely flush each section in its entirety before moving to the next section. Refer to the system flushing map for locations of flush points and valves. The system should be unidirectionally flushed twice per year or more often as customer complaints or water quality dictates.

Flushing Plan - Leisure Lakes

Open and Close Valves in this Order Left to Right	Valves to Close	Hydrant # or B/O # to open	Time to Flush (minute)	Minimum Gallons Flushed	Hydrant # or B/O # to Close	Valves to Open	Special Notes: GPM & PSI
Flush Point #1	N/A	FH 13	10		FH 13	N/A	Flushing should be at 120 GPM or higher.
Flush Point #2	V20	FH 12	30		FH 12	N/A	
Flush Point #3	V29	FH 10	30		N/A	V20	
Flush Point #4	V37, V36, V31	FH 10	30		FH 10	V29	
Flush Point #5	N/A	FH 7	30		FH 7	N/A	
Flush Point #6	N/A	FH 8	30		FH 8	NA	
Flush Point #7	V3	FH 9	30		_	NA	
Flush Point #8	V4	"	30		_	NA	Plant Not to go Below 35 PSI or Water Storage level to drop to low.
Flush Point #9	V5	"	30		FH 9	N/A	
Flush Point #10	N/A	FH 6	30			V3	
Flush Point #11	V2	"	30		FH 6	V2, V3, V4, V31, V36, V37	
Flush Point #12	V15	FH 4	30		FH 4	N/A	
Flush Point #13	V10	FH 2	30		FH 2	N/A	
Flush Point #14	N/A	FH 3	30		FH 3	V10, V15	

Implementation:

The flushing program is currently being implemented in the Leisure Lakes water system and shall remain in effect until the system is on chloramination.

Serratia marcescens

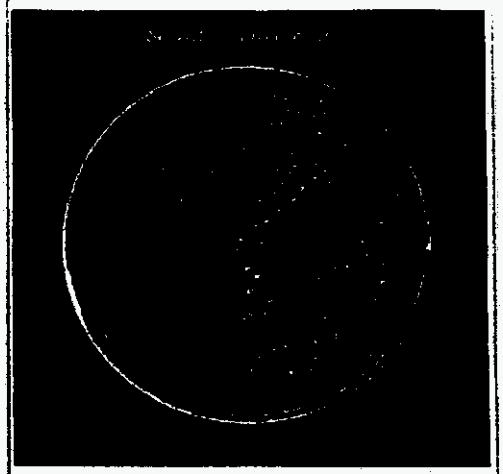
From Wikipedia, the free encyclopedia

Serratia marcescens is a species of Gram-negative, rod-shaped bacterium in the family Enterobacteriaceae. A human pathogen, *S. marcescens* is involved in nosocomial infections, particularly catheter-associated bacteremia, urinary tract infections and wound infections,[1][2] and is responsible for 1.4% of nosocomial bacteremia cases in the United States.[3] It is commonly found in the respiratory and urinary tracts of hospitalized adults and in the gastrointestinal system of children.

Due to its ubiquitous presence in the environment, and its preference for damp conditions, *S. marcescens* is commonly found growing in bathrooms (especially on tile grout, shower corners, toilet water line, and basin), where it manifests as a pink discoloration and slimy film feeding off phosphorus-containing materials or fatty substances such as soap and shampoo residue. Once established, complete eradication of the organism is often difficult, but can be accomplished by application of a bleach-based disinfectant. Rinsing and drying surfaces after use can also prevent the establishment of the bacteria by removing its food source and making the environment less hospitable.

S. marcescens may also be found in environments such as dirt, supposedly "sterile" places, and the subgingival biofilm of teeth. Due to this, and the fact that *S. marcescens* produces a reddish-orange tripyrrole pigment called prodigiosin, *S. marcescens* may cause extrinsic staining of the teeth. The biochemical pathway illustrating the production of prodigiosin by *S. marcescens* is unknown except for the final two steps. In these steps, a monopyrrole (MAD) and a bipyrrole (MBC) undergo a condensation reaction by way of a condensing enzyme to ultimately form prodigiosin.

Serratia marcescens



S. marcescens on an XLD agar plate.

Scientific classification

Kingdom:	Bacteria
Phylum:	Proteobacteria
Class:	Gamma Proteobacteria
Order:	Enterobacteriales
Family:	Enterobacteriaceae
Genus:	*Serratia*
Species:	***S. marcescens***

Binomial name

Serratia marcescens
Bizio 1823

Contents

Identification

S. marcescens is a motile organism and can grow in temperatures ranging from 5–40°C and in pH levels

ranging from 5 to 9. It is differentiated from other Gram-negative bacteria by its ability to perform casein hydrolysis, which allows it to produce extracellular metalloproteinases which are believed to function in cell-to-extracellular matrix interactions. *S. marcescens* also exhibits tryptophan and citrate degradation. One of the end products of tryptophan degradation is pyruvic acid, which is then incorporated into different metabolic processes of *S. marcescens*. A final product of citrate degradation is carbon. Thus, *S. marcescens* can rely on citrate as a carbon source. In identifying the organism one may also perform a *methyl red test*, which determines if a microorganism performs mixed-acid fermentation. *S. marcescens* results in a negative test. Another determination of *S. marcescens* is its capability to produce lactic acid via oxidative and fermentative metabolism. Therefore, it is said that *S. marcescens* is lactose O/F+.[4]

Pathogenesis

S. marcescens can cause infection in several sites, including the urinary tract, respiratory tract, wounds,[3] and the eye, where it may cause conjunctivitis, keratitis, endophthalmitis, and tear duct infections.[5] It is also a rare cause of endocarditis and osteomyelitis (particularly in people who use intravenous drugs recreationally), pneumonia, and meningitis.[2][3] Most *S. marcescens* strains are resistant to several antibiotics because of the presence of R-factors, which are a type of plasmid that carry one or more genes that encode resistance; all are considered intrinsically resistant to ampicillin, macrolides, and first-generation cephalosporins (such as cefalexin).[2]

In elkhorn coral, *S. marcescens* is the cause of the disease known as white pox disease.[6] In silkworms, it sometimes occurs as a secondary pathogen in viral flacherie disease.[*citation needed*]

Also in Drosophila research laboratories, infection with *S. marcescens* is common. It manifests itself as a pink discolouration or plaque in or on larvae, pupae, or the usually starch and sugar-based food (especially when improperly prepared).

History

Serratia marcescens was discovered in 1819 by Venetian pharmacist Bartolomeo Bizio, as the cause of an episode of blood-red discoloration of polenta in the city of Padua.[7] Bizio named the organism four years later in honor of Serafino Serrati, a physicist who developed an early steamboat; the epithet *marcescens* (Latin for "decaying") was chosen because of the pigment's rapid deterioration (Bizio's observations led him to believe that the organism decayed into a mucilage-like substance upon reaching maturity).[8] *Serratia* was later renamed *Monas prodigiosus* and *Bacillus prodigiosus* before Bizio's original name was restored in the 1920s.[7]

Until the 1950s, *S. marcescens* was erroneously believed to be a non-pathogenic "saprophyte",[3] and its reddish coloration was used in school experiments to track infections. It has also been used as a simulant in biological warfare tests by the United States Military.[9][10] On September 26 and 27, 1950, the United States Navy conducted a secret experiment named "Operation Sea-Spray" in which some *S. marcescens* was released by bursting balloons of it over urban areas of the San Francisco Bay Area in California. Although the Navy later claimed the bacteria were harmless, beginning on September 29 eleven patients at a local hospital developed very rare, serious urinary tract infections and one of these individuals, Edward J. Nevin, died. Cases of pneumonia in San Francisco also increased after *S. marcescens* was released.[11],[12]

Since 1950, *S. marcescens* has steadily increased as a cause of human infection, with many strains resistant to multiple antibiotics.[1] The first indications of problems with the influenza vaccine produced by Chiron Corporation in 2004 involved *S. marcescens* contamination.

Because of its red pigmentation, caused by expression of the pigment prodigiosin,[13] and its ability to grow on bread, *S. marcescens* has been evoked as a naturalistic explanation of Medieval accounts of the "miraculous" appearance of blood on the Eucharist that led to Pope Urban IV instituting the Feast of Corpus Christi in 1264. This followed celebration of a Mass at Bolsena in 1263, led by a Bohemian priest who had doubts concerning transubstantiation, or the turning of bread and wine into the Body and Blood of Christ during the Mass. During the Mass, the Eucharist appeared to bleed and each time the priest wiped away the blood, more would appear. While it is possible that Serratia could generate a single appearance of red pigment, it is unclear how it could have generated more pigment after each wiping, leaving this proposed explanation open to doubt. This event is celebrated in a fresco in the Apostolic Palace in the Vatican City, painted by Raphael.[14]

In early 2008 the U.S. Food and Drug Administration (FDA) issued a nationwide recall of one lot of Pre-Filled Heparin Lock Flush Solution USP [15]. The heparin IV flush syringes had been found to be contaminated with *Serratia marcescens*, which resulted in patient infections. The Centers for Disease Control (CDC) confirmed growth of *Serratia marcescens* from several unopened syringes of this product.

References

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External links

- *med/2103* at eMedicine

Northshore Utility District

ADDRESS
6830 NE 185th Street
Kenmore WA 98028-2684
PO Box 82489
Kenmore WA 98028-0489

TELEPHONES
Engineering: (425) 398-4401
Administration: (425) 398-4402
Operations: (425) 398-4403
Information: (425) 398-4400

FAX NUMBERS
Administration: (425) 398-4430
Operations: (425) 398-4432
Purchasing: (425) 398-4434
Website: www.nud.net

What is that black "stuff" in my toilet, shower or pet's dish?

Each year, a few Northshore Utility District customers call to ask about a black slimy substance that occasionally forms in moist areas around their home. Customers most frequently observe it in toilet bowls, on the surfaces in shower stalls and bathtub enclosures, in sinks and pet water dishes.

A black fungus or mold is thought to be the cause of the black stuff. The fungus or mold is common inhabitants of our environment. They can be found in many places, including human and animal feces, dust soil, and surface water. The fungus or mold will grow in any moist location where phosphorous containing materials or fatty substances accumulate. Sources of these substances include soap residue in bathing areas, feces in toilets, soap and food residues in pet dishes. The fungus or mold can also grow in locations such as toilets. The chlorine residual will dissipate from the toilet where water is left standing for an extended period of time. The black fungus or mold is not known to cause any waterborne diseases.

Once the fungus or mold is established, it cannot be eliminated entirely. However, periodic and thorough cleaning of the surfaces followed by disinfection with chlorine bleach can control the fungus or mold. Scrub the surfaces with a brush and household cleaner. Disinfect the surfaces with a strong chlorine bleach solution, let stand for 10-20 minutes and thoroughly rinse away with clean water.

To control the growth in the toilet, thoroughly clean the toilet bowl with a brush and a toilet bowl cleaner. Disinfect the toilet bowl rim with a chlorine solution. You may also add a ¼ cup of chlorine bleach to the toilet tank. Let the solution stand for 10-20 minutes. Flush the toilet a couple of times to rinse the disinfectant out of the toilet tank and the toilet bowl.

If you have any questions regarding this mold, please contact Mick Holte our Water Quality Coordinator at (425) 398-4417.

Accountable Management - Responsible Usage

FAQs

What is the source of our water?

Our customers receive water purchased from the city of Hamilton, supplemented with water purchased from the Cincinnati Waterworks. Both cities use and treat water from the Great Miami Buried Valley Aquifer, an underground water basin. The city of Cincinnati also uses and treats water from the Ohio River.

The water is treated to meet stringent water quality standards. It is pumped into storage tanks located throughout Butler County until it is sent into our distribution system to be delivered to your home or business.

Tap Water	Bottled Water
Regulated by EPA	Regulated by FDA
Costs pennies a day—about $.0004 per gallon	Costs $.80 - $4.00 per gallon
Contains essential nutrients such as calcium and iron	Some bottlers filter out nutrients- Check the label or contact the supplier.
Residual chlorine prevents bacterial growth	Some do not have a residual disinfectant to prevent bacterial growth as water ages

Is bottled water safer than tap water?

Not necessarily. Check the bottled water label or contact the bottled water supplier for test results on their product. Under special circumstances, such as during an emergency, bottled water can be a good choice.

The U.S. Environmental Protection Agency regulates public water systems. As shown in our Consumer Confidence Report (CCR), BCWS's water supply meets all federal and state EPA drinking water standards. Bottled water must comply with Food and Drug Administration regulations. Most required monitoring under the FDA regulations is not as frequent as the monitoring done on BCWS's water under EPA regulations.

Depending on the source of the water and the treatment process, some bottled waters may contain more or less amounts of substances than tap water. Some studies have shown that microbial growth may occur in bottled water during storage due to the lack of residual disinfectant. BCWS adds chlorine to its system to control microbial growth.

People with compromised immune systems should check the water quality test results for BCWS and the bottled water supplier, and consult their doctor before deciding which source is best for them.

Why did I get a Water System Maintenance Notice "Green Tag" on my door?
When part of the water system has a specified loss in pressure because of a main break or other problem, the Ohio EPA recommends issuing a precautionary boil advisory to all affected customers. It usually takes us about 24-48 hours to fix main breaks and analyze water samples. We will notify you with a new door tag if the advisory continues longer than 48 hours.

How do I get information about pharmaceuticals in drinking water?

How do I get information about water quality?
Water quality standards for safe drinking water are set by the USEPA and Ohio EPA. The water we serve you meets or exceeds all of these requirements.

Our Consumer Confidence Report (CCR) provides a summary of our water testing for the previous year.

If you have other questions about your water quality, please call our Customer Care Department at (513) 887-3066.

Why is there chlorine in the water?

BCWS adds chlorine to the water to ensure the water is free from harmful bacteria. The department has installed several chlorine pump stations throughout our service area. On average there are about 0.6 parts per million of chlorine in our water.

How do I decrease the amount of chlorine in my water (for fish tanks, plant watering, etc.)?
Fill a clean container and leaving it slightly uncovered, allow it to stand overnight. The chlorine will evaporate. To speed up the process, warm the water. Store the dechlorinated water in the refrigerator.

Is there is lead in my water?
BCWS follows EPA regulations and guidelines for water system lead testing. Our tests indicate that, system-wide, the lead levels in BCWS's water are below the EPA limits.

However, lead from your home's plumbing can leach into your water. Lead pipes are easily scratched with a house key, leaving a shiny streak. A private laboratory can test a sample of your water to test for lead.

For more information, see:

- EPA's website
- BCWS's Lead and Copper Fact Sheet

Why is there fluoride in the water?
Fluoride prevents tooth decay and is essential for proper development of bones and teeth. On average there is 1 part per million of fluoride in our drinking water.

What is the hardness level of BCWS's water?
The hardness of the water is usually between 145 and 170 parts per million. This equals 8-9 grains per gallon.

What is the pH level of BCWS's water?
The pH of our water usually ranges between 8.8 and 9.4.

If my water has an odor, what should I do?
Often odors that appear to be coming from running water are coming from the drain. If it seems that your water has a "sewer gas" odor, fill a glass with water and take it to another room. If the water has no odor in the other room, then the odor is probably coming from the drain. Cleaning the drain will usually correct the problem.

Chlorine odors occur when the residual chlorine disinfectant gases (ClO_2) combine with gases given off by common household items. New carpets, paint, flowers, pine wreaths, upholstery, scented soaps and other household products produce gases called VOCs. When the chlorine gas and VOCs combine, you may get a smell that does not smell like either chlorine or the source of the VOC. Some of the most common descriptions of the odors are cat urine, fuel oil or chemicals.

To reduce these odors, try putting a fan in your window to air out your home to reduce the level of VOCs or use a carbon filter to reduce the level of ClO_2.

If you are unable to determine the origin of the odor; please call our Customer Care Department at (513) 887-3066.

Why is my water sometimes rusty?
Rusty or yellow water comes from mineral deposits stirred up during hydrant flushing, fire-fighting, line breaks or maintenance. The local fire department lists scheduled hydrant flushing in the newspaper. Try not to use water during these times to avoid pulling deposits into your home's plumbing.

Rusty water will generally clear up within 2-3 hours after the line is repaired or hydrant closed. You will need to run your cold water for several minutes to flush the rusty water from the lines in your house. Try not to run the hot water because that can deposit rust in your hot water tank.

If your laundry gets stained by rusty water, keep it moist. Buy a rust remover and follow the directions on the package.

Why does my water look cloudy?
Cloudy or milky-looking water is usually caused by dissolved air bubbles in the water. Air bubbles are harmless and are caused by pressure changes, temperature changes, water that is too hot (above 140° F) and faucet aerators. To check for air bubbles, fill a glass container with water: if

the cloudiness is caused by air bubbles, it will clear from the bottom of the container toward the top.

Why are there particles floating in my water?
Black, brown or rusty particles can be caused by minerals breaking loose during hydrant flushing, line breaks or line maintenance. Flush your lines by running the cold water for several minutes. If the water does not clear, the particles could be coming from breakthroughs in your hot water heater or filter system. Call a licensed plumber to investigate the problem.

If white or tan particles are floating on the surface of the water, the problem may be coming from your hot water heater. The plastic dip tubes in water heaters often disintegrate with pieces going through the plumbing and being trapped in faucet aerators. Call a licensed plumber to investigate the problem.

Why is there a pink or black ring in my toilet?
Bacteria, fungus and mold spores normally found in the air can cause rings in your toilet bowl. Wet surfaces provide ideal conditions, and the organisms reproduce rapidly, growing together to form a ring. The color of the ring depends on the species of bacteria, mold or fungus.

You can easily remove the rings with a toilet bowl brush and household cleaners. Close the toilet lid to reduce the number of spores and reduce the light needed for growth.

What causes pinhole leaks?
Scientists have not yet discovered why pinhole leaks occur. National experts currently think that pitting in pipes can start from many factors, including:

- substandard pipe manufacturing
- improper installation
- improper electrical grounding
- excess plumbing flux

For more information, click here

Where can I find more information about drinking water?
EPA publications contain more information about drinking water and your health
http://www.epa.gov/safewater/dwh/index.html

BCWS 130 High Street, Hamilton Ohio 45011 • (513) 887-3066
Board of Commissioners: Gregory V. Jolivette, Charles R. Furmon, Donald L. Dixon
Website designed by Vision Internet

BUFFALO WATER
operated by VEOLIA WATER

Water Quality

My water appears milky, cloudy or white, when poured in a glass it clears from bottom to top, is it safe to drink?

Yes, your water is safe to drink. The cloudiness is simply air. Air-bound water is most frequently seen when the water temperature is colder than the ambient air. This effect may be enhanced when an aerator is attached to the faucet's tap. The presence of air-bound water is not harmful and no action needs to be taken to correct this phenomenon.

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Why does my water appear brown or orange, when it is not used for a while?

This is probably due to rust within your internal plumbing at your residence. We suggest you let the water run for a few minutes, until it clears, before use.

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Why is our whole neighborhood experiencing brown or orange water coming out of the tap?

Call the water department at 851-4704 or 851-4747. We will check to see if work is being done in your neighborhood. Often, when a nearby hydrant is being used, or vibration from construction activity is occurring, the flow of water in the main is upset or interrupted. This may cause minerals deposited on the walls of the main, to detach and become suspended in the water.

We suggest that you, and your neighbors, run the water for a time. The greater the water usage in your area, the faster the minerals deposited in your water will clear. If possible, run the water from the cold-water tap closest to your water meter. This may prevent these minerals from traveling to other faucets farther along your water pipes. Once the water clears, it may be necessary to remove, and clean any aerators that are attached to you faucets.

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[redacted]

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What are the particles that are clogging my aerator, dishwasher hoses, etc.?

Let's do a quick test to see what these particles are. Collect some of these particles and place them in a small cup. Slowly and carefully pour a small amount of household vinegar in this cup. If these particles dissolve in the vinegar, they are probably mineral deposits. It is quite natural

to see small amounts of minerals coming from your water pipes.
But if the particles do not dissolve in vinegar, they may be plastic coming from the "dip tube" in your hot water tank. This broken down "dip tube" material closely resembles mineral deposits, but are much more abundant. When the plastic "dip tube" in a hot water tank begins to disintegrate it may wreak havoc in your plumbing. You will eventually notice a loss of hot water pressure, along with blocked aerators and hoses. The "dip tube" or perhaps the entire hot water tank may need to be replaced.
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I have a skin rash, is the water to blame?

You may have dry skin, or any number of different skin ailments (e.g. eczema), that become irritated when in contact with water. Water does not create these ailments, but the ailments may become worse when it comes in contact with water because instead of hydrating the skin, water may draw moisture away from your skin. Talk to your doctor or pharmacist regarding a remedy.
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Why does my water taste and smell like algae, or grass or dirt?

During the end of summer through fall you may notice a foul taste and odor in your water. This is an after taste do to the presence of algae in Lake Erie. We do remove, filter and disinfect algae in the production of finished water, but often the aftertaste will remain (see Aesthetic Qualities for details). Despite the taste & odor, your water is perfectly safe to consume. We suggest you place a container of water in your refrigerator. The colder the water, the less noticeable the taste.
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Why did all my fish die, after I put fresh water in my aquarium?

Tap water contains residual chlorine to keep it disinfected. This residual chlorine is deadly to fish. Before adding tap water to a fish tank it is necessary to dechlorinate the water. This can be achieved by adding a dechlorination agent, available at any pet supply store. You can also collect a quantity of water in an open container, and allow the chlorine to dissipate naturally.
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Why does my water smell like bleach?

This is a normal smell when using tap water. We add chlorine to water to keep it disinfected. At certain times of the year the chlorine smell is more noticeable. This is especially apparent when the water temperature is warmer than air temperature.
Chorine, like all gases, will travel from a warm environment to a colder one. This phenomenon is the driving force of lake effect snow as well as chlorine gas in water.
If you find the chlorine smell objectionable, try placing a container of water in your refrigerator overnight. The chlorine will escape and the chlorine odor will be gone. This water should be kept in your refrigerator because it will no longer have chlorine in it to keep it disinfected.
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Lake Josephine

Site Profile and Proposal

Contact Information

Customer / Utility:	Lake Josephine	Date:	1/6/2010
Site or Well Identity / Location:	Canary Way	Site Contact:	Johnny Chamberlin
Local Engineer / Firm:	Tricia Williams	Contact Phone:	941-915-7688
Other Pertinent Notes:		Rep Contact:	Tricia Williams
Operator:	Johnny Chamberlin	Fax:	352-787-6333
Target Date for Installation:	2010	Email:	prwilliams@aquaamerica.com
Treatment Goals or Target Parameters:	Hydrogen Sulfur		

System Parameters / Site Specific Info

System Type / Application:	Subdivision	(utility, school, MHP, other)
Population Served:	1250	(estimated)
Number of Connections:	536	
Number of Wells to be treated:	2	(# wells to be treated)
Design Flow (GPM):	222	(Max design flow rate)
Ave Flow (GPM):	65	(Typical demand)
Adedge Sizing Basis (max GPM):	0	(Sizing Basis - Adedge)
Gallons per day:	93,800	(Avg throughput per day)
Est. Usage (Gals / Year):	34,237,000	(Best estimate)
Existing Pretreatment or disinfection:	Sodium Hypochlorite	
Equipment available for offloading:		
Pump Operation / Pressure:	45-65 psi	
Electrical Power Availability:		
Atm Storage Tank Present / Size:	17,000 gal	
Hydropneumatic Tank Present / Size:	3,000 gal	
Building present/ available space:		
Any additives ie, phosphates, fluoride:	Flouride	
Discharge Options available:	Lake Josephine Store and Haul	

Site Specific Notes

Site Shipping Address
Canary Way
Sebring, FL
33875

Water Analysis

Project Specific Parameters	Codes		Parameters		Codes		Parameters	
	All	pH	7.67	units	All	Total Org. Carbon	2.9	mg/L TOC
	1, 2	Total As		mg/L As	All	Sulfate	28.0	mg/L as SO4
	1, 2	As(III)		mg/L (if known)	4, 5	Nitrates	0.03	mg/L as NO3
	All	Sulfides		mg/L	4, 5	Chlorides	33.0	mg/L Cl
Codes: 1 = Arsenic project	All	Hardness	185.0	mg/L @ CaCO3	4	Boron		mg/L B
2 = Arsenic, Iron / Mn / S project	All	Alkalinity	170.0	mg/L @ CaCO3	4	Gross Alpha	11.0	pCi/L
3 = Fluoride project	All	Silica		mg/L SiO2	3, 4, 5	TDS:	286	mg/L
4 = Uranium, Radium project	All	Phosphate		mg/L P04	3	Fluoride	0.15	mg/L F
5 = Nitrate project	3, 4, 5	Bicarbonate	0.60	mg/L HCO3	All	Turbidity	1.2	NTU
6 = General Filtration	All	Iron	0.04	mg/L Fe	All	Suspended Solids	238	mg/L TSS
7 = Other	All	Manganese	0.03	mg/L Mn	All	Temperature		degrees F

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Leisure Lakes — Site Profile and Proposal

Contact Information

Customer / Utility:	Leisure Lakes	Date:	1/6/2010
Site or Well Identity / Location:	101 Park View Cir. S	Site Contact:	Johnny Chamberlin
Local Engineer / Firm:	Tricia Williams	Contact Phone:	941-915-7688
Other Pertinent Notes:		Rep Contact:	Tricia Williams
Operator:	Johnny Chamberlin	Fax:	352-787-6333
Target Date for Installation:	2010	Email:	prwillams@aquaamerica.com
Treatment Goals or Target Parameters:	Hydrogen Sulfur		

System Parameters / Site Specific Info

System Type / Application:	Subdivision	(utility, school, MHP, other)
Population Served:	632	(estimated)
Number of Connections:	276	
Number of Wells to be treated:	2	(# wells to be treated)
Design Flow (GPM):	50	(Max design flow rate)
Ave Flow (GPM):	23	(Typical demand)
Adedge Sizing Basis (max GPM):		(Sizing Basis - Adedge)
Gallons per day:	33,645	(Ave throughput per day)
Est. Usage (Gals / Year):	12,280,425	(Best estimate)
Existing Pretreatment or disinfection:	Gas Cl2	
Equipment available for offloading:		
Pump Operation / Pressure:	45-65 psi	
Electrical Power Availability:	10,000	
Atm Storage Tank Present / Size:		
Hydropneumatic Tank Present / Size:		
Building present/ available space:		
Any additives ie, phosphates, fluoride:	Flouride	
Discharge Options available:	Wastewater Treatment Facility	

Site Specific Notes:

Site Shipping Address:

101 Park View Cir. S
Lake Placid, FL
33852

Water Analysis

Project Specific Parameters	Codes		Parameters		Codes		Parameters	
	All	pH	7.40	units	All	Total Org. Carbon	2.5	mg/L TOC
	1, 2	Total As		mg/L As	All	Sulfate	45.0	mg/L as SO4
	1, 2	As(III)		mg/L (If known)	4, 5	Nitrates	0.12	mg/L as NO3
	All	Sulfides		mg/L	4, 5	Chlorides	37.0	mg/L Cl
Codes: 1 = Arsenic project	All	Hardness	180.0	mg/L @ CaCO3	4	Boron		mg/L B
2 = Arsenic, Iron / Mn / S project	All	Alkalinity	154.0	mg/L @ CaCO3	4	Gross Alpha	2.0	pCi/L
3 = Fluoride project	All	Silica		mg/L SiO2	3, 4, 5	TDS:	298	mg/L
4 = Uranium, Radium project	All	Phosphate		mg/L P04	3	Fluoride	0.15	mg/L F
5 = Nitrate project	3, 4, 5	Bicarbonate		mg/L HCO3	All	Turbidity	2.0	NTU
6 = General Filtration	All	Iron	0.170	mg/L Fe	All	Suspended Solids	212	mg/L TSS
7 = Other	All	Manganese	0.005	mg/L Mn	All	Temperature		degrees F

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Sebring Lakes

Site Profile and Proposal

Contact Information

Customer / Utility:	Sebring Lakes	Date:	1/6/2010
Site or Well Identity / Location:	5313 Knight Ave	Site Contact:	Johnny Chamberlin
Local Engineer / Firm:	Tricia Williams	Contact Phone:	941-915-7688
Other Pertinent Notes:		Rep Contact:	Tricia Williams
Operator:	Johnny Chamberlin	Fax:	352-787-6333
Target Date for Installation:	2010	Email:	prwilliams@aquaamerica.com
Treatment Goals or Target Parameters:	Hydrogen Sulfur		

System Parameters / Site Specific Info

System Type / Application:	Subdivision	(utility, school, MHP, other)
Population Served:	298	(estimated)
Number of Connections:	85	
Number of Wells to be treated:	1	(# wells to be treated)
Design Flow (GPM):	194	(Max design flow rate)
Ave Flow (GPM):	48	(Typical demand)
Adedge Sizing Basis (max GPM):	0	(Sizing Basis - Adedge)
Gallons per day:	69,667	(Avg throughput per day)
Est. Usage (Gals / Year):	25,428,455	(Best estimate)
Existing Pretreatment or disinfection:	Sodium Hypochlorite	
Equipment available for offloading:		
Pump Operation / Pressure:	45-65 psi	
Electrical Power Availability:		
Atm Storage Tank Present / Size:	25,000 gal	
Hydropneumatic Tank Present / Size:		
Building present/ available space:		
Any additives ie, phosphates, fluoride:	Flouride	
Discharge Options available:	Sebring Sprayfield (industrial waste permit)	

Site Specific Notes:

Site Shipping Address:

101 Park View Cir. S
Lake Placid, FL
33852

Water Analysis

Project Specific Parameters

Codes:
1 = Arsenic project
2 = Arsenic, Iron / Mn / S project
3 = Fluoride project
4 = Uranium, Radium project
5 = Nitrate project
6 = General Filtration
7 = Other

Codes		Parameters		Codes		Parameters	
All	pH	7.62	units	All	Total Org. Carbon	1.2	mg/L TOC
1, 2	Total As		mg/L As	All	Sulfate	1.7	mg/L as SO4
1, 2	As(III)		mg/L (if known)	4, 5	Nitrates	0.16	mg/L as NO3
All	Sulfides		mg/L	4, 5	Chlorides	41.0	mg/L Cl
All	Hardness	113.0	mg/L @ CaCO3	4	Boron		mg/L B
All	Alkalinity	108.0	mg/L @ CaCO3	4	Gross Alpha	7.1	pCi/L
All	Silica		mg/L SiO2	3, 4, 5	TDS:	346	mg/L
All	Phosphate		mg/L P04	3	Fluoride	0.14	mg/L F
3, 4, 5	Bicarbonate		mg/L HCO3	All	Turbidity	0.24	NTU
All	Iron	0.180	mg/L Fe	All	Suspended Solids	138	mg/L TSS
All	Manganese	0.0036	mg/L Mn	All	Temperature		degrees F

Email or Fax form to: AdEdge Technologies, Inc. * greg@adedgetechnologies.com * PH: 678-835-0052 * FAX: 678-835-0057

Lake Josephine, Leisure Lakes, Rosalie Oaks and Zephyr Shores were all included in Group 4 by the Public Service Commission. This was the highest rates approved. AUF opposed this rate structure. Tangerine was placed in Group 1.

	Calculated Statewide Uniform Rate **No W/W allocation** Max gall factor = 2	Calculated Statewide Uniform Rate **With W/W Alloc** Max gall factor = 2	Lake Josephine Leisure Lakes Rosalie Oaks Zephyr Shores Approved Group 4	Tangerine Approved Group 1	**Aqua Requested**
BFC	$ 14.82	$15.45	$ 15.52	$ 13.92	$ 21.92
1st Tier	$ 4.11	$4.72	$ 6.59	$ 1.97	$ 3.80
2nd Tier	$ 5.13	$5.91	$ 8.24	$ 2.47	$ 4.76
3rd Tier	$ 8.21	$9.45	$ 19.78	$ 5.92	$ 4.76
Bills at:					
3,000 gal	$ 27.14	$ 29.62	$ 35.29	$ 19.83	$ 33.32
5,000 gal	$ [illegible]	[illegible]	[illegible]	[illegible]	[illegible]
10,000 gal	$ 61.01	$ 68.60	$ 89.67	$ 36.12	$ 64.72
Average Usage (7,000 gal)	$ 45.61	$ 50.88	$ 64.95	$ 28.71	$ 50.44

Rate Structure

In an effort to address affordability in its rate case, Aqua proposed a state-wide uniform rate for both water and wastewater. Also, Aqua proposed a two-tier inclining block rate structure for water, with the second block having a factor of 1.25 times the first block. Under its proposed rate structure, customers throughout the state of Florida would have paid approximately $40.92 for water and $88.91 for wastewater for 5,000 gallons. However, the FPSC staff recommended a different rate structure using a grouping of systems. The Commission approved this recommended rate structure which included the most aggressive three-tier inclining block gallonage charges ever approved. The third block begins at 10,000 and has a factor of 3 times the first block. This has caused a great amount of concern on the part of customers throughout the state of Florida. Further, the FPSC created the gallonage charges with 65% of the approved revenue requirement included. Thus, only 35% of the revenue requirement is recovered through the BFC. Finally, the FPSC also took some of the revenue requirement from the wastewater systems and again spread this over the water rates. These three factors taken together, has created very high gallonage charges for Aqua's customers.

EXHIBIT H

Exhibit H

Final Quarterly Environmental Compliance Update

(Report on Warning Letters, Consent Orders and NOVs for the Period October, 2010 through December 2010)

Chuluota WTP – The water in the Chuluota region originates in the Floridan aquifer. The water is characteristically difficult to treat for public drinking water purposes due to naturally occurring total organic carbon (TOC) and hydrogen sulfides, which are indigenous in the local water table. As a consequence, residents in the Chuluota area have struggled with water quality issues for more than 30 years.

AUF bought the Chuluota system in 2004 as part of its purchase of Florida Water. Since that time, AUF has collaborated with the FDEP and worked closely with the agency to resolve issues stemming from TOCs and hydrogen sulfides.

In 2009, AUF hired Dr. James Taylor who recommended AUF pilot two treatment systems to address the removal of hydrogen sulfides and TOC. Based on the results of this pilot study, AUF ultimately selected an ion exchange system manufactured by Tonka Water Systems. This system was selected based on its cost effectiveness as well as the effectiveness of the treatment process. The pilot testing showed the process to be very effective in removing both the natural precursors that form TTHMs and the sulfides that contribute to taste and odor in the water. The ion exchange system will not only result in lower TTHMs, it also will reduce the hydrogen sulfide in the well water and improve the taste and odor of the drinking water.

To expedite the construction and meet the consent order timelines, AUF divided the work into two phases. As part of Phase 1, AUF modified the pipe configuration, installed new pumps, and placed into service a 50,000 gallon ground storage tank. The project was designed to add chlorine into the smaller storage tank, reducing the time it has to react with the organics in the water before ammonia is added thereby reducing the formation of TTHMs in the distribution system. Phase 1 was placed in service at the end of February 2010.

Phase 2 consisted of the installation of the ion exchange treatment units and the raw water pipeline from plant 1 to plant 2. Construction began in March 2010. In accordance with the consent order, construction was timely completed with FDEP clearance received June 24, 2010. Thereafter, the new treatment facilities were placed into service.

Once the treatment was optimized, flushing was reduced and the residual disinfection in the distribution system was changed to free chlorine. Sampling shows that the Chuluota water system was in compliance with the TTHM standards for all of 2010.

FDEP closed-out the consent order on December 23, 2010. The closure letter from FDEP is appended as Attachment "1". A follow up inspection by FDEP in January 2011 found no deficiencies. A copy of the inspection report is appended as Attachment "2".

The total cost of the project, including the ion exchange units, the raw water main from plant 1, converting plant 1 to a storage/booster station and all of the modification needed at plant 2 was $2.3 million.

Tomoka View Estates WTP – AUF signed a consent order for this system on December 18, 2009. As indicated in previous reports, AUF completed construction of the Chloramination system which was placed in service in December 2009. The results from the quarterly samples taken from December 2009 to June 2010 and the RAA for the 2nd quarter of 2010 were all well below the TTHM standards AUF has received notification from the Volusia County Health Department that the system has been put on reduced monitoring for TTHMs. The consent order is closed.

Village Water WWTF – Village Water effluent ponds were constructed such that the bottom of the ponds were below ground water table and appear to receive extra ground water associated with the relatively new Polk County Parkway. Pursuant to the consent order, AUF is obligated to identify alternative disposal options for the effluent by May 2011. Before identifying a viable solution, AUF explored a number of potential options including connecting with Polk County and the City of Lakeland for effluent disposal. Although AUF has had multiple meetings with the City of Lakeland and Polk County officials, it could not overcome the political, engineering, high cost challenges of delivering the treated effluent to either entity.

Following those efforts, AUF has now identified a viable solution for effluent reuse and is negotiating an agreement with a nearby property owner. AUF expects the site will acoommodate all of the treated effluent and has drafted a proposed 20 year agreement for the use of the land. AUF has also engaged Andreyev Engineering Inc. to conduct and analyze soil borings and BESH Engineering Inc to design and permit the spray field. AUF anticipates having the spray field operational by November 2011. Meanwhile, AUF has installed monitoring wells around the percolation ponds and is monitoring in accordance with consent Order. To date, that monitoring has revealed no adverse impacts.

Jasmine Lakes WWTF – Three of the four effluent disposal ponds at Jasmine Lakes were constructed prior to the regulations requiring separation from the prevailing ground water table and periodic drying and scarifying. Such ponds are routinely "grandfathered"

under the old regulations. In December of 2002 FDEP began citing the previous owners for the ponds not drying. The previous owners and AUF explored several strategies to dry the ponds, none of which were successful. AUF agreed to dredge the ponds in 2009 to remove accumulated sediment as an alternative to drying and scarifying. A careful review of Rule 62-610.100(9), F.A.C. supported Aqua's position that the ponds were "grandfathered" under the prior rules and thus were not required to be dried. AUF and FDEP have completed extensive hydrogeologic studies of ponds that demonstrate that they are performing as designed. After prolonged negotiations, FDEP and AUF entered into a settlement agreement whereby FDEP has issued a short form consent order. This case is closed. A copy of the FDEP consent order closure letter is appended as Attachment "3".

Palm Terrace WWTF – Similar to the Jasmine Lakes ponds discussed above, the Palm Terrace ponds were constructed around the same time with the same disposal strategies. FDEP initially issued a warning letter asserting that the percolation ponds in this system needed to comply with new FDEP rules. However, a consent order was never issued because FDEP now understands that these ponds were "grandfathered" under the prior rules similar to the Jasmine Lakes matter. As a result, this issue has been resolved and is considered closed.

Subsequently, FDEP has issued a new 5 year permit renewal for operating the WWTP, which included language indicating that this system is "grandfathered", thus remedying the issue identified in the previous warning letter. The newly issued permit includes language that does not require the drying of the ponds. As part of the permit conditions, AUF installed a cross-over pipe between ponds 1 & 2. The two percolation ponds and the spray field are permitted and designed to take the permitted flows from this facility.

Sunny Hills WTP – On December 2, 2010, AUF and FDEP executed a consent order for this system which addresses ground storage capacity, system configuration and other issues. See Attachment "4". When AUF became aware of the issues that prompted the consent order, it retained the services of Hatch Mott McDonald Consulting Engineers ("Hatch Mott") to inspect the tanks for compliance and evaluate the current ground storage capacity. Hatch Mott completed its evaluation, finalized design, and submitted to the FDEP a permit application to interconnect plant 1 and plant 4 with the storage tank. In the event either well is out of service the storage tank will remain in service thus continuing to improve reliability to the customer. The consent order provides that the project is to be completed within 120 days of issuance of permits by FDEP. AUF is complying with all terms and timelines in the consent order. AUF fully expects to complete the storage tank project this year.

While not part of the consent order, as part of AUF's Original Aesthetics Program, it directed Hatch Mott to conduct a pilot sequestering study to determine whether the addition of a sequestering agent to the treatment process will reduce aesthetic concerns

related to iron in the water. The study proved that levels of iron in the water can be sequestered so Hatch Mott prepared a design and permit package for FDEP's approval. AUF received project clearance from FDEP on June 21, 2010. This sequestering treatment is working very well.

Peace River Heights WTP – AUF met with FDEP staff on November 9, 2009 to discuss the warning letter regarding an alleged gross alpha exceedance. Since that meeting, AUF sent split samples to several independent laboratories and had Wisconsin State Laboratory for Hygiene conduct a very thorough analysis of samples from this system. AUF's testing conducted by independent laboratories demonstrated that the original exceedance of the Gross Alpha MCL was an artifact of the analytical method. The system has been in compliance with all radiological limits for all of 2010. However, levels of naturally occurring Combined Radium are close to the MCL. FDEP issued a consent order requiring special bi-monthly sampling for Gross Alpha and Combined Radium for two years. The consent order set a trigger for implementation of treatment if two of twelve individual test results exceeded the trigger. AUF signed the consent order on June 24, 2010.

AUF has been performing the required bi-monthly monitoring while also conducting a pilot study with ion exchange for radium treatment The pilot testing has been completed and demonstrated that the treatment would work if the conditions of the consent order are triggered requiring installation of treatment. AUF is proceeding with preliminary design for treatment so that plans can be filed expeditiously if the trigger is exceeded. Part of the engineering evaluation has been the installation of a flow chart recorder to gather information on system demand to optimize the sizing of treatment, storage and pumps if treatment is needed The bi-monthly sampling began July of 2010 with the results currently not triggering treatment. The bi-monthly sampling is required to continue for two years.

South Seas WWTF – This facility was constructed with four bolted glass-lined steel tanks - one for flow equalization and three for reject water tanks. Because of the very aggressive environment (from the wastewater and salt spray from the Gulf), these tanks had deteriorated in the years since the plant was built. Hurricane Charlie in 2004 also cause substantial damage at the plant and the golf course used for disposal.

AUF made repairs to the tanks on several occasions, and installed disk filters to replace old sand filters and improve the quality of the effluent for reuse.

AUF received a warning letter on February 25, 2010 regarding a leak at the facility's reject storage tanks, which AUF had previously reported to the FDEP. Prior to receiving the warning letter, AUF had already contacted contractors to evaluate the flow equalization tank and the 3 reject storage tanks at the facility. Subsequently, the flow equalization tank failed resulting in a spill of raw wastewater. Aqua had temporary

repairs made to the tank and initiated plans to replace all four tanks. FDEP issued a proposed draft Consent Order to replace the tanks and make other upgrades. That draft consent order has not been finalized, but Aqua has replaced all four storage tanks at a cost of over $400,000.

Jungle Den WTF - This is a consecutive water system that purchases bulk water from St. John's River Utility("SJRU"). SJRU was required to install a new chloramination treatment system and AUF was required to notify customers that it's bulk supplier was moving to a new treatment system. AUF provided that notice to customers after SJRU's new treatment system became operational. In November of 2010 FDEP emailed AUF that it had failed to issued notice before SJRU placed its new system into service. AUF is working with FDEP and expects the agency to issue a short form consent order in the first part of 2011.

Other: Except as set forth herein, as of December 31, 2010 AUF has no NOVs from the FDEP or FDOH, and no new consent orders from those agencies.

Attachment 1

Florida Department of Environmental Protection

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

VIA E-MAIL
jmlihvarcik@aquaamerica.com

Mr. Jack Lihvarcik
Aqua Utilities Florida, Inc.
P.O. Box 2480
Lady Lake, FL 32158-2480

OCD-PW-CE-10-0972

Seminole County - PW
Chuluota Water System
PWS ID # 3590186
Consent Order – OGC Case No. 06-2432
Case Closure

Dear Mr. Lihvarcik:

The above-referenced enforcement case is closed by this office effective December 22, 2010. Department records indicate that the Consent Order requirements have been met. Our records show that the last two quarters of total trihalomethanes (TTHMs) and haloacetic acids (five) (HAA5s), and odor results were below the maximum contaminant levels (MCLs).

Public notice is no longer required, because the running annual average for TTHMs and HAA5s is currently below the MCLs. Please continue to conduct routine (annual) monitoring for TTHMs and HAA5s. The next annual compliance monitoring for TTHMS and HAA5s shall be conducted during **July through September 2011**. Odor sampling shall be conducted during 2012.

Thank you for your cooperation. You may email Nathan Hess at Nathan.Hess@dep.state.fl.us, or contact him by phone at (407) 893-3988, should you have any further questions.

Sincerely,

Christianne C. Ferraro

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

December 23, 2010
Date

CCF/kmd/njh

cc: Tricia Williams, Aqua Utilities Florida Inc. [prwilliams@aquaamerica.com]
Jay Williams, Public Service Commission [jewillia@psc.state.fl.us]
Karl Henry, Seminole County Health Department [karl_henry@doh.state.fl.us]
Lea Crandall, DEP Agency Clerk, DEP Office of General Counsel
Nathan Hess, DEP Drinking Water Compliance and Enforcement

Attachment 2

Florida Department of
Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

VIA E-MAIL
jmlihvarcik@aquaamerica.com

January 28, 2011

Mr. Jack Lihvarcik
Aqua Utilities Florida, Inc.
P.O. Box 2480
Lady Lake, FL 32158-2480

OCD-PW-SS-11-0078

Seminole County – PW
Chuluota Water System
PWS ID Number 3590186

Dear Mr. Lihvarcik:

This confirms a visit to the subject public water system on January 25, 2011, by Nathan Hess to conduct a sanitary survey inspection. A copy of the sanitary survey inspection report is attached for your reference and records.

There were no deficiencies at your water plant at the time of our visit. The overall operation of the water plant was good, which is a credit to both you and your operator. The Department appreciates the excellent work being done on your water system and values your continued spirit of cooperation in complying with Department rules.

If you have any questions, please contact Nathan Hess by e-mail at Nathan.Hess@dep.state.fl.us or by phone at (407) 894-7555, extension 2276.

Sincerely,

Kim Dodson, Program Manager
Drinking Water Compliance and Enforcement

KMD/njh
Attachment

cc: Tricia Williams, Aqua Utilities Florida Inc. [prwilliams@aquaamerica.com]
Jay Williams, Public Service Commission [jewillia@psc.state.fl.us]
Karl Henry, Seminole County Health Department [karl_henry@doh.state.fl.us]
Nathan Hess, DEP Drinking Water Compliance and Enforcement

State of Florida
Department of Environmental Protection
Central District

SANITARY SURVEY REPORT

Plant Name CHULUOTA WATER SYSTEM - WTP 2 County Seminole PWS ID # 3590186-2
Plant Location Brumley Road and Avenue H, Chuluota, FL 32766 Phone 352-266-0608
Owner Name Aqua Utilities Florida Inc. Phone 352-266-0608
Owner Address P.O. Box 2480, Lady Lake, FL 32158-2480
Contact Person Tricia Williams Title Environmental Compliance Phone 352-266-0608
This Survey Date 1/25/11 Last Survey Date 2/26/08 Last Compliance Inspection Date 3/19/10

PWS TYPE: Community

PLANT CATEGORY & CLASS: 4C

MAX-DAY DESIGN CAPACITY: 1,080,000 gpd

PWS STATUS: Approved

TREATMENT PROCESSES IN USE
Iron removal/sequestration, aeration, anion exchange, hypochlorination.

SERVICE AREA CHARACTERISTICS
Subdivision
Food Service: ☐ Yes ☐ No ☒ N/A

Number of Service Connections 1,410
Population Served 3,863 Basis: Operator

OPERATION & MAINTENANCE LOG: Yes
Location Water Treatment Plant
Comments

CERTIFIED OPERATOR: Yes
Operator(s) & Certification Class-Number:
C-6411 William Trendel

Hrs/day: *Required* 1 *Actual* 1
Days/wk: *Required* 5+2 *Actual* 5+2
Non-consecutive Days? ☐ Yes ☐ No ☒ N/A
Comments

MONTHLY OPERATION REPORTS (MORs)
MORs submitted regularly? ☒ Yes ☐ No ☐ N/A
Data missing from MORs? ☒ No ☐ Yes ☐ N/A
Average Day (from MORs) 422,201 gpd
Maximum Day (from MORs) 1,028,000 gpd 08/2010
Comments

Flow Measuring Device Flow Meter
Meter Size & Type 6" McCrometer (each well)
Date Last Calibrated 1/12/10

RAW WATER SOURCE
☒ GROUND; Number of Wells 4
☐ PURCHASED from PWS ID #
☐ Emergency Water Source
Emergency Water Capacity

STANDBY POWER SOURCE: Yes
Source Caterpilar Diesel
Capacity of Standby (kW) 200
Switchover: ☒ Automatic ☐ Manual
Hrs Operated Under Load 4 hr/wk.
What equipment does it operate?
☒ Well Pumps All
☒ High Service Pumps All
☒ Treatment Equipment All
Satisfy avg. daily demand? ☒ Yes ☐ No ☐ Unknown
Audio-visual alarm? ☒ Yes ☐ No
Comments

PLANS AND MAPS

Coliform Sampling Plan	☒ Yes	☐ No	☐ N/A
D/DBP Monitoring Plan	☒ Yes	☐ No	☐ N/A
Lead and Copper Plan	☒ Yes	☐ No	☐ N/A
Distribution System Map	☒ Yes	☐ No	☐ N/A
Emergency Response Plan	☒ Yes	☐ No	☐ N/A

Comments

PREVENTIVE MAINTENANCE/O&M

Operation & Maintenance Manual	☒ Yes	☐ No	
Preventive Maintenance Program	☒ Yes	☐ No	
Flushing Program	☒ Yes	☐ No	☐ N/A
Records	☒ Yes	☐ No	☐ N/A
Isolation Valve Exercise	☒ Yes	☐ No	☐ N/A
Records	☒ Yes	☐ No	☐ N/A

Comments

CROSS CONNECTION CONTROL
BFPAs Unknown # Tested 10
WWTP RPZ Yes Date Tested 10/8/10
Written Plan Yes Date 8/2007
Comments N/A

PWS ID # 3590186-2
Date 1/25/11

GROUND WATER SOURCE

Well Number (Florida Unique Well ID #)		3 (AAH7321)	5	1 (AAH7322)	2 (AAH7323)
Year Drilled		1987	2002	1961	1966
Depth Drilled		218'	250'	240'	235'
Drilling Method		Cable tool	Rotary	Unknown	Unknown
Type of Grout		Unknown	Neat cement	Unknown	Unknown
Static Water Level		30'	31'	Unknown	Unknown
Pumping Water Level		55'	52'	Unknown	Unknown
Design Well Yield		500 gpm	500 gpm	Unknown	Unknown
Test Yield		800 gpm	550 gpm	Unknown	Unknown
Actual Yield (if different than rated capacity)		Unknown	Unknown	Unknown	Unknown
Strainer		Open hole	Open hole	Unknown	Unknown
Length (outside casing)		122'	40'	122'	128'
Diameter (outside casing)		10"	18"	10"	8"
Material (outside casing)		Black steel	Black steel	Black steel	Black steel
Well Contamination History		None	None	None	None
Is inundation of well possible?		No	No	No	No
6' X 6' X 4" Concrete Pad		Yes	Yes	Yes	Yes
SET BACKS	Septic Tank	>200'	N/A	N/A	N/A
	Reuse Water	N/A	N/A	N/A	N/A
	WW Plumbing	>100'	>100'	>100'	>100'
	Other Sanitary Hazard	None observed	None observed	None observed	None observed
PUMP	Type	Vertical turbine	Vertical turbine	Vertical turbine	Vertical turbine
	Manufacturer Name	Flosense	Goulds	Goulds	Goulds
	Model Number	Unknown	Unknown	Unknown	Unknown
	Rated Capacity (gpm)	500	250	500	500
	Motor Horsepower	20	60	Unknown	Unknown
Well casing 12" above grade?		Yes	Yes	Yes	Yes
Well Casing Sanitary Seal		OK	OK	OK	OK
Raw Water Sampling Tap		Yes	Yes	Yes	Yes
Above Ground Check Valve		Yes	Yes	Yes	Yes
Security		Yes	Yes	Yes	Yes
Well Vent Protection		Yes	Yes	Yes	Yes

COMMENTS Wells 1 and 2 are at plant #1 - repump station and feed raw water directly to water treatment plant #2.

PWS ID # 3590186-2
Date 1/25/11

CHLORINATION (Disinfection)
Type: ☐ Gas ☒ Hypo
Make Iwaki (each well) Capacity 5.5 gph
Chlorine Feed Rate 100%
Chlorine Residuals: Plant 2.10 Remote 1.82
Remote tap location 803 Mazurka
DPD Test Kit: ☒ On-site ☒ With operator
Injection Points Transfer from G1 to G2

AERATION (Gases, Fe, & Mn Removal)
Type Cascade - G1 Capacity 650 gpm
Aerator Condition Good
Visible Algae Growth None
Protective Screen Condition Intact
Frequency of Cleaning Quarterly
Date Last Inspected/Cleaned 4th Quarter 2010

AERATION (Gases, Fe, & Mn Removal)
Type Cascade - G2 Capacity 1,300 gpm
Aerator Condition Good
Visible Algae Growth None
Protective Screen Condition Intact
Frequency of Cleaning Quarterly
Date Last Inspected/Cleaned 4th Quarter 2010

IRON REMOVAL/SEQUESTRATION
Make Stenner (2) Capacity 10 gpd
Injection Points: Well discharge piping.
Comments: Orthopolyphosphate

ANION EXCHANGE PROCESS:
Make Tonka Model
Capacity 1.08 MGD
Grade of Salt for Regeneration
Backwash Effluent Destination: Wastewater plant
Comments: Process installed as corrective action for disinfection byproduct formation. Permit 59-0080853-029, cleared 6/24/10.

WATER PLANT PUMPS

Pump Number	Transfer (2)	Backwash (2)
Type	Centrifugal	Centrifugal
Make	Peerless	Peerless
Model	F2-1050	F2-10258
Capacity (gpm)	750	285
Motor HP	30	15
Date Installed	2010	2010

STORAGE FACILITIES
(G) Ground (C) Clearwell (E) Elevated
(B) Bladder (H) Hydropneumatic / flow-through

Tank Type/Number	G1	G2	H1
Capacity (gal)	50,000	300,000	10,000
Material	Concrete	Concrete	Steel
Gravity Drain	Yes	Yes	Yes
By-Pass Piping	Yes	Yes	Yes
Protected Openings	Yes	Yes	Yes
Sight Glass or Level Indicator	Yes	Yes	Yes
PRV/ARV	N/A	N/A	PRV
Pressure Gauge	N/A	N/A	Yes
On/Off Pressure	N/A	N/A	60/80
Access Secured	Yes	Yes	Yes
Access Manhole	Yes	Yes	Yes
Tank Sample Tap Location	Discharge piping	Discharge piping	On tank
Date of Inspection	9/17/08	11/4/10	*
Date of Cleaning	9/17/08	11/4/10	*

Comments: *Tank installed April 2009

HIGH SERVICE PUMPS

Pump Number	1	2	3
Type	Centrifugal	Centrifugal	Centrifugal
Make	Worthington	Worthington	Worthington
Model	3LR9	3LR9	3LR9
Capacity (gpm)	500	500	500
Motor HP	30	30	30
Date Installed	1996	1996	2003

PWS ID # 3590186
Date 1/25/11

PLANT 1 REPUMP STATION

CHLORINATION (Disinfection)
Type: ☐ Gas ☒ Hypo
Make Iwaki (2) Capacity 1.3 gpd
Chlorine Feed Rate 50%
Avg. Amount of Cl_2 gas used N/A
Chlorine Residuals: Plant 1.30 Remote 1.82
Remote tap location 803 Mazurka
DPD Test Kit: ☒ On-site ☒ With operator
☐ None ☐ Not Used Daily
Injection Points Into G1
Booster Pump Info
Comments

IRON REMOVAL/SEQUESTRATION
Make Stenner (2) Capacity 17 gpd
Injection Points Well discharge piping.
Comments

STORAGE FACILITIES
(G) Ground (C) Clearwell (E) Elevated
(B) Bladder (H) Hydropneumatic / flow-through

Tank Type/Number	G1	H1
Capacity (gal)	100,000	10,000
Material	Steel	Steel
Gravity Drain	Yes	Yes
By-Pass Piping	Yes	Yes
Protected Openings	Yes	Yes
Sight Glass or Level Indicator	Yes	Yes
PRV/ARV	N/A	PRV
Pressure Gauge	N/A	Yes
On/Off Pressure	N/A	60/80
Access Secured	Yes	Yes
Access Manhole	Yes	Yes
Tank Sample Tap Location	Discharge piping	On tank
Date of Inspection	10/2009	*
Date of Cleaning	10/2009	*

Comments: *Tank installed April 2009

HIGH SERVICE PUMPS

Pump Number	1	2
Type	Centrifugal	Centrifugal
Make	Goulds	Goulds
Model	Unknown	Unknown
Capacity (gpm)	450	500
Motor HP	25	25
Date Installed	Unknown	Unknown

Comments

PWS ID # 3590186
Date 1/25/11

COMMENTS/REMINDERS:

1. Water treatment plant one is no longer viewed by the Department as an active water treatment plant:

   - Submission of monthly operation reports (MORs) for water treatment plant one and the MOR summation page are no longer required.
   - All point of entry (POE) sampling is to be conducted at the POE for water treatment plant two.
   - Only one maximum residence time (MRT) location is required to be sampled for Stage 1 Disinfectant/Disinfection Byproduct Rule sampling.

2. Water Treatment plant two has been approved for four log virus removal/inactivation. Beginning with the February 2011 MOR, CT calculations will be required. Failure to meet the required CT for more than four hours will result in a treatment technique violation.

Inspector _____ Title Env. Supervisor II Date 1/26/11

Approved by _____ Title Environmental Manager Date 1/28/11

Attachment 3

Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

September 10, 2010

Certified Mail No.: 7010 1670 000 0770 0756
RETURN RECEIPT REQUESTED

Mr. Jack Lihvarcik, President
Aqua Utilities Florida, Inc.
P. O. Box 490310
Leesburg, FL 34749-0310
jmlihvarcik@aquaamerica.com

Re: Settlement of Aqua Utilities Florida, Inc.
OGC File No. 07-1021
Jasmine Lake S/D WWTF
Facility ID No. FLA012768
Pasco County

Dear Mr. Lihvarcik:

The Department is in receipt of the $23,000.00 in Department costs and penalties in this matter. Enclosed please find a copy of the executed Consent Order OGC File No. 07-1021 regarding the above-referenced facility

The Department shall, therefore, close the case on this matter. Your efforts to return to compliance are greatly appreciated. Should you have any questions, please contact Frank L. Fulghum III at (813) 632-7600, extension 411, or via e-mail: frank.fulghum@dep.state.fl.us.

Sincerely,

Frank L. Fulghum III
Environmental Specialist
Domestic Wastewater Program

cc: Patricia Williams, Aqua Utilities Fla, Inc., prwilliams@aquaamerica.com
Patrick Farris, Aqua Utilities Fla, Inc., pafarris@aquaamerica.com
Christine Francescani, FDEP, christine.francescani@dep.state.fl.us
Michele Duggan, FDEP, michele.duggan@dep.state.fl.us

Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

August 20, 2010

Mr. Jack Lihvarcik, President
Aqua Utilities Florida, Inc.
P. O. Box 490310
Leesburg, FL 34749-0310

Re: Proposed Settlement of Aqua Utilities Florida, Inc.
OGC File No. 07-1021
Jasmine Lake S/D WWTF
Facility ID No. FLA012768
Pasco County

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 No. WL07-0002DW51SWD, dated March 8, 2007, a copy of which is attached. The Department finds that Aqua Utilities Florida, Inc. was in violation of Florida Rules and Statutes. In order to resolve the matters identified, Aqua Utilities Florida, Inc. is assessed civil penalties in the amount of $21,500.00 for violation of Rules 62-520.400 and 62-601.500(2), Florida Administrative Code, in accordance with Section 403.141(1), Florida Statutes, along with $1,500.00 to reimburse the Department costs, for a total of $23,000.00.

The Department is not assessing civil penalties for violations of Rule 62-600.410(6) or Rule 62-610.523(4), Florida Administrative Code. Pursuant to Rule 62-610.100(9)(b), Florida Administrative Code, the Facility is an "existing installation" since the facility had on file with the Department an approved permit on or before April 5, 1989. Existing installations are not required to comply with Rules 62-610.523(4), (6) and (7), Florida Administrative Code. Furthermore, pursuant to Rule 62-522.200(1), Florida Administrative Code, the Facility is an "existing installation" since the Facility had on file with the Department a complete application for a permit on or before January 1, 1983. Pursuant to Rule 62-522.300(8), Florida Administrative Code, existing installations discharging to Class G-II ground water are exempt from compliance with secondary drinking water standards outside of a zone of discharge obtained by Department permit.

The Department acknowledges that the payment of these civil penalties by Aqua Utilities Florida, Inc. 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 "Ecosystem Management and Restoration Trust Fund". Payment shall be sent to the Department of Environmental Protection, 13051 North Telecom Parkway, Temple Terrace, Florida, 33637-0926, within 30 days of your signing this letter.

Your signing this letter constitutes Aqua Utilities Florida, Inc.'s 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. 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.

If you do not sign and return this letter to the Department at the District address by September 15, 2010, the Department will assume that Aqua Utilities Florida, Inc. is not interested in settling this matter on the above-described terms, and will proceed accordingly. None of Aqua Utilities Florida, Inc.'s rights or substantial interests are determined by this letter unless you sign it and it is filed with the Department Clerk.

Sincerely,

Deborah A. Getzoff
District Director
Southwest District

DAG/mdd

Attachment

FOR THE RESPONDENT:

I, Jack Lihvarcik, hereby accept the terms of the settlement offer identified above.

September 1, 2010
Date

Jack Lihvarcik
President
Aqua Utilities Florida, Inc.

DONE AND ENTERED this 7th day of September, 2010.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Deborah A. Getzoff
Director
Southwest District

Filed, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

9/10/2010
Date

Clerk

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 Department's Consent Order identification number and the county in which the subject matter or activity is located; (b) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; (c) An explanation of how the petitioner's substantial interests will be affected by the Consent Order; (d) A statement of when and how the petitioner received notice of the Consent Order; (e) A statement of all material facts disputed by petitioner, if any; (f) A statement of the specific facts the petitioner contends warrant reversal or modification of the Consent Order; (g) A statement of which rules or statutes the petitioner contends require reversal or modification of the Consent Order; and (h) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes 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

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 8, 2007

Mr. John Lihvarcik, President/COO
Aqua Utilities Florida, Inc.
P. O. Box 490310
Leesburg, FL 34749-0310

Re: Warning Letter No. WL07-0002DW51SWD
Jasmine Lakes WWTF
Facility ID No. FLA012768
Pasco County

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 field inspection conducted on February 22, 2007 and a subsequent file review of the Jasmine Lakes Wastewater Treatment Facility ("Facility") indicates that a violation of Florida Statutes and Rules may exist at the above-referenced facility. Department of Environmental Protection personnel observed the following:

1. The Part IV rapid-rate percolation pond system was not being operated properly. The four percolation ponds were hydraulically loaded to the point that prevents the ponds from functioning as intended. Rule 62-600.410(6), Florida Administrative Code (F.A.C.), provides that all facilities and equipment necessary for the treatment, reuse and disposal of domestic wastewater and domestic wastewater residuals shall be maintained, at a minimum, so as to function as intended.

2. The operator's log indicated that two of the four percolation ponds had not received any effluent over the past 12 months, yet both ponds remained wet. Rule 62-610.523 (4), F.A.C., provides that hydraulic loading periods of one to seven days, with resting periods of five to 14 days to dry the ponds are required.

3. Ground water monitoring data submitted from the first quarter 2005 through the fourth quarter 2006 indicated that compliance well limit values were exceeded for sodium, in MWC-02, from the third quarter 2005 through the fourth quarter 2006 and for chloride in the fourth quarter 2005 and third quarter 2006. In addition, MWC-02 exceeded the ammonia value in the fourth quarter 2006. Rule 62-520.400, F.A.C., provides that ground water minimum criteria shall be met within the zone of discharge.

4. Ground water monitoring data submitted from the first quarter 2005 through the fourth quarter 2006 indicated that compliance well limit values were exceeded for sodium, in MWC-03, in the second and fourth quarters 2005, and the first, second and third quarters 2006 and for chloride in the second and fourth quarters 2005 and third quarter 2006. In addition, MWC-03 exceeded the

/ Southwest District /

DAG/jn

cc: Jerry Nichols, FDEP

Attachment 4

Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

December 2, 2010

BY ELECTRONIC MAIL
PRWilliams@aquaamerica.com

Ms. Patricia Williams,
Utility Engineer
Aqua Utilities Florida, Inc.
P.O. Box 2480
Lady Lake, Florida 32158-2480

Dear Ms. Williams:

Enclosed, please find a copy of the executed Consent Order (OGC File No. 10-2288-67-PW) aimed at addressing a storage capacity shortage and other violations noted for the Sunny Hills Utilities public water system (PWS ID No. 1670647) in Washington County.

Please note the timelines for corrective actions contained within the document. Also, please forward your payment for penalties and Department costs within 30 days as directed in the Order.

Thank you for your assistance in this matter. For questions, please contact David Hines, Potable Water Enforcement, at (850) 595-0593, or by email at david.hines@dep.state.fl.us.

Sincerely,

Kenneth W. Prest, Jr.
District Director

KWP/dh
Enclosure

c: Harry Householder, Area Manager, Aqua Utilities Florida (hhouseholder@aquaamerica.com)
Paul Thompson, Aqua Utilities Florida (PDThompson@aquaamerica.com)
FDEP NW District Panama City Office
Lea Crandall, FDEP Office of General Counsel (lea.crandall@dep.state.fl.us)

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	)	IN THE OFFICE OF THE NORTHWEST DISTRICT
vs.	)	OGC FILE NO. 10-2288-67-PW
Aqua Utilities Florida, Inc. (Respondent)	)	

CONSENT ORDER

This Consent Order ("Order") is entered into between the State of Florida Department of Environmental Protection ("Department") and Aqua Utilities Florida, Inc. ("Respondent") to reach settlement of certain matters at issue between the Department and Respondent.

The Department finds and Respondent admits the following:

1. The Department is the administrative agency of the State of Florida having the power and duty to protect Florida's water resources and to administer and enforce the provisions of the Florida Safe Drinking Water Act, Sections 403.850, et seq., Florida Statutes ("F.S."), and the rules promulgated and authorized in Title 62, Florida Administrative Code ("F.A.C."). The Department has jurisdiction over the matters addressed in this Order.

2. Respondent is a person within the meaning of Section 403.852(5), F.S.

3. Respondent is the owner and operator of a community water system, Sunny Hills Utilities (PWS ID No. 1670647), located at 3810 Gables Boulevard, Sunny Hills, Washington County, Florida ("System"). The System is comprised mainly of two groundwater wells (Well 1 and Well 4), which discharge to separate treatment, but which supply a common distribution system ("Well 1/Well 4 System"). Another well (Well 5) and treatment plant also supply a distant portion of the Sunny Hills community via an entirely separate distribution system ("Well 5 System"). The Well 5 System is regulated by the Department under the same PWS ID number as the Well 1/Well 4 System, but is separate from it and is not the subject of this Order.

4. The Department finds that the following violations occurred:

a) Failure to provide a total useful finished-water storage capacity of at least 25 percent of the system's maximum-day water demand as required under Section 62-555.320(19)(a), F.A.C. Contributing to the violation are two factors: 1) insufficient total storage tank volume, and 2) the inability of Well 4 to fill tanks located at Well 1 due to current system configuration;

b) Failure to provide satisfactory results of a 20 sample bacteriological well survey before placing Well 1 into permanent service after having been out of operation for more than six months, as required under Section 62-555. 315(6)(b), F.A.C.;

c) Failure to perform routine and nitrate/nitrite monitoring and raw bacteriological monitoring of the water produced by Well 1 when it was producing water for public consumption in July 2007 and August 2007, as required under Rules 62-550.500, 62-550.512, and 62-550.518(2), F.A.C..

Having reached a resolution of the matter Respondent and the Department mutually agree and it is

ORDERED:

5. Respondent shall comply with the following corrective actions within the stated time periods:

a) By October 1, 2010, Respondent shall retain the services of a professional engineer, registered in the State of Florida, to evaluate the System and make recommendations that would correct the system configuration in order to allow Well 4 to fill any tanks within the Well 1/Well 4 System, and shall submit an application, along with any required application fees, to the Department for a permit for construction needed to implement the recommendations of the engineer.

b) By February 15, 2011, Respondent shall retain the services of a professional engineer, registered in the State of Florida, to evaluate the System and make recommendations for modifications to the system that would address the storage capacity violation by increasing total Well 1/Well 4 storage capacity to a level which at a minimum

complies with the requirements noted in Rule 62-555.320(19)(a) and (b), F.A.C., and shall submit an application, along with any required application fees, to the Department for a permit for construction needed to implement the recommendations of the engineer.

c) If the Department requires additional information, modifications, or specifications to process the permit applications described in subparagraphs (5)(a) and (5)(b), above, the Department will issue a written request for information ("RFI") to Respondent. Respondent shall submit the requested information in writing to the Department within 15 days of receipt of the request. Respondent shall provide all information requested in any additional RFIs issued by the Department within 15 days of receipt of each request. Within 60 days of the Department's receipt of the applications described in subparagraphs (5)(a) and (5)(b), above, Respondent shall provide all information necessary to complete the application.

d) Within 120 days of issuance of any required permits described in subparagraphs (5)(a) and (5)(b), above, Respondent shall complete the permitted modifications and submit a Certification of Completion for each permit, prepared and sealed by a professional engineer registered in the State of Florida, along with all supporting documentation. Respondent shall not place the system modifications into service until Respondent receives written Department clearance.

6. Within 30 days of the effective date of this Order, Respondent shall pay the Department $2,095.00 in settlement of the regulatory matters addressed in this Order. This amount includes $1,595.00 for civil penalties and $500.00 for costs and expenses incurred by the Department during the investigation of this matter and the preparation and tracking of this Order. The civil penalties are apportioned as follows: $500.00 for violation of Rule 62-555. 315(6)(b), F.A.C.; $500.00 for violation of Rules 62-550.500, 62-550.512, and 62-550.518(2), F.A.C.; and $595.00 for the value of the economic benefit of non-compliance for missed sampling.

7. Respondent agrees to pay the Department stipulated penalties in the amount of $100.00 per day for each and every day Respondent fails to timely comply with any of the requirements of paragraph 5 of this Order. The Department may demand stipulated penalties

at any time after violations occur. Respondent shall pay stipulated penalties owed within 30 days of the Department's issuance of written demand for payment, and shall do so as further described in paragraphs 8 and 9, below. Nothing in this paragraph shall prevent the Department from filing suit to specifically enforce any terms of this Order. Any stipulated penalties assessed under this paragraph shall be in addition to the civil penalties agreed to in paragraph 6 of this Order.

8. Respondent shall make all payments required by this Order by cashier's check or money order. Payment instruments shall be made payable to the "Department of Environmental Protection" and shall include both the OGC number assigned to this Order and the notation "Ecosystem Management and Restoration Trust Fund."

9. Except as otherwise provided, all submittals and payments required by this Order shall be sent to Department of Environmental Protection, Northwest District Office, 160 Governmental Center, Pensacola, Florida 32502-5794.

10. Respondent shall allow all authorized representatives of the Department access to the Facility and the Property at reasonable times for the purpose of determining compliance with the terms of this Order and the rules and statutes administered by the Department.

11. In the event of a sale or conveyance of the Facility or of the Property upon which the Facility is located, if all of the requirements of this Order have not been fully satisfied, Respondent shall, at least 30 days prior to the sale or conveyance of the Facility or Property, (a) notify the Department of such sale or conveyance, (b) provide the name and address of the purchaser, operator, or person(s) in control of the Facility, and (c) provide a copy of this Order with all attachments to the purchaser, operator, or person(s) in control of the Facility. The sale or conveyance of the Facility or the Property does not relieve Respondent of the obligations imposed in this Order.

12. If any event, including administrative or judicial challenges by third parties unrelated to Respondent, occurs which causes delay or the reasonable likelihood of delay in complying with the requirements of this Order, Respondent shall have the burden of proving the delay was or will be caused by circumstances beyond the reasonable control of Respondent

and could not have been or cannot be overcome by Respondent's due diligence. Neither economic circumstances nor the failure of a contractor, subcontractor, materialman, or other agent (collectively referred to as "contractor") to whom responsibility for performance is delegated to meet contractually imposed deadlines shall be considered circumstances beyond the control of Respondent (unless the cause of the contractor's late performance was also beyond the contractor's control). Upon occurrence of an event causing delay, or upon becoming aware of a potential for delay, Respondent shall notify the Department by the next working day and shall, within seven calendar days notify the Department in writing of (a) the anticipated length and cause of the delay, (b) the measures taken or to be taken to prevent or minimize the delay, and (c) the timetable by which Respondent intends to implement these measures. If the parties can agree that the delay or anticipated delay has been or will be caused by circumstances beyond the reasonable control of Respondent, the time for performance hereunder shall be extended. The agreement to extend compliance must identify the provision or provisions extended, the new compliance date or dates, and the additional measures Respondent must take to avoid or minimize the delay, if any. Failure of Respondent to comply with the notice requirements of this paragraph in a timely manner constitutes a waiver of Respondent's right to request an extension of time for compliance for those circumstances.

13. The Department, for and in consideration of the complete and timely performance by Respondent of all the obligations agreed to in this Order, hereby conditionally waives its right to seek judicial imposition of damages or civil penalties for the violations described above up to the date of the filing of this Order. This waiver is conditioned upon Respondent's complete compliance with all of the terms of this Order.

14. This Order is a settlement of the Department's civil and administrative authority arising under Florida law to resolve the matters addressed herein. This Order is not a settlement of any criminal liabilities which may arise under Florida law, nor is it a settlement of any violation which may be prosecuted criminally or civilly under federal law. Entry of this

Order does not relieve Respondent of the need to comply with applicable federal, state, or local laws, rules, or ordinances.

15. The Department hereby expressly reserves the right to initiate appropriate legal action to address any violations of statutes or rules administered by the Department that are not specifically resolved by this Order.

16. Respondent is fully aware that a violation of the terms of this Order may subject Respondent to judicial imposition of damages, civil penalties up to $10,000.00 per day per violation, and criminal penalties.

17. Respondent acknowledges and waives its right to an administrative hearing pursuant to sections 120.569 and 120.57, F.S., on the terms of this Order. Respondent also acknowledges and waives its right to appeal the terms of this Order pursuant to section 120.68, F.S.

18. No modifications of the terms of this Order will be effective until reduced to writing, executed by both Respondent and the Department, and filed with the clerk of the Department.

19. The terms and conditions set forth in this Order may be enforced in a court of competent jurisdiction pursuant to sections 120.69 and 403.121, F.S. Failure to comply with the terms of this Order constitutes a violation of section 403.161(1)(b), F.S.

20. This Consent Order is a final order of the Department pursuant to section 120.52(7), F.S., and it is final and effective on the date filed with the Clerk of the Department unless a Petition for Administrative Hearing is filed in accordance with Chapter 120, F.S. Upon the timely filing of a petition, this Consent Order will not be effective until further order of the Department.

21. Persons who are not parties to this Consent Order, but whose substantial interests are affected by it, have a right to petition for an administrative hearing under sections 120.569 and 120.57, Florida Statutes. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition concerning this Consent Order means that

the Department's final action may be different from the position it has taken in the Consent Order.

The petition for administrative hearing must contain all of the following information:

a) The OGC Number assigned to this Consent Order;

b) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding;

c) An explanation of how the petitioner's substantial interests will be affected by the Consent Order;

d) A statement of when and how the petitioner received notice of the Consent Order;

e) Either a statement of all material facts disputed by the petitioner or a statement that the petitioner does not dispute any material facts;

f) A statement of the specific facts the petitioner contends warrant reversal or modification of the Consent Order;

g) A statement of the rules or statutes the petitioner contends require reversal or modification of the Consent Order; and

h) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Consent Order.

The petition 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 at 160 Governmental Center, Pensacola, Florida 32502-5794. Failure to file a petition within the 21-day period constitutes a person's waiver of the right to request an administrative hearing and to participate as a party to this proceeding under sections 120.569 and 120.57, Florida Statutes. Before the deadline for filing a petition, a person whose substantial interests are affected by this Consent Order may choose to pursue mediation as an

alternative remedy under section 120.573, Florida Statutes. Choosing mediation will not adversely affect such person's right to request an administrative hearing if mediation does not result in a settlement. Additional information about mediation is provided in section 120.573, Florida Statutes and Rule 62-110.106(12), Florida Administrative Code.

22. Rules referenced in this Order are available at http://www.dep.state.fl.us/legal/Rules/rulelistnum.htm.

FOR THE RESPONDENT:

11-19-2010
Date

JOAN M. LIHVARCIK
Print Name

PRESIDENT
Print Title

DONE AND ORDERED this 2nd day of DECEMBER, 2010, in Escambia County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Kenneth W. Prest, Jr.
District Director
Northwest District

Filed, on this date, pursuant to section 120.52, F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

November 02, 2010
Date

Copies furnished to:

Lea Crandall, Agency Clerk
Mail Station 35

EXHIBIT I

Exhibit I

Report on Environmental Issues in Prior Rate Case

Consent Orders

- **Chuluota Water System** - As explained in detail in the Final Report and in the Fourth Quarter Environmental Compliance Update, all obligations under the consent order have been met and FDEP closed out the consent order on December 23, 2010.

- **The Woods Water System** - FDEP issued a consent order closure letter on Jan 14, 2009. (See Attachment "1".)

- **Zephyr Shores Water System** - FDEP issued a consent order closure letter on August 24, 2009. (See Attachment "2".)

- **The Village Water Wastewater System** - As explained in detail in the Fourth Quarter Environmental Compliance Update, AUF was required to identify alternative disposal for the effluent from this facility by May 2011. AUF has already identified a viable solution for effluent reuse and is negotiating an agreement with a nearby property owner. AUF expects the site will accommodate all of the treated effluent and has drafted a proposed 20 year agreement for the use of the land. AUF has already engaged Andreyev Engineering Inc. to conduct and analyze soil borings and BESH Engineering Inc to design and permit a spray field. AUF anticipates having the spray field operational by November 2011. AUF also has installed monitoring wells around the percolation ponds and is monitoring in accordance with the consent order. To date, that monitoring has revealed no adverse impacts.

- **South Seas Wastewater System** - As explained in detail in the Fourth Quarter Environmental Compliance Update, AUF received a warning letter on February 25, 2010 regarding a leak at the facility's reject storage tanks which AUF had previously reported to the FDEP. Prior to the warning letter, AUF had already contacted contractors to evaluate the flow equalization tank and the 3 reject storage tanks at the facility. Subsequently, the flow equalization tank failed resulting in a spill of raw wastewater. AUF had temporary repairs made to the tank and initiated plans to replace all four tanks. A consent order to replace the tanks and make other upgrades has not been finalized. However, AUF has replaced all four storage tanks at a cost of over $400,000. (See photograph appended as Attachment "3".)

Outstanding Warning Letters

- **Pomona Park** - FDEP issued a case closure letter on this matter on April 17, 2009 (See Attachment "4"). The system was inspected on June 16, 2010 and no violations or deficiencies were noted. (See Attachment "5".)

- **Jasmine Lakes** - As explained in detail in the Fourth Quarter Environmental Compliance Update, this matter has been successfully closed.

- **Palm Terrace** - As explained in detail in the Fourth Quarter Environmental Compliance Update, this matter has been successfully closed.

- **Arredondo Farms** - A warning letter was issued June 12, 2008 alleging effluent violations for AUF's wastewater system in Alachua County. It was determined during the permit renewal process that although the facility was permitted at 0.06 mgd its actual design capacity was no more than 0.045 mgd. The facility had been treating 0.044 mgd Annual Average Daily Flow and experienced peak days of 0.56 mgd. FDEP issued a two year permit which gave AUF time to design and construct improvements including a new head works, additional surge capacity, additional aeration volume and two digesters. The construction was completed and FDEP issued a clearance letter on August 27, 2010. (See Attachment "6".) The FDEP consent order closure letter is appended as Attachment "7".

Outstanding Noncompliance Letters

- **Silver Lake Oaks Wastewater System** for alleged effluent violations relating to total dissolved solids, nitrates and fecal coliforms. With adjustments to the air flow, new diffusers, and diligent monitoring, the plant has returned to compliance and the matter is closed.

- **Florida Central Commerce Park** for alleged failure to submit pathogen monitoring results every 5 years for wastewater system in Seminole County. This wastewater system is required to monitor for pathogens and submit results every five years. This is typically completed in the years when the permit renewal application is required. Accordingly, AUF monitored for pathogens and submitted the report with the renewal application. Unfortunately the FDEP permitting section did not make the FDEP compliance section aware that the report had been received. This miscommunication was quickly resolved and the matter is closed.

- **Valencia Terrace Wastewater System** for alleged failure to satisfy requirement to install a new bar screen and splitter box. The new splitter box and bar screen were installed on June 9, 2009. The matter is closed.

- **Morning View Wastewater System** for allegedly not meeting minimum chlorine contact time and 2 reporting deficiencies. Baffles were installed to meet the minimum contact time. The reporting deficiencies arose from a misunderstanding by the operator that was cleared up. The matter is closed. A subsequent inspection letter cited no deficiencies at the plant. (See Attachment "8".)

- **South Seas Wastewater System** for alleged effluent violations. This matter is discussed in the Consent Order section above. Improvements have been completed and the system is currently operating in compliance with effluent limits.

Other

- **Chuluota Wastewater System** - Discharge monitoring reports allegedly showed that average daily flow to the facility had exceeded permitted capacity. FDEP requested additional information from AUF regarding permit application which was filed on December 6, 2007. AUF entered into a reuse agreement with Utilities, Inc. (subsequently acquired by the City of Oviedo) to accept treated wastewater effluent for reuse. AUF submitted plans and specifications to FDEP for the facilities to implement this agreement. FDEP issued a renewed 5-year permit for the Chuluota wastewater system on April 6, 2010. AUF has completed the installation of the reuse main and expects to begin delivering reuse water to the City of Oviedo by March 1, 2011.

Attachment 1

Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

January 14, 2009

Mr. John Lihvarcik, President
Aqua Utilities Florida, Inc.
P.O. Box 490310
Leesburg, FL 34749

Re: Consent Order Closure
The Woods
PWS-ID No. 660-0347
OGC File No. 07-0466-60-PW
Sumter County

Dear Mr. Lihvarcik:

This letter is to notify you that the provisions of the above-referenced Consent Order have been met. The Department, therefore, considers this case closed.

Your continued cooperation to comply with applicable Department regulations is appreciated. If you have any questions, please contact Kim Woodhouse at (813) 632-7600, extension 401. Kim is our new Environmental Specialist (in Drinking Water) for Sumter County.

Sincerely,

Gerald B. Foster
Environmental Manager
Drinking Water Section

GBF/kw/dm

Attachment 2

Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

August 24, 2009

Mr. John M. Lihvarcik, President and COO
Aqua Utilities Florida, Inc.
1100 Thomas Avenue
Leesburg, FL 34748

Re: Consent Order Closure
Zephyr Shores Mobile Home Estates
PWS-ID No. 651-2018
OGC File No. 09-0737-51-PW
Pasco County

Dear Mr. Lihvarcik:

This letter is to notify you that the provisions of the referenced Consent Order have been met, and the Department has received your payment of $500.00. A copy of the Consent Order is enclosed that was executed by the District Director. The Department, therefore, considers this case closed.

Your continued cooperation to comply with applicable Department regulations is appreciated. If you have any questions, please contact Nick Noreika at (813) 632-7600, extension 314.

Sincerely,

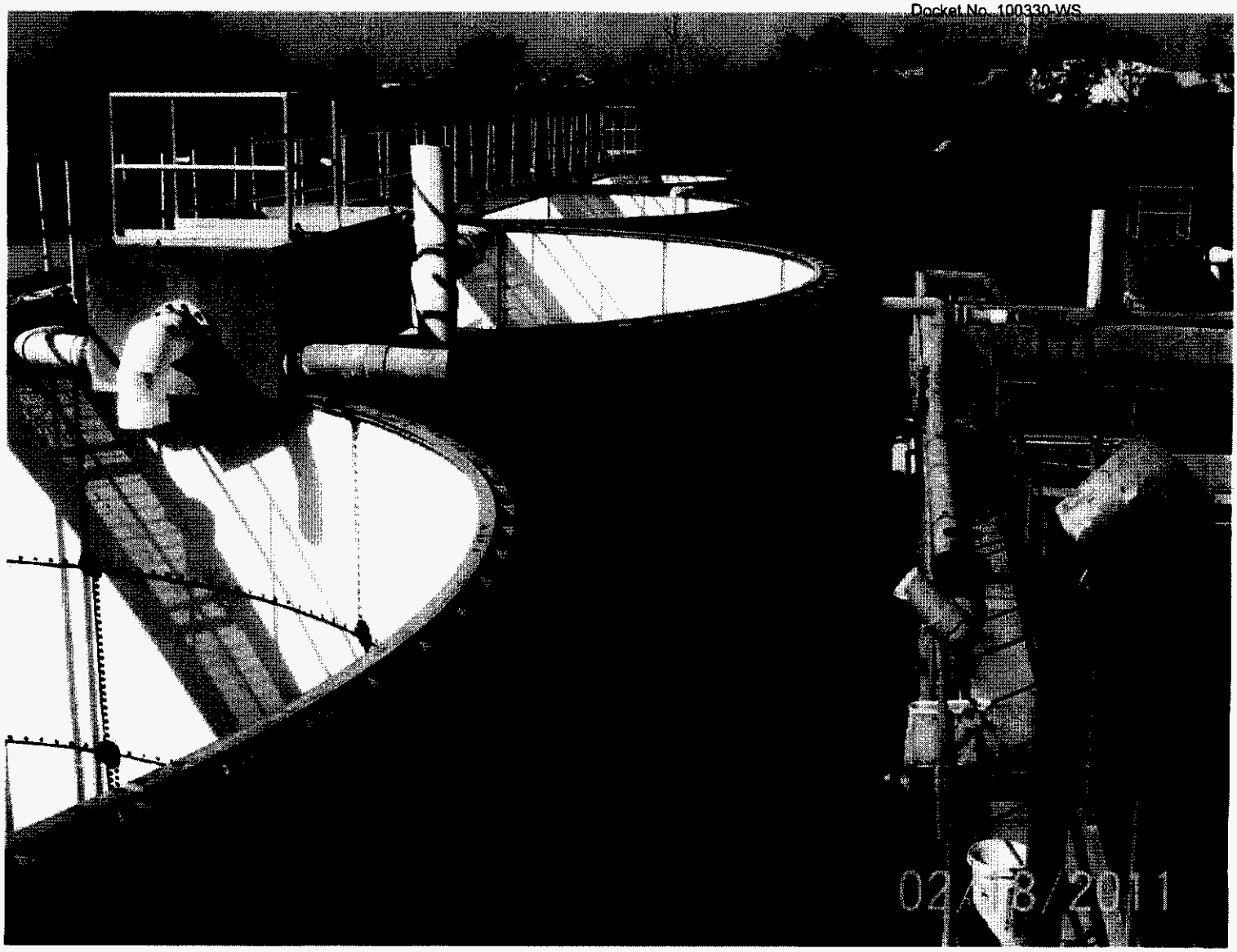
for Gerald B. Foster
Environmental Manager
Drinking Water Section

GBF/nn/dm

Enclosure

cc: Lea Crandall, Agency Clerk, OGC, lea.crandall@dep.state.fl.us

Attachment 3


02/18/2011

Attachment 4

Florida Department of
Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 • Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 17, 2009

SENT BY MAIL

Corporate Service Company
Registered Agent for
Aqua Utilities Florida, Inc.
1201 Hays Street
Tallahassee, FL 32301

Putnam County – Potable Water
OGC File No. 08-2364 – CASE CLOSURE
Pomona Park WTP//PWS ID: 2540905

Dear Registered Agent:

The Department has received the documentation for Items 2(a-i) and the payment of the fine listed in Item 3. The system has now completed all items in the Final Order and the Department considers this case closed. Thank you for your cooperation in resolving this matter.

Should you have any questions concerning the Final Order, please feel free to contact Ben Piltz at (904) 807-3334 or Benjamin.Piltz@dep.state.fl.us. Your continued cooperation is appreciated.

Sincerely,

for Khalid Alvandy

Melissa M. Long, P.E.
Water Facilities Administrator

Enforcement File

cc: Ms. Aliki Moncrief, OGC
Ms. Mary Wilson, OGC
Ms. Ollie Henderson, Data Processing FDEP, NED
Ms. Candice McClure, Aqua Utilities Florida, Inc. (cmmclure@aquaamerica.com)
Ms. Tricia Williams, Aqua Utilities Florida, Inc. (prwilliams@aquaamerica.com)
Mr. Paul Thompson, Aqua Utilities Florida, Inc. (pdthompson@aquaamerica.com)

Attachment 5

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 ♦ Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 2, 2010

SENT VIA MAIL

RECEIVED
JUL - 7 2010
Aqua Utilities
Florida Inc.

Mr. John Lihvarcik, President
Aqua Utilities Florida, Inc.
Post Office Box 490310
Leesburg, FL 34749

Putnam County – Potable Water
Sanitary Survey 2010
Pomona Park WTP // PWS ID: 2540905

Dear Mr. Lihvarcik:

On June 16, 2010, a Sanitary Survey of the above referenced Community water system was conducted with the courteous assistance of Mr. David Haring. The Department is pleased to inform you that the above referenced facility is in compliance with the Florida Safe Drinking Water Act, Sections 403, Florida Statutes (FS), and the rules promulgated thereunder, Florida Administrative Code (FAC) Title 62.

Please note that the Disinfection Byproducts sampled in 2008 was low enough whereby the system was able to reduce to triennial monitoring. Normally, the next set would be due in 2011. Due to the fact that this would put Pomona Park monitoring for Disinfection Byproducts in the same compliance year as Large Community systems, the schedule has been adjusted so that the system should sample in 2012 with the other small community water systems.

As a reminder, this system is required to monitor for the following parameters during 2010: Total Coliform Bacteria with Residual Disinfectant Levels on a monthly basis.

A copy of the Sanitary Survey is enclosed for your records. If you have any questions, please contact me by telephone at (904) 807-3334 or e-mail at Benjamin.Piltz@dep.state.fl.us. Thank you for your cooperation with Florida's Safe Water Drinking Act.

Sincerely,

Ben Piltz

Ben Piltz
Environmental Specialist I

BRR: BLP: bp

cc: Mr. Paul Thompson, Operator, Aqua Utilities Florida via pdthompson@aquaamerica.com

State of Florida
Department of Environmental Protection
~~Central~~Northeast District

SANITARY SURVEY REPORT

Plant Name Pomona Park WTP County Putnam PWS ID # 2540905
Plant Location 110 Church Street, Pomona Park, FL 32181 Phone -
Owner Name Aqua Utilities Florida, Inc. // Mr. John Lihvarcik, President Phone 352-732-6027
Owner Address Post Office Box 490310, Leesburg, FL 34749
Designated Rep. John Lihvarcik Title President Phone 352-732-6027
Facility Contact Mr. Paul Thompson Title Operator Phone 386-937-1143
This Survey Date 6/16/10 Last Survey Date 8/2/07 Last C.I. Date 6/18/09

PWS TYPE & CLASS: Community - (5D)

SERVICE AREA CHARACTERISTICS
Municipality

Food Service: ☐ Yes ☐ No ☒ N/A

GENERAL INFORMATION
Number of Service Connections 192
Population Served 672 Basis Operator
Plant Design Capacity 170,000 gpd
Basis Well capacity
Average Day (from MORs) 29,339 gpd
Max. Day (from MORs) 55,003 gpd
Total Storage Capacity 2,500 gallons
Comments MOR data is based upon the last 12 month average.

LOCATION
Latitude 29° 29' 44.68" North
Longitude 81° 35' 45.27" West
GPS: Yes Date: 7/97
Directions US Hwy 17 south to Main Street in Pomona Park. Turn left on Church Street and the plant is on the left.

OPERATION & MAINTENANCE
Certified Operator: ☒ Yes ☐ No ☐ Not required
Operator(s) & Certification Class-Number
Mr. Paul Thompson

O&M Log: ☒Yes ☐No O&M Manual: ☒Yes ☐No
Operator Visitation Frequency
Hrs/day: *Required* *Actual*
Days/wk: *Required* 3 *Actual* 5
Non-consecutive Days? ☒ Yes ☐ No ☐ N/A
MORs submitted regularly? ☒ Yes ☐ No ☐ N/A
Data missing from MORs? ☒ No ☐ Yes ☐ N/A

RAW WATER SOURCE
☒ GROUND; Number of Wells 2
☐ SURFACE/UDI; Source
☐ PURCHASED from PWS ID #
☐ Emergency Water Source
Emergency Water Capacity

AUXILIARY POWER SOURCE
☒ Yes ☐ None ☐ Not Required
Source Onan Generator
Capacity of Standby (kW) 30
Switchover: ☒ Automatic ☐ Manual
Standby Plan: ☒ Yes ☐ No
Hrs Operated Under Load 4 hr/mo.
What equipment does it operate?
☒ Well pumps
☒ High Service Pumps
☒ Treatment Equipment
Satisfy 1/2 max-day demand? ☒Yes ☐No ☐Unk
Comments Satisfactory

TREATMENT PROCESSES IN USE
Hypochlorination

What additional treatment is needed?
No additional treatment is required.
For control of what deficiencies?
-

DISTRIBUTION SYSTEM
Flow Measuring Device Flow Meter
Meter Size & Type 4" Neptune Meter
Backflow Prevention Devices: ☒ Yes ☐ No
Cross-connections No cross connections observed.
Written Cross-connection Control Program: Yes
Coliform Sampling Plan: ☒ Yes ☐ No
Comments Plans, Manuals, and Logs are kept on site at the plant.

Pomona Park WTP

PWS ID # 2540905
Survey Date 6/16/10

GROUND WATER SOURCE

Well Number (PWS Identification)		2540905	2540905	
Well Name (System Identification)		2	3	
Year Drilled		1962	2007	
Depth Drilled		180'	200	
Latitude		29° 29' 44.68" N	29° 29' 44.68" N	
Longitude		81° 35' 45.27" W	81° 35' 45.27" W	
GPS (Y or N) / Date (if applicable)		Y – 7/97	Y- 08/07	
Florida Well ID		AAC1867		
Static Water Level		28'	1' above ground surface	
Actual Yield (if different than rated capacity)		-	-	
Strainer		Unknown	Unknown	
Length (outside casing)		126'	160'	
Diameter (outside casing)		4"	5"	
Material (outside casing)		Steel	Steel	
Well Contamination History		OK	OK	
Is inundation of well possible?		OK	OK	
6' X 6' X 4" Concrete Pad		OK	PL	
SET BACKS	Septic Tank	~150'	~150'	
	Reuse Water	OK	OK	
	WW Plumbing	OK	OK	
	Other Sanitary Hazard	OK	OK	
PUMP	Type	Submersible	Submersible	
	Manufacturer Name	Sta-Rite	Sta-Rite	
	Model Number	Unknown	Unknown	
	Rated Capacity (gpm)	~158	~158	
	Motor Horsepower	5	5	
Well casing 12" above grade?		OK	OK	
Well Casing Sanitary Seal		OK	OK	
Raw Water Sampling Tap		Smooth/downturned	Smooth/downturned	
Above Ground Check Valve		OK	OK	
Fence/Housing		Locked fencing	Locked fence	
Well Vent Protection		OK	OK	

COMMENTS _____

Pomona Park WTP

PWS ID # 2540905
Survey Date 6/16/10

CHLORINATION (Disinfection)

Type: Hypo-Chlorination
Make Stenner Capacity 10 gpd
Chlorine Feed Rate 45%
Avg. Amount of Cl_2 gas used N/A
Chlorine Residuals: Plant - Remote .064
Remote tap location Bacti Sampling Point
DPD Test Kit: ☐ On-site ☒ With operator ☒ None ☐ Not Used Daily
Injection Points Pre hydro tank
Booster Pump Info Booster pumps not installed.
Comments

Chlorine Gas Use Requirements	YES	NO	Comments
Dual System	☐	☐	
Auto-switchover	☐	☐	
Alarms:			
Loss of Cl_2 capability	☐	☐	
Loss of Cl_2 residual	☐	☐	
Cl_2 leak detection	☐	☐	
Scale	☐	☐	
Chained Cylinders	☐	☐	
Reserve Supply	☐	☐	
Adequate Air-pak	☐	☐	
Sign of Leaks	☐	☐	
Fresh Ammonia	☐	☐	
Ventilation	☐	☐	
Room Lighting	☐	☐	
Warning Signs	☐	☐	
Repair Kits	☐	☐	
Fitted Wrench	☐	☐	
Housing/Protection	☐	☐	

AERATION (Gases, Fe, & Mn Removal)

Type _____ Capacity _____
Aerator Condition _____
Bloodworm Presence _____
Visible Algae Growth _____
Protective Screen Condition _____
Comments _____

STORAGE FACILITIES

(B) Bladder (CW) Clearwell (C) Contact (E) Elevated (G) Ground (H) Hydropneumatic (S.C.) See Comments

Tank Type/Number	H		
Capacity (gal)	5,000		
Material	Steel		
Gravity Drain	Yes		
By-pass Piping	Yes		
Pressure Gauge	Yes		
Sight Glass or Level Indicator	S.G.		
Fittings for Sight Glass	Yes		
Protected Openings	N/A		
PRV/ARV	PRV		
On/Off Pressure	60/70		
Access Padlocked	Yes		
Height to Bottom of Elevated Tank	N/A		
Height to Max. Water Level	N/A		
Last Inspection Date (for tanks with access manholes)	2008		

Comments _____

HIGH SERVICE PUMPS

Pump Number			
Type			
Make			
Model			
Capacity (gpm)			
Motor HP			
Date Installed			
Maintenance			

Comments _____

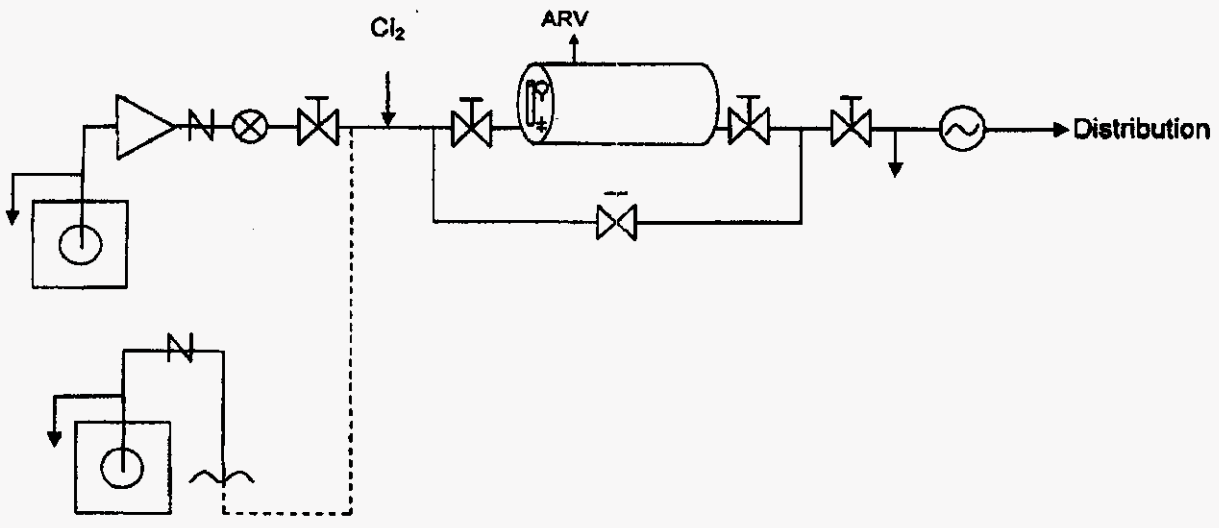
Pomona Park WTP

PWS ID # 2540905
Survey Date 6/16/10

COMPLIANCE MONITORING COMMUNITY PUBLIC WATER SYSTEMS			
CONTAMINANT	**Last Sampled**	**Due Date**	**COMMENTS**
Microbiological (Bacteria)	xxxxxxxx	Monthly	2 distribution samples + 1 from each raw source (distribution number based upon the population served)
Disinfectant Levels	xxxxxxxx	Monthly	2 field readings (i.e. one taken with each microbiological sample that is taken from the distribution system). Only report the quarterly averages of the monthly readings.
Disinfection Byproducts (DBPs)	2008	2012	Total Trihalomethanes (TTHMs) & Haloacetic Acids (HAA5s) taken in accordance with your D/DBPR Monitoring Plan.
Nitrate & Nitrite (as N)	2010	2011	Taken from each Point of Entry to the distribution system (i.e. from each plant's effluent)
Inorganic Contaminants	2009	2012	Taken from each Point of Entry to the distribution system (i.e. from each plant's effluent)
Volatile Organic Contaminants	2009	2012	Taken from each Point of Entry to the distribution system (i.e. from each plant's effluent)
Synthetic Organic Contaminants	2009	2012	Taken from each Point of Entry to the distribution system (i.e. from each plant's effluent). 2 quarterly samples required if >3,300 people served.
Radionuclides	2009	2018	Taken from each Point of Entry to the distribution system (i.e. from each plant's effluent)
Secondary Standards	2009	2012	Taken from each Point of Entry to the distribution system (i.e. from each plant's effluent)
Lead and Copper	2008	2011	Samples taken from pre-approved sample plan sites.
Asbestos	Waiver	2012 / Waiver	Samples taken from distribution. Waiver available if there is no asbestos pipe in the distribution system.

Unless otherwise noted, all samples shall be representative of each source after treatment.

SCHEMATIC (not to scale):



Pomona Park WTP

PWS ID # 2540905
Survey Date 6/16/10

MONITORING VIOLATIONS	MCL VIOLATIONS
No monitoring violations	No MCL violations

DEFICIENCIES:

Inspector Ben Piltz — Ben Piltz — Title Environmental Specialist I — Date 07/02/10

Approved by Blanca R. Rodriguez — Blanca R. Rodriguez — Title Engineer Specialist IV — Date 07/02/10

Attachment 6

Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 • Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 27, 2010

Mr. John M Lihvarcik
President
Aqua Utility Florida Inc
P.O. Box 490310
Leesburg, Florida 34749-310
(941) 907-7400

Re: Alachua County - Wastewater
Certification of Completion
Arredondo Farms Mobile Home Park WWTF - FLA011315

Dear Ms. Lihvarcik:

The Florida Department of Environmental Protection (FDEP) acknowledges receipt of DEP Form 62-620.910(12), Notification of Completion of Construction of:

- Hydrasieve Model 554-2-48 influent static fine screen which is 304 stainless steel traverse bar screen that is 48 inches wide by 54 inches long with 0.060 inches (1.5 mm) openings.
- An 8,500 gallons flow equalization tank. The equalization tank that has one Roots U-RAI 36 blower with a 5 hp motor. The tank also has a duplex pumping system with a capacity of 100 gpm @ 20feet total dynamic head.
- An additional 8,500 gallons aeration basin tank. The tank is set approximately 2 feet above existing tank top elevation.
- A flow splitter box to capture all the flow from aeration basin AT-4 and equally distribute flow between aeration AT-5 and AT-6 and in turn to clarifier 1 and 2. The box has adjustable aluminum weir gates.
- Two 8,500 gallons digester tanks. Aeration and mixing is provided by one Roots U-RAI 36 blower with a 5 hp motor.
- Replacement of existing diffusers with membrane type coarse bubble diffusers and replacement of some deteriorated galvanized steel aeration piping.
- Replacement of the existing outlet baffle and concrete weirs in both existing clarifiers with new outlet baffles and V-notch adjustable aluminum weirs. Remove and replace existing 4 inch return activated sludge airlift in existing clarifiers and replace with 3 inch schedule 40 PVC airlifts and 6 inch PCV gravity return piping to the head of the plant and to the new sludge holding tanks.

There were not significant changes in the design and related materials approved by the Department under Permit Number FLA011305 issued on December 15, 2009. Based on information provided, the Department accepts the project for service. If you have any questions, please contact Joseph Emery at (904) 807-3342 or Joseph.Emery@dep.state.fl.us. Your continued cooperation in our wastewater program is appreciated.

Sincerely,

D. Vo, P.E.
Wastewater Permitting Section

cc:

Mark Bubel, P.E. - Aqua Utility Florida Inc
Patricia Williams, P.E. - Aqua Utility Florida Inc

Attachment 7

Florida Department of
Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 ♦ Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

October 20, 2010

Mr. John M. Lihvarcik, President
Aqua Utilities Florida, Inc.
110 Thomas Avenue
Leesburg, FL 34748

Re: Alachua County - Domestic Wastewater Enforcement
OGC File Number 10-1903
Arredondo Farms MHP – FLA011315

Dear Mr. Lihvarcik:

This letter is to inform you that the above-referenced enforcement project has been closed by the Florida Department of Environmental Protection. All conditions of the Consent Order have been satisfied.

Should you have any questions concerning this Consent Order, please contact Heather Webber at Heather.Webber@dep.state.flu.us or at 904-807-3316. Your cooperation is appreciated.

Sincerely,

TC Kallemeyn

Tom Kallemeyn
Wastewater C & E Supervisor

cc: Paul Thomas, Aqua Utilities
Tricia Williams, Aqua Utilities
Stacie Greco, Alachua County
Ollie Henderson, FDEP – Jacksonville
Diana Thurman, FDEP - Tallahassee
Lea Crandall, Agency Clerk, Mail Station 35

Attachment 8

Florida Department of Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

SENT VIA E-MAIL TO: jmlihvarcik@aquaamerica.com

August 20, 2010

AQUA UTILITIES FLORIDA INC
PO BOX 2480
LADY LAKE FL 32158

OCD-C-WW-10-0624

ATTENTION JOHN LIHVARCIK
PRESIDENT

Lake County - DW
Morningview WWTF
Wastewater Facility - Permit No. FLA010610

Dear Mr. Lihvarcik:

On July 29, 2010, Department personnel conducted a routine inspection of your wastewater facility. At the time of the inspection, the overall operation of your facility was found to be in substantial compliance with the terms and conditions in Permit Number FLA010610. Please review the enclosed inspection report and correct any deficiencies, which have been noted.

Your continued cooperation with our wastewater program is appreciated. If you have any questions, please contact me at (407) 893-3313 or via e-mail: jenny.e.farrell@dep.state.fl.us.

Sincerely,

Jenny E. Farrell

Jenny Farrell
Environmental Specialist
Wastewater Compliance/Enforcement

JF/ar

Enclosure: Inspection Report

cc: Lake County Water Resource Management, scatasus@lakecountyfl.gov
Patrick Farris, Aqua Utilities Inc, pafarris@aquaamerica.com
Edward Pellenz, Aqua Utilities Inc, ejpellenz@aquaamerica.com

8/9/2010 12:06:14 PM

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WASTEWATER COMPLIANCE INSPECTION REPORT

FACILITY AND INSPECTION INFORMATION @ = Optional

Name and Physical Location of Facility	WAFR ID:	County	Entry Date/Time
Morningview WWTF	FLA010610	Lake	7/29/2010 11:45:00 AM
1322 English Road		Phone	@ Exit Date/Time
Leesburg, FL 34749 - 310			7/29/2010 12:08:00 PM

Name(s) of Field Representatives(s)	Title	Email	Phone
Adam Michaelsen	Aqua Utilities Operator		

Name and Address of Permittee or Designated Representative	Title	Phone	@ Operator Certification #
John M Lihvarcik	President		
Aqua Utilities Florida Inc.			
1100 Thomas Avenue	Email		
Leesburg, FL 34749			

Inspection Type	C	E	I	Samples Taken(Y/N): N	@ Sample ID#: N	Samples Split (Y/N): N
X Domestic	_ Industrial			Were Photos Taken(Y/N): N	@ Log book Volume: EIP	@ Page N/A

FACILITY COMPLIANCE AREAS EVALUATED

IC = In Compliance; NC = Out of Compliance; SC = Significant out of Compliance; NA = Not Applicable; NE = Not Evaluated
Significant Non-Compliance Criteria Should be Reviewed when Out of Compliance Ratings Are Given in Areas Marked by a "♦"

	PERMITS/ORDERS		SELF MONITORING PROGRAM		FACILITY OPERATIONS		EFFLUENT/DISPOSAL
IC	1. ♦Permit	NE	3. Laboratory	IC	6. Facility Site Review	IC	9. ♦Effluent Quality
NA	2. ♦Compliance Schedules	NE	4. Sampling	IC	7. Flow Measurement	IC	10. ♦Effluent Disposal
		NC	5. ♦Records & Reports	IC	8. ♦Operation & Maintenance	IC	11. Residuals/Sludge
NA	13. Other:					NA	12. Groundwater

Facility and/or Order Compliance Status:	_ In-Compliance	X Out-Of-Compliance	_ Significant-Out-Of-Compliance

Recommended Actions: Letter

Name(s) and Signature(s) of Inspector(s)	District Office/Phone Number	Date
Jenny Farrell Jenny E. Farrell	CD/ (407)893-3313	08/17/2010
@ Signature of Reviewer	District Office/Phone Number	Date
David Smicherko David Smicherko	CD/ (407)893-3313	August 19, 2010

INSPECTION SUMMARY

Facility Name: Morningview WWTF
Facility ID: FLA010610
Inspection Type: CEI
Date: 7/29/2010 12:08:00 PM

FACILITY BACKGROUND:

Address: 1322 English Road, Leesburg, FL 34749 - 310, Lake County
Permit Information: Wastewater Permit issued: 3/2/2007, and expires: 2/19/2012
Treatment Summary: Extended Aeration Sewage Treatment Plant W/Effluent To A Percolation Pond
Permitted Capacity: 0.02

1. **Permit:** IN COMPLIANCE

   1.1 Observation: A copy of the permit was onsite and available to plant personnel.

2. **Compliance Schedules:** NOT APPLICABLE

3. **Laboratory:** NOT EVALUATED

4. **Sampling:** NOT EVALUATED

5. **Records and Reports: OUT OF COMPLIANCE**

   5.1 Observation: *General* - A copy of the current laboratory certification was available at the time of the inspection (62-620.350(1) F.A.C.).

   Additional Comments: Samples are analyzed by Plant Technicians Laboratory.

   5.2 Observation: *General* - Operators' certifications were current and available on-site.

   5.3 Observation: *General* - The certified operator's daily logbook was complete.

   Additional Comments: The logbook was pre-numbered, bound, and contained sufficient operation/maintenance entries.

   5.4 Observation: *General* - A copy of the Operation and Maintenance Manual as required by Chapter 62-600, F.A.C. was available to plant personnel.

   5.5 Observation: *General* - Please see specific comment

   Additional Comments: The RPZ was last inspected and tested on 4/8/10, according to on-site records.

   5.6 Observation: *General* - Please see specific comment

   Additional Comments: The DMR paperwork review period was from July 2009 through May 2010, **all DMRs were not submitted in a timely manner, see below:**

   The January 2010 DMR was received by the Department on March 1, 2010, this DMR was due on or before February 28, 2010.

   On the August 2009 DMR the number of exceedance column was left blank. Also, the TSS maximum result reported on Part A was 1.0 mg/L and this did not match the result reported on Part B of 6.4 mg/L.

   The influent and effluent annual samples are routinely reported more often than required.

6. **Facility Site Review:** IN COMPLIANCE

   6.1 Observation: *General* - The facility grounds were secured properly.

   6.2 Observation: *Backflow Prevention* - A reduced pressure zone backflow prevention device was in place on the potable water supply line.

   Additional Comments: No leaks or problems were noted.

   6.3 Observation: *LiftStations* - No problems or deficiencies noted.

   Additional Comments: Two liftstations are connected to this system one master located at the plant and then one in the community.

INSPECTION FINDINGS

6.4 Observation: *Headworks* - Please see specific comment

Additional Comments: The liftstation pumps influent directly into the first aeration chamber.

6.5 Observation: *AerationBasins/Act.Sludge* - The contents in the aeration chambers appeared to be adequately mixed.

6.6 Observation: *Blowers/Motors* - The blower was operational at the time of the inspection.

Additional Comments: Two blowers were onsite and covered.

6.7 Observation: *Clarifiers* - Please see specific comment

Additional Comments: The stilling well was good. The clarifier contained pin floc. The skimmer was not on. The weir appeared level, no flow was entering it at the time of inspection.

6.8 Observation: *Disinfection* - Please see specific comment

Additional Comments: Sodium hypochlorite is dripped into the parshall flume area. No flow was passing through at the time of inspection. The chlorine contact chamber contained clear effluent and baffles.

6.9 Observation: *Digesters* - The tank contents in the aerobic digester were well mixed.

Additional Comments: There was room for wasting.

7. **Flow Measurement:** IN COMPLIANCE

7.1 Observation: The copy of the flow calibration report is current and satisfactory.

Additional Comments: This flow meter was last calibrated on January 26, 2010 by Central Florida Controls, Inc.

8. **Operation and Maintenance:** IN COMPLIANCE

8.1 Observation: *General* - Please see specific comment

Additional Comments: The facility grounds were well maintained.

9. **Effluent Quality:** IN COMPLIANCE

9.1 Observation: No exceedances were reported during this DMR review period.

Additional Comments: The DMR review period was from July 2009 through March 2010.

10. **Effluent Disposal:** IN COMPLIANCE

10.1 Observation: *General* - At the time of the inspection, no flow was entering the rapid infiltration basin (RIB).

10.2 Observation: *General* - The RIBs appeared to be well maintained

10.3 Observation: *General* - Advisory signs were posted around the disposal site indicating the nature of the project area.

10.4 Observation: *General* - The fence surrounding the effluent disposal site provided adequate access control (62-610.518(10) F.A.C.)

11. **Residuals/Sludge:** IN COMPLIANCE

11.1 Observation: *General* - Please see specific comment

Additional Comments: Residuals are hauled to 412 Biosolids RMF; sludge was last hauled on July 28, 2010.

12. **Groundwater Quality:** NOT APPLICABLE

13. **Other:** NOT APPLICABLE

Aqua Compliance

Florida 2011 Year-to-date Primary Root Cause Complaint Reasons													
Informals	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Total**
Estimated Bills	0	0	0	0	0	0	0	0	0	0	0	0	**0**
High bill dispute	5	1	4	2	1	1	2	0	0	0	0	0	**16**
**Billing Dispute	11	2	10	3	3	6	5	0	0	0	0	0	**40**
Bill Format	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Termination Notice/non-payment/non-access	0	0	0	0	0	0	1	0	0	0	0	0	**1**
Payment/Credit Processing	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Balance Transfer	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Service Termination	0	2	0	0	0	1	4	0	0	0	0	0	**7**
Denied Payment Arrangements	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Incomplete Work Order	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Wrongful Termination	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Low Pressure	0	0	0	0	1	0	0	0	0	0	0	0	**1**
Denial of Service	0	0	0	0	0	1	0	0	0	0	0	0	**1**
*Poor Service Quality	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Unable to Contact/No return Call	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Property Damage/Maint./Dist.	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Rates	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Water Quality	0	0	1	1	0	0	0	0	0	0	0	0	**2**
Miscellaneous	0	0	0	0	3	0	0	0	0	0	0	0	**3**
Total	**16**	**5**	**15**	**6**	**8**	**9**	**12**	**0**	**0**	**0**	**0**	**0**	**71**

* includes CS complaints involving keying error, Unreasonable PARS, No follow through, Discourteous/Not Helpful
**Includes No bill, incorrect billing info (spelling, addresses), incorrect name on acct, general billing disputes

Aqua Compliance

Florida 2009 Year-to-date Primary Root Cause Complaint Reasons													
Informals	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Estimated Bills	0	0	0	0	0	0	0	0	0	0	0	0	**0**
High bill dispute	2	0	0	9	13	7	6	3	3	6	1	4	**54**
**Billing Dispute	5	9	10	17	15	15	9	13	8	10	3	7	**121**
Bill Format	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Termination Notice/non-payment/non-access	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Payment/Credit Processing	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Balance Transfer	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Service Termination	2	0	0	1	1	1	0	0	0	0	0	3	**8**
Denied Payment Arrangements	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Incomplete Work Order	0	1	0	0	0	0	0	0	0	0	0	0	**1**
Wrongful Termination	0	1	0	0	0	0	0	0	1	0	0	0	**2**
Low Pressure	0	0	1	2	0	0	0	0	0	0	0	1	**4**
Denial of Service	0	0	0	0	0	0	0	0	0	0	0	0	**0**
*Poor Service Quality	0	0	0	0	0	0	1	0	0	0	0	0	**1**
Unable to Contact/No return Call	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Property Damage/Maint./Dist.	0	0	0	2	0	1	1	0	0	0	0	0	**4**
Rates	0	0	0	1	0	0	0	0	0	0	0	0	**1**
Water Quality	0	0	0	0	0	0	1	1	1	1	0	0	**4**
Miscellaneous	3	3	0	1	1	1	0	0	3	0	0	1	**13**
Total	**12**	**14**	**11**	**33**	**30**	**25**	**18**	**17**	**16**	**17**	**4**	**16**	**213**

* includes CS complaints involving keying error, Unreasonable PARS, No follow through, Discourteous/Not Helpful
**Includes No bill, incorrect billing info (spelling, addresses), incorrect name on acct, general billing disputes

Aqua Compliance

Florida 2010 Year-to-date Primary Root Cause Complaint Reasons													
Informals	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Estimated Bills	0	0	0	0	0	0	0	0	0	0	0	0	**0**
High bill dispute	4	3	2	4	4	1	2	7	3	3	4	2	**39**
**Billing Dispute	3	5	7	4	5	10	6	8	3	3	3	2	**59**
Bill Format	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Termination Notice/non-payment/non-access	0	0	1	1	0	0	0	0	0	0	0	0	**2**
Payment/Credit Processing	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Balance Transfer	0	0	0	0	0	0	0	0	1	0	0	0	**1**
Service Termination	3	2	1	1	3	2	0	0	1	1	3	2	**19**
Denied Payment Arrangements	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Incomplete Work Order	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Wrongful Termination	0	0	1	0	0	0	0	0	0	0	0	0	**1**
Low Pressure	0	0	1	0	0	0	0	0	0	0	3	0	**4**
Denial of Service	0	0	0	0	0	0	0	0	0	0	0	0	**0**
*Poor Service Quality	0	1	0	0	0	0	0	0	0	0	0	0	**1**
Unable to Contact/No return Call	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Property Damage/Maint./Dist.	0	2	0	0	0	0	0	0	0	0	0	0	**2**
Rates	2	0	0	0	0	0	0	0	0	0	1	0	**3**
Water Quality	0	0	2	0	0	0	3	0	0	0	0	0	**5**
Miscellaneous	2	1	3	5	1	1	0	0	4	1	3	3	**24**
Total	**14**	**14**	**18**	**15**	**13**	**14**	**11**	**15**	**12**	**8**	**17**	**9**	**160**

* includes CS complaints involving keying error, Unreasonable PARS, No follow through, Discourteous/Not Helpful
**Includes No bill, incorrect billing info (spelling, addresses), incorrect name on acct, general billing disputes