

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water/  
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  
)  
) FILED: September 22, 2011  
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DIRECT TESTIMONY

OF

ANDREW T. WOODCOCK PE, MBA

On Behalf of the Citizens of the State of Florida

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FPSC-COMMISSION CLERK

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1 **I. INTRODUCTION/BACKGROUND/SUMMARY**

2 **Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

3 A. My name is Andrew Woodcock. My business address is 201 East Pine St. Suite 1000,  
4 Orlando, Florida, 32801.

5

6 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

7 A. I am employed by Tetrattech as a Professional Engineer and Senior Project Manager.

8

9 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE?**

10 A. I graduated from the University of Central Florida in 1988 with a B.S. degree in  
11 Environmental Engineering and in 1989 with an M.S. degree in Environmental  
12 Engineering. In 2001, I graduated from Rollins College with an MBA degree. In 1990, I  
13 was hired at Dyer, Riddle, Mills and Precourt as an engineer. In May of 1991, I was hired  
14 at Hartman and Associates, which has since become Tetra Tech. My experience has been  
15 in the planning and design of water and wastewater systems with specific emphasis on  
16 utility valuation, capital planning, utility financing, utility mergers and acquisitions and  
17 cost of service rate studies. I have also served as utility rate regulatory staff for St. Johns  
18 and Collier Counties in engineering matters. Before the Florida Public Service  
19 Commission (FPSC), I have provided testimony for Docket No. 070183-WU, regarding  
20 the Used and Useful Rule for Water Treatment Systems, Docket No. 070293-SU, KW  
21 Resort Utilities Rate Case and Docket No. 100104-WU, Water Management Services,  
22 Inc. Rate Case. In addition, with respect to AUF rate cases I provided testimony before  
23 the FPSC in Dockets 060368-WS and 080121-WS. Exhibit ATW-1 provides additional

1 details of my work experience.

2

3 **Q. WHAT ARE YOUR PROFESSIONAL AFFILIATIONS?**

4 A. I am a member of the Florida Stormwater Association, American Water Works  
5 Association and Water Environment Federation.

6

7 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE A RATE REGULATORY**  
8 **BODY AS AN ENGINEERING WITNESS?**

9 A. Yes, I testified in 2002 for the St. Johns County Regulatory Authority at a special  
10 hearing in an overearnings case against Intercoastal Utilities. In 2008, I testified before  
11 the FPSC on the Used and Useful Rule for Water Treatment Systems on behalf of the  
12 Office of Public Counsel (OPC). Also, in 2008, I testified in Docket 070293-SU  
13 regarding the used and usefulness of utility plant of KW Resort Utilities on behalf of  
14 OPC. I also provided testimony regarding AUF in two previous rate cases, Docket  
15 060368-WS in 2007, which was withdrawn by AUF, and in Docket 080121-WS. In 2010,  
16 I testified before the FPSC in docket 100104-WU regarding used and useful and pro  
17 forma adjustments to rate base for Water Management Services Inc.

18

19 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

20 A. The purpose of my testimony is to offer used and useful (U&U) testimony on the  
21 protested systems of Order No. PSC-11-0256-PAA-WS as shown in Exhibit ATW 2. I  
22 will also provide testimony regarding the pro forma adjustments to rate base and AUF's  
23 compliance history with the Florida Department of Environmental Protection.

24

1 **Q. WHAT DOCUMENTS HAVE YOU REVIEWED AND WHAT**  
2 **INVESTIGATIONS AND ANALYSES HAVE YOU MADE IN PREPARATION**  
3 **FOR YOUR TESTIMONY?**

4 A. I have studied the filings of AUF, including the Minimum Filing Requirements  
5 (MFRs) and the direct Testimony of Troy Rendell and John Livarcik. I have reviewed  
6 and studied many of AUF's responses to discovery requests. Also for purposes of service  
7 area determination, I reviewed the property maps of several County Appraisers offices,  
8 aerial photographs via Google Earth and contacted various utilities around the state.

9 In the summer of 2007, as part of a previous rate filing by AUF, I inspected all of  
10 the systems with the exception of Breeze Hill, Peace River and Fairways. In the summer  
11 of 2008, as part of last rate filing by AUF, I re-inspected Arredondo Farms, Rosalie Oaks  
12 and South Seas among others systems that are not protested in this proceeding.

13 In the winter of 2011, I inspected Arredondo Farms, Breeze Hill, Fairways, Peace River,  
14 Rosalie Oaks and South Seas systems among other systems that are not protested in this  
15 proceeding.

16 I also analyzed the system maps of each system as filed in the MFRs and  
17 reviewed Staff's work papers for U&U.

18

19 **II. USED AND USEFUL CALCULATIONS – GENERAL**

20

21 **Q. WHAT METHODOLOGY DID YOU USE TO CALCULATE THE U&U**  
22 **PERCENTAGES?**

23 A. I made my calculations based upon the requirements of the Commission's Rule 25-  
24 30.4325, F.A.C., for water treatment plant. For wastewater treatment plant, I relied upon

1 Rule 25-30.432, F.A.C. I also relied upon Section 367.081, F.S., which sets forth  
2 standards for U&U determinations. Section 367.081(2)(a)1., F.S., provides in part:

3 The commission shall...fix rates which are just, reasonable, compensatory and not  
4 unfairly discriminatory...In every such proceeding the commission shall  
5 consider...operating expenses incurred...in the operation of all property **used and**  
6 **useful in public service**; and a fair return on investment of the utility property  
7 **used and useful in the public service.**  
8

9 Section 367.081(2)(a)2.a., F.S., provides in part:

10 For purposes of such proceedings, the commission shall consider utility  
11 property...to be used and useful in the public service if:

12 **a. Such property is needed to serve current customers.**  
13

14 In fixing just, reasonable, compensatory and not unfairly discriminatory rates,  
15 Section 367.081, F.S., requires the Commission to provide a fair return on investment in  
16 utility property and recovery of operating expenses incurred in the operation of utility  
17 property which is needed to serve current customers and a statutorily allowed amount of  
18 customer growth, as prescribed by Section 367.081(2)(a) 2.b. and c., F.S. I am of the  
19 opinion that many of the U&U percentages contained in the PAA Order are at odds with  
20 these statutory provisions and result in unnecessarily high rates for the customers.

21 **Q. IN THE COURSE OF PREPARING YOUR TESTIMONY, HAVE YOU**  
22 **CHANGED YOUR OPINION REGARDING THE PROTESTED U&U**  
23 **CALCUATIONS?**

24 A. Yes. Having analyzed the systems in more detail, I have come to an agreement with  
25 the following U&U calculations in the PAA Order that were originally protested by OPC.

26 Water Treatment:

27 Fairways at 100% U&U.

28 Water Distribution:

- 1 Arredondo Farms at 88% U&U,
- 2 Fairways at 100% U&U,
- 3 Lake Josephine/Sebring Lakes at 55% U&U,
- 4 Tomoka at 100% U&U,
- 5 Valencia Terrace at 100% U&U,
- 6 Zephyr Shores at 100% U&U,
- 7 Wastewater Collection:
- 8 Fl Central Commerce Park at 100% U&U, and
- 9 Zephyr Shores at 100% U&U.

10

11 **Q. CAN YOU SUMMARIZE YOUR GENERAL CONCERNS ABOUT THE PAA**  
12 **ORDER'S TREATMENT OF USED AND USEFUL?**

13 A. My primary concerns have to do with reliance on buildout and prior Commission  
14 orders as a justification for higher than calculated U&U percentages. In Exhibit ATW-3,  
15 I present the calculated U&U for AUF and Staff, as well as my own calculations  
16 alongside the U&U used in the PAA Order for the protested systems.

17 In addition, I include a column that identifies the comments that were included in  
18 the PAA Order Attachments. According to the comments provided in the Attachments,  
19 of the 79 protested U&U calculations, "prior order" is relied upon 38 times to justify a  
20 U&U percentage that is higher than what Staff calculated. Also according to the PAA  
21 Order Attachments, buildout is used to justify a 100% U&U for 26 of the 79 protested  
22 U&U calculations.

23 What I see overall from this treatment is a race to increase U&U, with no real  
24 justification for doing so. The only time the U&U percentage changes in the PAA Order



1 is when it increases. I find this to be an inaccurate means to define what portion of the  
2 facilities are actually serving customers. The customers are bearing the full brunt of the  
3 risk associated with stranded capacity in systems with little or no growth, declining  
4 growth rates, and decreasing usage. The end result is higher rates for the customers who  
5 have no control over these factors.

6

7 **Q. CAN YOU TELL US WHY YOU BELIEVE THE U&U SHOULD BE**  
8 **REEVALUATED FOR THE PROTESTED SYSTEMS?**

9 It is my opinion, in order to provide a complete and thorough review of a utility during a  
10 rate case, U&U should be evaluated every time. Over time there are material changes in  
11 the growth of a service area, how the system is operated and in the usage patterns of the  
12 customer base. There also may be new or different information submitted in the MFRs  
13 that corrects inaccurate information from a prior rate case. It is unlikely that the company  
14 would bring such issues to light if it resulted in a decrease in U&U. Therefore, it is  
15 incumbent upon the other parties of the rate case to provide an independent review of  
16 U&U with every rate case. In this case there have been material changes to many of the  
17 systems since the last rate case that effects the U&U calculations.

18 The first change I want to discuss is the system growth. The growth allowance in  
19 the U&U calculation relies upon some projection of historical five year data (usually of  
20 single family homes or Equivalent Residential Connections (“ERCs”)). Since the five  
21 year historical data will change, it is not unreasonable to expect that this growth  
22 allowance will change from rate case to rate case. This will sometimes increase the U&U  
23 and sometimes decrease the U&U; however, the change in system growth should be  
24 evaluated in every rate case and incorporated into the U&U calculation. If not, the

1 customers would be subject to a U&U that is not based upon the most accurate and  
2 definitive information.

3 The U&U established for many systems in Order PSC-09-0385-FOF-WS, which  
4 was the last rate case for most of the protested systems, included an adjustment for  
5 projected growth. Since that time, the Florida and US economy, particularly the housing  
6 market, has undergone a recession. Thus, it is reasonable to assume that these growth  
7 factors are no longer accurate for many of the protested systems. In Exhibit ATW-4, I  
8 present the protested systems and their available U&U growth factors from the 2008  
9 Order and the 2010 staff work papers. Unfortunately, growth factors for 23 of the 79  
10 protested calculations were not available. However, out of the remaining 56 calculations,  
11 where growth factors were available, a total of 23 have experienced a decline in the  
12 growth factor since the last rate case. I believe this change in growth rate to be a  
13 significant part of the U&U calculation and is sufficient justification to reevaluate the  
14 overall U&U of all systems.

15

16 **Q. WHAT OTHER REASONS DO YOU HAVE FOR REEVALUATING THE**  
17 **U&U FOR THE PROTESTED SYSTEMS?**

18 A. I also believe that the fact that the system demand has declined in many cases is also  
19 an important factor for reevaluating the U&U of a system. Rule 25-30.4325 (2), F.A.C.,  
20 which provides guidance on the U&U calculation for water treatment and storage states,  
21 in part:

22 The Commission's used and useful evaluation of water treatment system and  
23 storage facilities will consider...whether flows have decreased due to  
24 conservation or to a reduction in the number of customers.  
25

26 Similarly, for wastewater systems, Rule 25-30.432, F.A.C., which provides guidance on

1 the U&U calculation for wastewater treatment, states in part:

2 In determining the used and useful amount, the Commission will also consider  
3 other factors such as...whether the flows have decreased due to conservation or a  
4 reduction in the number of customers.  
5

6 These rules require that U&U be reevaluated for systems where the flows have decreased.  
7 Historically, Staff has relied upon these rules as a means not to adjust flows down to  
8 generate a U&U that was lower than a previous order. In other words, the U&U  
9 consideration for a decline in flows is zero. I am of the opinion that the consideration for  
10 such reduction in flows should be 100%. Ignoring a decline in system flow does not  
11 effectively capture the portion of the system that is actually serving customers. Capacity  
12 that is not used as a result of a decline in customer usage is not providing service to the  
13 customers and should not be considered in the U&U calculation. Ignoring a decrease in  
14 flows due to customer loss inappropriately shifts the costs of non-U&U facilities onto  
15 customers and leads to unnecessarily higher rates.  
16

17 **Q. WHAT ARE YOUR THOUGHTS ON BUILDOUT AND USING 100% U&U?**

18 A. Rule 25-30.4325 (4), F.A.C., provides:

19 A water treatment system is considered 100 percent used and useful if the service  
20 territory the system is designed to serve is built out and there is no apparent  
21 potential for expansion of the service territory...  
22

23 I believe Staff has stretched the interpretation of this rule beyond its reasonable limits  
24 resulting in determinations of 100% U&U when systems are not actually built out.

25 The rule specifically states that a water treatment system would be 100% if the service  
26 territory the system is designed to serve is built out. Historically, it appears Staff has  
27 assumed that the certificated service area is equivalent to the design service area. This

1 assumption is not supported, however, by any review of the original design criteria of the  
2 treatment facilities. I recognize that given the age of most of the systems in this rate case  
3 obtaining original design calculations would be costly, if they are even available at all.  
4 However, before such a broad assumption of 100% U&U is made for these facilities,  
5 some level of reasonableness against the actual U&U calculations should be considered.  
6 Another portion of Rule 25-30.4325, F.A.C., has to do with the "...and no apparent  
7 potential for expansion of the service territory...". It is important to note that this is a  
8 two part test, both the design service area must be built out AND there must be no  
9 potential for expansion. Before any U&U treatment determination of buildout is made,  
10 the area surrounding the certificated service area must be considered for potential  
11 expansion.

12 If there is undeveloped property contiguous to or in close proximity to the current service  
13 territory that can be served in the future by the stranded capacity, a potential for growth  
14 exists. Under these circumstances, Rule 25-30.4325 (4), F.A.C., precludes such a system  
15 from being considered 100% U&U.

16 **Q. WHAT OTHER CONCERNS DO YOU HAVE WITH DETERMINATIONS OF**  
17 **100% USED AND USEFUL?**

18 A. Occasionally, the Staff has considered older systems with little to no growth over the  
19 previous five years as 100% U&U, or for systems that are 95% U&U, simply rounded  
20 them up to 100%. I have never agreed with this methodology. While Staff has used this  
21 methodology in the past, it is not supported in any U&U rule. Given the recent recession  
22 and down turn in the housing market, many more systems will be experiencing little or no  
23 growth simply as a consequence of factors in the overall state and national economy.  
24 Continuing with this unsupported policy will only result in more systems being

1 considered 100% U&U when, in fact, a portion of the facilities are not providing service  
2 to the customers. This results in higher rate bases and ultimately higher rates for the  
3 customers.

4

5 **III. WATER TREATMENT USED AND USEFUL**

6

7 **Q. WHAT ARE YOUR FINDINGS WITH RESPECT TO WATER TREATMENT**  
8 **USED AND USEFUL FOR THE PROTESTED SYSTEMS?**

9 In ATW-5, I present my U&U analysis of the protested water treatment systems. I  
10 followed the requirements of Rule 25-30.4325, F.A.C. In most cases, I agreed with the  
11 information presented in the MFRs. However, there were a few instances where the  
12 flows as reported in the monthly operating reports (MORs) submitted to FDEP did not  
13 match what was reported in the MFRs. In these cases, I tended to rely upon the MORs,  
14 unless it seemed like the MOR data was an anomaly. In a few other cases, subsequent  
15 discovery changed some of the data I used. Despite my U&U calculations being similar  
16 to AUF's and Staff's, in many cases the U&U that was ultimately included in the PAA  
17 Order was higher.

18

19 **Q. CAN YOU DISCUSS YOUR OPINIONS ON THE U&U OF THE**  
20 **TREATMENT SYSTEMS THAT ARE CONSIDERED BY THE COMMISSION**  
21 **TO BE 100% U&U DUE TO BUILDOUT?**

22 A. Yes, I will start with Arredondo Estates. From Exhibit ATW 3, my calculations agree  
23 with Staff's at setting the U&U for the treatment system at about 80%. However, the  
24 U&U in the PAA Order is set at 100% due to buildout. In order to confirm the buildout, I

1 went to the U&U calculation for the Arredondo Estates distribution system and found  
2 that Staff had calculated the U&U at 46.84%, while I had calculated the U&U at 89.53%.  
3 Now, regardless of the differences in our actual percentages, it is apparent by both sets of  
4 calculations that the Arredondo Estates service area is not built out. In other words, the  
5 requirements of Rule 25-30.4325 (4), F.A.C., have not been met and the system should  
6 not be considered 100% U&U.

7

8 **Q. THE PAA ORDER STATES THAT THE ARREDONDO ESTATES WATER**  
9 **DISTRIBUTION SYSTEM IS 100% U&U AND DOES NOT USE THE STAFF**  
10 **CALCULATION. PLEASE EXPLAIN WHY?**

11 A. The PAA Order assigns a 100% U&U to the water distribution system due to reliance  
12 on a prior order on U&U. I researched the prior order and found that both the water  
13 treatment U&U and the water distribution U&U for Arredondo Estates were considered  
14 100% because the system is old and there was minimal growth over the previous five  
15 years. As I have already testified, this conclusion is not supported by the current U&U  
16 rules and only serves to arbitrarily increase the U&U of utility systems as the impact of  
17 the recession continues to impact growth. Moreover, Staff's own calculations showed  
18 that over 50% of the lots are available for new customers. Therefore, the reliance on the  
19 prior order 100% U&U, which is not supported by the U&U rules, should not be allowed  
20 to support a finding of buildout condition and a 100% U&U for treatment.

21

22 **Q. SO WHAT IS YOUR OPINION OF THE U&U FOR THE ARREDONDO**  
23 **ESTATES TREATMENT?**

24 A. My opinion is that the Arredondo Estates water treatment facilities are 80% which is

1 in agreement with Staff's calculation.

2

3 **Q. WHAT IS YOUR NEXT CONCERN WITH THE WATER TREATMENT**  
4 **U&U?**

5 A. My next concern is with Arredondo Farms. As with Arredondo Estates, my U&U  
6 calculations are in line with Staff's calculations at about 61%. However, the PAA has  
7 100% U&U based on buildout. A review of the water distribution system U&U in the  
8 PAA shows that the U&U for Arredondo Farms is 88%. Despite 12% of the water  
9 distribution system being available for new connections according to the PAA Order,  
10 somehow water treatment U&U of the system was considered built out and therefore  
11 considered 100% U&U. I find this to be completely incongruous and unreasonable. I  
12 recommend that the U&U of the water treatment facilities should be found to be 61%  
13 U&U.

14

15 **Q. WHAT IS YOUR NEXT CONCERN WITH THE WATER TREATMENT**  
16 **U&U?**

17 A. Since we are discussing water treatment facilities that are considered by the PAA to be  
18 100% U&U due to buildout, the next example to consider is East Lake Harris/Friendly  
19 Center. Like the two systems above, Staff's U&U calculations match my own at about  
20 41% U&U, yet the PAA Order sets the U&U at 100% based on buildout. What sets this  
21 system apart from the Arredondo systems is that I agree with staff that the service area is  
22 built out. Nevertheless, referring back to Rule 25-30.4325 (4), F.A.C., both the design  
23 service area must be built out and there must be no potential for service area expansions.  
24 While there is some question as to whether the certificated service area is the design

1 service area, I checked to determine if the existing service area could be expanded.  
2 Exhibit ATW 6 presents an aerial photograph of the service area and the surrounding  
3 properties obtained from Google Earth. Based on this Exhibit, it is apparent that there is  
4 significant developable property adjacent to the service area available for potential  
5 expansion. There also does not appear to be any other utilities in the area that could easily  
6 provide service to this property. Based on my analysis, the second part of the 100%  
7 buildout test has not been met since there is the ability for the utility to expand its service  
8 area. As a result, I am of the opinion that the East Lake Harris/Friendly Center water  
9 treatment facilities should be considered 41% U&U.

10

11 **Q. WHAT IS THE NEXT SYSTEM YOU WISH TO ADDRESS?**

12 A. I found that the following systems appear to meet the requirements of Rule 25-  
13 30.4325 (4), F.A.C., in that they are 100% built out and there is no apparent room for  
14 expansion inside or outside the service territory:

15 Fairways - Treatment U&U 78%;

16 Tomoka - Treatment U&U 43%; and

17 Zephyr Shores- Treatment U&U 25.93%.

18 While I am unable to determine the exact nature of the original design service areas, it  
19 does appear that these facilities are serving an almost completely developed service area.

20 In addition, I have determined that these systems either have no adjacent developable  
21 land (Fairways) or are adjacent to other utility systems (Ormond Beach for Tomoka and  
22 Pasco County for Zephyr Shores). Further, it is likely that these other systems would  
23 provide service to the adjacent undeveloped properties.

24



1 **Q. SO YOUR RECOMMENDATION FOR THESE FACILITIES IS THAT THEY**  
2 **SHOULD BE CONSIDERED 100% U&U PER RULE 25-30.4325 (4), F.A.C.?**

3 A. For the Fairways system, I would agree that 100% U&U may be appropriate. While it  
4 is not 100% U&U, it is more than 75% U&U. In my opinion, that is the low end of  
5 variability between capacity and demand that I would expect in a buildout condition.

6

7 **Q. PLEASE EXPLAIN?**

8 A. I recognize that there are differences that can occur between initial design conditions  
9 and final buildout of a service area. I am of the opinion that a swing of 25% is an  
10 appropriate figure to use to account for incremental sizing of facilities, and differences  
11 between design estimates and actual usages without putting an undue burden on the  
12 customers for capacity that will not be used. So in a case where the service area appears  
13 to be truly built out and there is no apparent opportunity to expand the service, I would  
14 recommend permitting the application of 100% U&U for treatment facilities, provided  
15 that the calculated U&U is greater than 75%.

16

17 **Q. WHAT ABOUT THE TREATMENT FACILITIES WITH A CALCULATED**  
18 **U&U LESS THAN 75%?**

19 A. I find that such a difference goes beyond the expected variability of planning and  
20 design. There could be a number of reasons for this variability. It is possible that the  
21 facilities were originally designed to serve a larger service area than what is certificated,  
22 or the land use within the service area changed from the original concept, or the facilities  
23 could have been over-designed, or the customer base could be requiring far less service  
24 than originally contemplated. In most cases, given the age of these systems it would be

1 difficult to find the specific reason for such a discrepancy. However, the fact remains  
2 that there are large amounts of stranded capacity in these systems that will never be used  
3 by the customers. It is my opinion that this should be addressed in the U&U analysis.  
4 For example, with Zephyr Shores, 74% of the facilities do not provide service to the  
5 customers even though the service area is built out and there is no room for service area  
6 expansion.

7 Therefore, in my opinion, in the Tomoka and Zephyr Shores systems where there  
8 is excessive capacity beyond a reasonably expected variability level, the calculated U&U  
9 percentages should be used.

10

11 **Q. WHAT OTHER COMMENTS DO YOU HAVE ABOUT WATER**  
12 **TREATMENT U&U?**

13 A. Interlachen/Park Manor is similar to Arredondo Farms in that the water distribution  
14 system that the treatment facilities serve is not considered 100% U&U by the PAA Order.  
15 In my opinion, the U&U for this system should be 76%, as calculated by Staff.

16 Hobby Hills is similar to East Lake Harris/Friendly Estates. Although the Hobby  
17 Hills service area is built out, there appears to be developable property adjacent to the  
18 service area that could be served and there are no other utilities nearby that may be able  
19 to provide service (see Exhibit ATW 7). Therefore, it is my opinion that the U&U for the  
20 water treatment facilities for Hobby Hills should remain as calculated by Staff at 41%.

21

22 **Q. WHAT IS YOUR OPINION OF U&U FOR THOSE WATER SYSTEMS THAT**  
23 **RELY UPON A PRIOR ORDER DETERMINATION IN THE PAA ORDER?**

24 A. As I mentioned previously, many systems have experienced changes in either growth

1 rate or system flows from the 2008 rate case that affected the U&U calculation. While  
2 Staff and AUF have adjusted for these changes where the U&U would be adjusted up,  
3 they made no such corrections where the U&U would be adjusted down. I found five  
4 systems in the PAA in which the U&U percentages rely upon the prior order where the  
5 growth rate has dropped. They are as follows:

6 Carlton Village whose U&U growth factor dropped from 1.25 in the 2008 rate case to  
7 1.19;

8 Hobby Hills whose U&U growth factor dropped from 1.04 in the 2008 rate case to 1.00;

9 Lake Josephine/Sebring whose U&U growth factor dropped from 1.06 and 1.25 for the  
10 separate systems in the 2008 rate case to 1.00;

11 Silver Lake Estates whose U&U growth factor dropped from 1.06 in the 2008 rate case to  
12 1.00; and

13 Venetian Village whose U&U growth factor dropped from 1.14 in the 2008 rate case to  
14 1.08.

15 These changes in growth affect the U&U calculation. It is my opinion that the new  
16 calculations for U&U should be used for these systems. For Carlton Village and  
17 Venetian Village, I agree with Staff's calculation of U&U at 91% and 62% respectively. I  
18 have discussed the Hobby Hills system previously in my testimony. For Silver Lake  
19 Estates, my U&U calculation differs from Staff's due to fire flow which I will discuss  
20 later in my testimony. Finally, I address the water treatment U&U for Lake  
21 Josephine/Sebring Lakes later in my testimony.

22 In two systems, Picciola Island and Welaka, the growth rate actually increased  
23 since the last rate case; however, customer usage declined to the extent that the calculated  
24 U&U for this proceeding is less than what was contained in the 2008 rate case. As I have

1 mentioned previously, I am of the opinion that changes in customer flows should be  
2 given full and equal consideration by increasing or decreasing the U&U calculation.  
3 Thus, in my opinion, based on the U&U rule, the U&U for water treatment for these two  
4 systems should be revised to the U&U percentages that both Staff and myself calculated  
5 at 56% U&U for Picciola Island and 74% U&U for Welaka.

6

7 **Q. WHAT IS YOUR RECOMMENDATION FOR THE U&U OF THE**  
8 **REMAINING SYSTEM THAT RELIES UPON A PRIOR ORDER, LAKE**  
9 **JOSEPHINE/SEBRING?**

10 A. The Lake Josephine/Sebring system was handled differently by Staff in this  
11 proceeding than in 2008. In the last rate case, Staff and AUF treated them as separate  
12 systems. In this proceeding, Staff and AUF both treated the systems as interconnected,  
13 which is similar to my methodology in the 2008 rate case. Such a modification  
14 represents a major change in how the system is operated and drastically affects the U&U  
15 calculation. As an interconnected system, there are significant changes to the firm  
16 reliable capacity of the water treatment system which has a direct impact on the  
17 denominator of the U&U calculation. Staff's attempt to try to present a composite U&U  
18 percentage based on the prior order ignores this fundamental change and completely  
19 overstates the U&U of the treatment facilities. Staff's actual calculation of U&U for the  
20 combined system is 32% U&U, as compared to the 85% U&U provided in the PAA  
21 Order.

22

23 **Q. WHAT IS YOUR OPINION OF THE WATER TREATMENT U&U FOR THE**  
24 **LAKE JOSEPHINE/SEBRING SYSTEM?**

1 A. My methodology is similar to Staff's; however, we have a slightly different firm  
2 reliable capacity number. Staff includes the full impact of fire flow in the system  
3 whereas I do not. My opinion of the water treatment U&U for the Lake  
4 Josephine/Sebring system is 25%.

5

6 **Q. YOU HAVE TWICE MENTIONED FIRE FLOW AS HAVING AN IMPACT**  
7 **ON YOUR CALCULATIONS AS COMPARED TO STAFF'S. WILL YOU**  
8 **EXPLAIN?**

9 A. Rule 25-30.4325, F.A.C., allows for fire flow to be included in the U&U calculation  
10 for water treatment, if it is provided. Historically, it has been Staff's position that fire  
11 flow should be included in the U&U calculation if hydrants are included in the service  
12 area regardless of the number of hydrants or ability of the lines to actually provide fire  
13 service to the entire service area. Staff maintains the same position in this proceeding.  
14 Conversely, in my testimony in previous cases, I have argued against including fire flow  
15 in the water treatment U&U calculation if there are not sufficient hydrants in the system  
16 to provide complete coverage or the lines are undersized to provide fire flow. My  
17 reasoning is that, if all customers do not benefit from the provision of fire flow, the  
18 capacity cannot be said to be used and useful for all customers. This issue affects the  
19 water treatment U&U for two systems, Silver Lake Oaks and Lake Josephine/Sebring  
20 Lakes, and is the primary difference between my and Staff's calculations. As a result, my  
21 opinion of U&U for the water treatment facilities for Silver Lake Oaks is 74% versus  
22 Staff's 77%, and my opinion for the Lake Josephine/Sebring system is 25% versus Staff's  
23 32%.

24

1 **Q. WHY ARE SOME OF THE ONE-WELL SYSTEMS PROTESTED WHEN**  
2 **RULE 25-30.4325, F.A.C., STATES THAT SYSTEMS WITH ONE WELL ARE**  
3 **CONSIDERED 100% U&U?**

4 A. Similar to my position in the 2008 rate case, I found that even though some systems  
5 were served by a single well, the calculated U&U numbers are quite low. In these  
6 instances, I am of the opinion that, pursuant to Rule 25-4325 (3), F.A.C., an alternative  
7 approach to U&U is necessary. In defining my criteria for further consideration, I looked  
8 at both the calculated U&U and the size of the supply well. If the well is greater than 150  
9 gallons per minute (“gpm”) and the calculated U&U is less than 75%, I believe further  
10 evaluation of the U&U is appropriate.

11

12 **Q. HOW DID YOU DETERMINE THESE CRITERIA?**

13 In deviating from the requirements of the one well rule, I wanted to be sure that I was  
14 only considering systems where a further analysis would have a significant impact. I  
15 generated these criteria to provide a conservative basis for isolating special cases to the  
16 one well rule. For the U&U criterion, I wanted to make sure that I was not including  
17 facilities that would be close to 100% U&U without consideration of the one well rule. I  
18 set 75% U&U as a threshold so that there would be a significant difference for deviating  
19 from the one well rule.

20 With respect to the well pumps, I wanted to conservatively eliminate smaller  
21 capacity pumps where a small change in demand could have a large percentage impact on  
22 U&U. This recognizes the fact that a smaller well pump could easily approach 100%  
23 U&U with only a few additional customers. Whereas, a larger well serving the same  
24 customer base would not see as high of a U&U increase. Based on my review of the

1 systems, I believe that 150 gpm is a conservative threshold to account for this.

2

3 **Q. WHAT SYSTEMS WERE AFFECTED BY THESE CRITERIA?**

4 A. I found four systems with one well that meet the above criteria and should be  
5 evaluated for U&U on a calculated basis. The systems are as follows:

6 the Breeze Hill system which has a single 177 gpm pump and a calculated U&U of  
7 26%;

8 the Fern Terrace system which has a single 180 gpm pump and a calculated U&U of  
9 68%;

10 the Rosalie Oaks system which has a single well of 250 gpm and a calculated U&U of  
11 12%; and

12 the Twin Rivers system which has a single well of 268 gpm and a calculated U&U of  
13 24%.

14

15 **IV. WASTEWATER TREATMENT USED AND USEFUL**

16

17 **Q. DESCRIBE YOUR USED AND USEFUL METHODOLOGY FOR**  
18 **WASTEWATER TREATMENT SYSTEMS?**

19 A. I followed the methodology stated in Rule 25-30.432, F.A.C. My analysis consisted  
20 of a review of the test year Discharge Monitoring Reports (DMRs) that are required to be  
21 filed monthly with FDEP. For some systems, I found that the DMR flows do not match  
22 with what is found in the MFRs. However, in most cases, it did not appear to be a  
23 significant difference. In my calculations, I used the flows that were presented in the  
24 DMRs.

1 The appropriate basis for the calculation was then determined from the system  
2 permits. In instances where the permit delineated two permitted capacities, one for  
3 treatment and one for effluent disposal, two separate used and useful percentages were  
4 produced. For these cases, I used the larger of the two used and useful values. Exhibit  
5 ATW-8 provides my wastewater treatment used and useful calculations.

6

7 **Q. WHAT IS YOUR OPINION OF THE WASTEWATER TREATMENT U&U**  
8 **FOR THE PROTESTED SYSTEMS?**

9 A. I disagree with the reliance upon buildout conditions and prior orders that show a  
10 higher than calculated U&U. I recommend that the actual calculated U&U percentages  
11 be relied on for rate setting. I think it is important to note that in some cases I agree with  
12 both Staff's and AUF's percentages, and in some cases, my U&U is higher.

13

14 **Q. CAN YOU SHOW SOME EXAMPLES WHERE RELIANCE ON BUILDOUT**  
15 **CONDITIONS OVERSTATES THE WASTEWATER TREATMENT U&U?**

16 A. The first system I want to discuss is The Woods. Staff calculates the wastewater  
17 treatment U&U at 75%, but, the PAA Order recommends 100% due to buildout.  
18 However, the wastewater collection system for the Woods is shown in the PAA as only  
19 71% built out. So there are available lots for new growth in the system and it is clearly  
20 not built out; therefore, the wastewater treatment U&U should be as calculated at 61%.

21

22 **Q. WHAT OTHER EXAMPLES DO YOU HAVE?**

23 A. The next examples I would cite are systems where the treatment U&U is considered  
24 100% when the wastewater collection system is deemed to be 100% U&U, even though



1 the actual collection system calculations support a lower U&U percentage.

2 The Peace River system is considered to have a 100% U&U collection system  
3 even though the actual calculations show that it is 80%. Nevertheless, the wastewater  
4 treatment plant is considered 100% U&U due to buildout, when the actual calculations  
5 show that it is only 59% U&U.

6 The Jungle Den wastewater collection system is considered 100% U&U, when the  
7 actual calculations show that it is 87% U&U by my calculations, and 141% by Staff.  
8 Despite our differences in U&U percentage, which is likely the result of how staff  
9 counted connections in the service area, there are available lots for new service in the  
10 service area. The wastewater treatment facilities are considered 100% U&U due to  
11 buildout when the calculated U&U percentage by both myself and Staff is 37%.

12 The Rosalie Oaks wastewater collection system is considered 100% U&U, when  
13 the actual calculations show that it is 93% U&U by my calculations, and 79% by Staff.  
14 The wastewater treatment facilities are then considered 100% due to buildout even  
15 though the U&U calculations show it to be 52% U&U.

16 The Fairways system has a collection system that is considered 100% U&U in the  
17 PAA Order when the U&U calculation shows that it is 99%. This is a close distinction;  
18 however, it is important because considering the system 100% U&U is used as  
19 justification for considering the wastewater treatment plant 100% U&U when the actual  
20 calculations show it as 42%.

21

22 **Q. ARE THERE ANY SYSTEMS WHERE YOU DO AGREE THAT THE**  
23 **WASTEWATER TREATMENT FACILITIES PROVIDE SERVICE TO A**  
24 **SERVICE AREA THAT IS BUILT OUT AND HAS NO POTENTIAL FOR**

1 **EXPANSIONS?**

2 A. Yes, after careful consideration of the service areas, surrounding properties adjacent to  
3 the service areas, and a survey of utility systems in the area of the utilities, I agree that the  
4 following wastewater treatment systems are serving built out service areas and have no  
5 potential for expansion:

6 Arredondo Farms - Treatment U&U 66%;

7 Florida Central Commerce Park - Treatment U&U 41%;

8 Kings Cove - Treatment U&U 46%;

9 Morningview - Treatment U&U 33%;

10 South Seas - Treatment U&U 40%;

11 Summit Chase - Treatment U&U 36%;

12 Valencia Terrace - Treatment U&U 40%; and

13 Venetian Village - Treatment U&U 49%.

14

15 **Q. SO FOR THESE SYSTEMS THE WASTEWATER TREATMENT U&U**  
16 **SHOULD BE 100%?**

17

18 A. No, that is not my opinion. In each of these cases, there is a very low U&U for  
19 wastewater treatment. With the exception of 2 systems, the U&U is less than 50%.  
20 Clearly, there is a large portion of the treatment system that is not providing service to the  
21 customers.

22

23 **Q. HOW WOULD YOU CHARACTERIZE THE NATURE OF THE**  
24 **DIFFERENCE BETWEEN THE LOW U&U AND THE BUILT OUT SERVICE**

1 **AREA?**

2 A. As I mentioned previously regarding water treatment, there could be a number of  
3 reasons. It is possible that the facilities were originally designed to serve a larger service  
4 area than what is certificated, or the land use within the service area changed from the  
5 original concept, or the facilities could have been over designed, or the customer base  
6 could be requiring far less service than originally contemplated. Given the age of these  
7 systems, it would be difficult to find the specific reason for such a discrepancy.  
8 However, the fact remains, that there is a large amount of stranded capacity in these  
9 systems that will never be used by the customers. It is my opinion that this extra capacity  
10 should be accounted for by the U&U analysis. I am willing to accept a 25% allowance in  
11 U&U to account for reasonable mismatches between design and actual conditions and  
12 incremental capacity issues. Therefore, my opinion is that if the calculated U&U is 75%  
13 or greater, a U&U 100% is appropriate. However, for the systems that the calculated  
14 U&U percentages are less than 75%, then the calculated U&U should be used.

15

16 **Q. WHAT OTHER ISSUES DO YOU HAVE REGARDING WASTEWATER**  
17 **TREATMENT U&U?**

18 A. I have several objections to reliance on the prior order to justify a higher than  
19 calculated U&U. I found five instances where the calculated U&U was less than a prior  
20 order as a result of lower flows or lower growth, and it is my opinion that the calculated  
21 U&U percentages are the most accurate for use in this rate proceeding.

22

23 **V. WATER DISTRIBUTION AND WASTEWATER COLLECTION USED**  
24 **AND USEFUL**

1

2 **Q. DESCRIBE YOUR U&U METHODOLOGY FOR WATER DISTRIBUTION**  
3 **AND WASTEWATER COLLECTION SYSTEMS?**

4 A. For the most part, I used the lot to lot methodology based on counts of customers and  
5 lots adjacent to service lines as counted from the service area maps as provided by AUF  
6 in the MFRs. Exhibit ATW-9 presents my calculations of the water distribution and  
7 wastewater collection U&U.

8

9 **Q. WHAT ARE THE RESULTS OF YOUR U&U ANALYSIS OF THE**  
10 **PROTESTED SYSTEMS?**

11 A. In many cases, my U&U calculations are similar to what was determined by AUF and  
12 Staff. However, as with water treatment, I found that the PAA Order includes higher  
13 than calculated U&U numbers based on buildout conditions and reliance on prior orders.  
14 I have already stated previously in my testimony why such blanket determinations result  
15 in inaccurate U&U determinations.

16

17 **Q. PLEASE EXPLAIN WHY YOU DO NOT AGREE WITH THE SYSTEMS IN**  
18 **THE PAA THAT ARE CONSIDERED 100% U&U DUE TO BUILDOUT?**

19 A. Staff has historically assumed that systems that are 95% built out with little or no  
20 growth to be considered 100% U&U. I find this to be an inappropriate rounding practice  
21 that only serves to overstate the U&U of the distribution system. This is a particularly  
22 sensitive issue because in some cases a 100% U&U water distribution or wastewater  
23 collection system also is used to justify a higher than calculated U&U percentage for  
24 treatment systems, many of which have very low calculated U&U percentages.

1 I am of the opinion that rounding to a single percentage point is an appropriate  
2 level of accuracy that neither favors the customers or AUF. The U&U stands as  
3 calculated which in some cases may be 99%. This methodology avoids overstating, and  
4 in some cases grossly overstating, the U&U percentage of treatment facilities.

5  
6 **Q. WHAT IS YOUR OPINION CONCERNING SYSTEMS WHERE THE U&U IS**  
7 **STATED AS 100% IN THE PAA ORDER AS THE RESULT OF A PRIOR**  
8 **ORDER?**

9 A. As I mentioned previously, U&U should always be reevaluated in a new rate case. As  
10 a result of relying on prior orders, many line U&U percentages are overstated. For  
11 example, Rosalie Oaks is considered 100% U&U based on a prior order when all three  
12 parties have calculated the actual U&U to be 80%. My opinion is that the calculated  
13 U&U number should be used.

14  
15 **Q. ARE THERE ANY PARTICULAR U&U DIFFERENCES YOU WISH TO**  
16 **COMMENT ON?**

17 A. Yes. For the most part, the systems consist of a residential customer base, and a direct  
18 comparison of lot to lot is an accurate and appropriate means of determining U&U for  
19 water distribution and wastewater collection. There are a few systems, however, where  
20 there is either a large portion of multifamily connections on a single lot or commercial  
21 customers where a direct lot to lot calculation is not accurate. It appears that this  
22 methodology is generally agreed to by all parties. However, I found one case for the  
23 Jungle Den wastewater collection system where my methodology generated a different  
24 U&U percentage than Staff or AUF. From Staff work papers, an actual U&U of 140 is

1 calculated by comparing the number of customers to the number of lots in the service  
2 area. In my approach, I compared the number of customers to the number of potential  
3 customers in the service area based on the service area maps provided with the MFRs.  
4 My U&U calculations indicated a U&U of 87%.

5

6 **VI. PRO FORMA ADJUSTMENTS TO RATE BASE**

7

8 **Q. PLEASE EXPLAIN YOUR POSITION REGARDING THE PRO FORMA**  
9 **PLANT ADDITIONS TO THE LAKE JOSEPHINE/SEBRING LAKES AND**  
10 **LEISURE LAKES SYSTEMS?**

11 A. I am concerned that there is no assurance that the improvements requested by the  
12 Company will be placed into service. The PAA approves a total of \$276,392 in pro  
13 forma adjustments for the Lake Josephine/Sebring Lakes systems that have not been  
14 installed or placed into service for the benefit of the customers. Also for Leisure Lakes,  
15 the PAA Order approves \$93,700 in pro forma adjustments that have not been installed or  
16 placed into service for the benefit of the customers.

17 As part of my initial investigations in this case, I inspected several systems where  
18 there were large adjustments to rate base. Both Lake Josephine/Sebring Lakes and  
19 Leisure Lakes were on my list; however, during the time of my inspections in the winter  
20 of 2011, I was told that the systems were under design and there were no facilities to  
21 inspect. In addition, over the course of discovery, several status updates were sent by  
22 AUF that corroborated what I was told in the field. Recently, the Testimony of Mr.  
23 Luitweiler in this case stated that bids for the construction of the pro forma improvement  
24 to the Lake Josephine/Sebring Lakes system are expected on September 5, 2011, and bids

1 for the construction of the Leisure Lakes pro forma improvements are expected on  
2 November 7, 2011.

3

4 **Q. WHAT IN YOUR OPINION WOULD CONSTITUTE REASONABLE**  
5 **ASSURANCE THAT THE PRO FORMA IMPROVEMENTS WILL BE PLACED**  
6 **INTO SERVICE FOR THE BENEFIT OF THE CUSTOMERS?**

7 A. I am of the opinion that at a minimum secured bids and construction underway would  
8 be reasonable assurance. My concern is that, even though the equipment for these  
9 improvements has been purchased, they still may not be actually be installed and placed  
10 into operation. Even though the projects may be bid out to a contractor to install, there  
11 may be other reasons that could delay or prevent the project from being completed. I  
12 believe once construction is under way there is a high likelihood that the facilities will be  
13 completed.

14

15 **Q. IN MR. LUITWIELLER'S TESTIMONY, IT APPEARS THAT SEVERAL**  
16 **PRO FORMA PROJECTS WILL BE BID FOR CONTRUCTION AS THIS RATE**  
17 **CASE PROGRESSES. WHAT IS YOUR OPINION OF THE CHANGING**  
18 **NATURE OF THE STATUS OF THESE PROJECTS?**

19 A. I would consider a Notice to Proceed to the contractor and verification that physical  
20 construction has started to be reasonable evidence that the projects should be placed into  
21 rate base and I am willing to change my opinion if this occurs by the end of this rate  
22 proceeding.

23

24 **Q. WHAT ARE YOUR FINDINGS ABOUT THE COMPLIANCE STATUS OF**

1 **THE AUF SYSTEMS WITH ENVIRONMENTAL REGULATIONS?**

2 A. I reviewed information regarding AUF's systems provided by FDEP from their  
3 compliance database and present a summary of that information in ATW-10. This data  
4 base provided information regarding various FDEP compliance issues with AUF systems  
5 from January 2001 through July 2011.

6 The first page of ATW-10 presents a listing by AUF system of water violations.  
7 Since 2007, there have been a total of 26 primary water quality violations, 20 total  
8 coliform violations, 15 secondary violations and 15 violations for late or not reported  
9 parameters (shown as MNR in the Exhibit). Since 2010, there have been total of 3  
10 primary water quality violations, 6 total coliform violations, 2 secondary violations and 1  
11 violation for late or not reported parameters.

12 Exhibit ATW-10 also shows the number of compliance issues regarding the AUF  
13 wastewater systems. Since 2007, the AUF wastewater treatment plants have been found  
14 to have minor out of compliance notices 96 times and significant out of compliance  
15 issues 39 times. Since 2010, these same systems have been found to have minor out of  
16 compliance issues 40 times and significant out of compliance issues 11 times.

17 Finally, Exhibit ATW-10 shows the number of notices sent to AUF water  
18 systems. Since 2007, AUF water systems have had 5 boil water precautionary notices, 11  
19 formal consent orders, 12 formal warning letters and 22 instances where the consumer  
20 confidence reports received were not in compliance. Since 2010, AUF water systems  
21 have had 1 boil water notice, 2 formal consent orders, 2 formal warning letters and 11  
22 instances where consumer confidence reports received were not in compliance.

23 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

24 A. Yes it does.



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was furnished by e-mail and

U.S. Mail this 22nd day of September, 2011 to:

Ralph Jaeger  
Caroline Klancke  
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**EXHIBIT ATW-1**

**RESUME OF ANDREW T. WOODCOCK**



## Andrew T. Woodcock, P.E., M.B.A.

### Senior Project Manager

Mr. Woodcock has been involved with many different facets of environmental engineering. He has special expertise in utility master planning, due diligence investigations, utility valuations, financial feasibility analyses and business plans. Mr. Woodcock's skills include assisting utilities prepare operating and capital programs and supporting those programs with a series of rates and charges to provide for their successful implementation. He is also experienced in conducting economic and feasibility analyses and serves as an expert witness on utility rate regulatory matters.

### EXPERIENCE

Mr. Woodcock's water and wastewater utility planning experience includes several master plans, and capital improvements programs that include water, wastewater and reclaimed water utilities. Recent planning projects include the City of Deltona Water and Wastewater Master Plans, the City of Bartow Water Master Plan, and the City of Naples Integrated Water Supply Study. As part of the planning process Mr. Woodcock has conducted numerous economic, present value and feasibility analyses that evaluate the financial impacts of utility programs and provide useful decision criteria for capital planning.

Mr. Woodcock has participated in over 60 water and wastewater utility valuations and acquisitions for utility systems located throughout the Southeast United States. The acquisition projects cover a wide range of utility system configurations and sizes and include engineering due diligence inspections, valuations, and financing activities associated with the transactions. Major projects include the City of Peachtree City GA acquisition of Georgia Utilities Company, the City of Winter Haven FL acquisition of Garden Grove Water Company and the acquisition of the Deltona and Marion County systems from Florida Water Services Corp.

Additionally, Mr. Woodcock has experience in the review and analysis of water and wastewater utility rates, charges and impact fees. His experience also extends to providing financial feasibility documentation in support of revenue bonds, and utility financial feasibility studies in support of capital funding including studies for the Cities of Apopka, Naples, and Bartow, Pasco County and the Tohopekaliga Water Authority.

Specific Recent Project Experience Includes:

#### Deltona, Florida

Utility Acquisition of Florida Water Services Corp (2003)

Consulting Engineers Report, Series 2003; Utility System Revenue Bonds, \$81.72 million.

Water and Wastewater Impact Fee Study (2005)

Water and Wastewater Rate Study (2006)

Utility Replacement Cost Study (2004)

Stormwater Utility Rate Study (2008)

#### Project Role:

Senior Project Manager

#### Education:

B.S.E., University of Central Florida, 1988

M.S.E., University of Central Florida, 1989

M.B.A., Rollins College, 2001

#### Registrations/Certifications:

Professional Engineer, Florida, No. 47118

Professional Engineer, Louisiana, No. 34145

Professional Engineer, Alabama, No. 30585

#### Professional Affiliations:

Water Environment Federation

American Water Works Association

Florida Stormwater Association

#### Office:

Orlando, Florida

#### Years of Experience:

21

#### Years with Tetra Tech:

20



**Andrew T. Woodcock, P.E., M.B.A.**  
Senior Project Manager

Water and Wastewater Master Plans (2006)

**Marion County Florida**

Water and Wastewater Impact Fee Study (2005)

Utility Acquisition of Florida Water Services (2003)

Water and Wastewater Utility Master Plan (2005)

**City of Orlando, Florida** - Research Park Reuse Economic Impact Evaluation (2005)

**Collier County, Florida** - Utility Regulatory Services – Orangetree Utilities (2004)

**St. Johns County, Florida** - Utility Regulatory Services – Intercoastal Utilities (2002, 2005)

**Pasco County, Florida**

Acquisition Feasibility Program (2001)

Acquisition of East Pasco Utilities and Forrest Hills Utilities (2002)

Utility Valuation of Lindrick Utilities and Hudson Utilities (2004)

Comprehensive Water, Wastewater and Reclaimed Water Rate and Charge Study (2003, 2007, 2011)

Reclaimed Water Rate Study (2005)

Water, Wastewater, and Reclaimed Water Impact Fee Review (2005)

Series 2006 Water and Sewer Refunding Revenue Bonds, \$71.16 million

Series 2008 Water and Sewer Revenue Bonds, \$182 million

**City of Naples Florida**

Reclaimed Water Project Assessment and Funding Program (2006)

Comprehensive Water, Wastewater and Reclaimed Water Rate Study (2007)

Stormwater Utility Financial Review (2007)

Integrated Water Supply Study (2009)

**City of Minneola, Florida**

Water Impact Fee Update (2006)

Stormwater Utility Rate Study (2006)

**State of Florida - Office of Public Counsel**

Utility Regulatory Services – Aqua America Utilities (2007, 2008, 2011)

Utility Regulatory Services – Water Used and Useful Rule (2008)

Utility Regulatory Services – Water Management Services, Inc. (2010)

Utility Regulatory Services – KW Resort Utilities (2008)

**City of Punta Gorda, Florida**

Water Treatment cost Analysis Report (2010)



**Andrew T. Woodcock, P.E., M.B.A.**  
Senior Project Manager

City of Hunstville, Alabama

Alternative Water Supply Study (2008)

**PAPERS/PRESENTATIONS**

"Water and Wastewater Impact Fees: An Overview" Alabama Water Pollution Control Association, July 28, 2008.

**EXHIBIT ATW 2**  
**LIST OF PROTESTED SYSTEMS**

**EXHIBIT ATW-2  
PROTESTED SYSTEMS**

**Water Treatment**

Arredondo Estates  
Arredondo Farms  
Breeze Hill  
Carlton Village  
EastLake Harris/Friendly Center  
Fairways  
Fern Terrace  
Hobby Hills  
Interlachen/Park Manor  
Lake Josephine/Sebring Lakes  
Picciola Island  
Rosalie Oaks  
Silver Lakes Estates/Western Shores  
Tomoka View  
Twin Rivers  
Venetian Village  
Welaka  
Zephyr Shores

**Water Distribution**

Arredondo Estates  
Arredondo Farms  
Beecher's Point  
Breeze Hill  
Fairways  
Gibsonia Estates  
Interlachen/Park Manor  
Lake Josephine/Sebring Lakes  
Kingswood  
Oakwood  
Orange Hill/Sugar Creek  
Palms Mobile Home Park  
Palm Port  
Peace River  
Piney Woods  
Ravenswood  
River Grove  
Rosalie Oaks  
Silver Lakes Estates/Western Shores  
Silver Lakes Oaks  
Skycrest  
Stone Mountian  
Sunny Hills  
Tomoka Veiw  
Twin Rivers  
Valencia Terrace  
Venetian Village  
Village Water  
Welaka  
Wootens  
The Woods  
Zephyr Shores

**Wastewater Treatment**

Arredondo Farms  
Breeze Hill  
Fairways  
Florida Central Commerce Park  
Holiday Haven  
Jungle Den  
Kings Cove  
Leisure Lakes  
Morningview  
Palm Port  
Peace River  
Rosalie Oaks  
Silver Lake Oaks  
South Seas  
Summit Chase  
Sunny Hills  
Valencia Terrace  
Venetian Village  
Village Water  
The Woods

**Wastewater Colleciton**

Beecher's Point  
Breeze hill  
Fairways  
Florida Central Commerce Park  
Holiday Haven  
Jungle Den  
Peace River  
Rosalie Oaks  
Silver Lake Oaks  
Sunny Hills  
Village Water  
The Woods  
Zephyr Shores

**EXHIBIT ATW-3**

**COMPARISON OF U&U CALCULATIONS AND  
PAA ORDER RECOMMENDATIONS**



**EXHIBIT ATW-3  
 COMPARISON OF U&U CALCULATIONS AND PAA ORDER RECOMMENDATIONS**

System	AUF Calc	Staff Calc	OPC	PAA Rec	PAA Comments
<b>WATER TREATMENT</b>					
Arredondo Estates	19.81	79.63	80%	100	Built Out
Arredondo Farms	60.56	60.55	61%	100	Built Out
Breeze Hill	(1)	(1)	26%	100	One Well
Carlton Village	76.72	91.3	91%	95	Prior Order
East Lake Harris/Friedly Center	0	41.24	41%	100	Built Out
Faiways at Mt. Plymouth	78.09	78.08	100%	100	Built Out
Fern Terrace	(1)	(1)	68%	100	One Well
Hobby Hills	41.12	41.12	41%	100	Built Out
Interlachen - Park Manor	76.26	76.25	76%	100	Built Out
Lake Josephine/Sebring	35.97	32.29	25%	85	Weighted Ave U&U
Picciola Island	52.73	55.9	56%	75	Prior Order
Rosalie Oaks	(1)	(1)	12%	100	One Well
Silver Lakes Estates	77.16	77.16	74%	94	Prior Order
Tomoka	42.02	42.02	43%	100	Built Out
Twin Rivers	(1)	(1)	24%	100	One Well
Venetian Village	57.72	62.34	63%	74	Prior Order
Welaka Saratgoa Harbour	73.78	73.92	74%	80	Prior Order
Zephyr Shores	26.16	25.92	26%	100	Built Out
<b>WATER DISTRIBUTION</b>					
Arredondo Estates	46.8	46.84	90%	100	Prior Order
Arredondo Farms	88.44	88.44	87%	88	U&U Calc
Beechers Point	55.9	55.91	58%	100	Prior Order
Breeze Hill	97	96.97	92%	100	Built Out
Fariways	98.8	98.77	100%	100	Built Out
Gibsonia Estates	98.1	98.06	84%	100	Prior Order
Interlachen/Park Manor	77.9	77.87	79%	83	Prior Order
Kingswood	100	100	98%	100	Prior Order
Lake Josephine/Sebring Lakes	55.4	55.38	56%	55	
Oakwood	83.9	83.88	98%	100	Built Out
Orange Hill/Sugar Ck	90.1	90.11	94%	100	Prior Order
Palms MHP	81	81.01	79%	88	Prior Order
Palm Port	90.8	90.83	94%	100	Prior Order
Peace River	81.7	81.68	79%	100	Built Out
Piney Woods	84.5	84.51	89%	100	Prior Order
Ravenswood	85.2	85.19	88%	100	Prior Order
River Grove	99.1	99.12	99%	100	Prior Order
Rosalie Oaks	80	80	80%	100	Prior Order
Silver Lakes Estates	80.5	90.48	88%	100	Prior Order
Silver Lakes Oaks	86.8	86.79	83%	87	
Skycrest	90.4	90.37	93%	100	Prior Order

System	AUF Calc	Staff Calc	OPC	PAA Rec	PAA Comments
Stone Mountain	45.5	45.45	48%	54	Prior Order
Sunny Hills	10.3	10.32	11%	13	Prior Order
Tomoka	99.5	99.49	100%	100	Prior Order
Twin Rivers	97.5	97.5	98%	100	Prior Order
Valencia Terrace	99.4	99.45	100%	100	Prior Order
Venetian Village	84.79	84.82	81%	85	
Village Water	86.4	86.36	68%	100	Prior Order
Welaka	51.5	51.64	51%	52	
Wootens	42.6	42.59	43%	66	Prior Order
The Woods	75.5	75.47	70%	76	
Zephyr Shores	99.8	99.81	100%	100	Prior Order
<b>WASTEWATER TREATMENT</b>					
Arredondo Farms	67.47	67.47	66%	100	Built Out
Breeze Hill	95.86	51.08	24%	56	
Fairways at Mt. Plymouth	39.95	39.95	42%	100	Built Out
FL Central Commerce Park	43.43	43.43	41%	100	Built Out
Holiday Haven	62.12	62.12	62%	75	Prior Order
Jungle Den	72.16	36.81	37%	100	Built Out
Kings Cove	47.05	47.05	46%	100	Built Out
Leisure Lakes	32.26	32.26	32%	39	Prior Order
Morningveiw	32.97	33.11	33%	100	Built Out
Palm Port	103.34	38.29	51%	58	Prior Order
Peace Rvier	54.43	54.43	56%	100	Built Out
Rosalie Oaks	56.72	56.72	50%	100	Built Out
Silver Lake Oaks	27.87	34.84	34%	42	Prior Order
South Seas	39.29	39.29	40%	100	Built Out
Summit Chase	36.47	36.47	36%	100	Built Out
Sunny Hills	23.24	23.24	23%	49	Prior Order
Valencia Terrace	41.03	38.95	40%	100	Built Out
Venetian Village	49.57	49.57	49%	100	Built Out
Village Water	78.93	78.9	64%	79	U&U Calc
The Woods	74.98	74.98	61%	100	Built Out
<b>WASTEWATER COLLECTION</b>					
Beecher's Point	37	36.96	45	100	Prior Order
Breeze Hill	96.2	96.21	94	100	
Fairways	98.4	98.36	99	100	
Fl. Central Commerce Park	108.3	108.3	100	100	Prior Order
Holiday Haven	68.5	68.52	69	75	Prior Order
Jungle Den	104.2	140.2	87	100	Prior Order
Peace River	80	80	79	100	Built Out
Rosalie Oaks	79.2	79.2	93	100	Prior Order
Silver Lake Oaks	86.8	86.79	83	87	U&U Calc
Sunny Hills	55.3	55.32	36	55	U&U Calc
Village Water	57.6	57.54	42	58	U&U Calc
The Woods	70.9	70.87	61	71	U&U Calc
Zephyr Shores	100	100	100	100	Prior Order

**EXHIBIT ATW-4**

**COMPARISON OF U&U GROWTH FACTORS  
2008 RATE CASE TO PAA ORDER**

**EXHIBIT ATW-4  
 COMPARISON OF U&U GROWTH FACTORS  
 2008 RATE CASE TO PAA ORDER**

System	Growth Factor Prior Rate Case	Growth Factor Current Rate Case
<b>Water Treatment</b>		
Arredondo Estates	1.00	1.00
Arredondo Farms	1.00	1.00
Breeze Hill	NA	1.00
<b>Carlton Village</b>	<b>1.25</b>	<b>1.19</b>
EastLake Harris/Friendly Center	1.00	1.00
Fairways	NA	1.00
Fern Terrace	1.00	NA
<b>Hobby Hills</b>	<b>1.04</b>	<b>1.00</b>
Interlachen/Park Manor	1.00	1.00
<b>Lake Josephine/Sebring Lakes</b>	<b>1.06/1.25</b>	<b>1.00</b>
Picciola Island	1.03	1.06
Rosalie Oaks	1.00	
<b>Silver Lakes Estates/Western Shores</b>	<b>1.06</b>	<b>1.00</b>
Tomoka View	1.00	1.00
Twin Rivers	1.00	
<b>Venetian Village</b>	<b>1.14</b>	<b>1.08</b>
Welaka	1.00	1.00
Zephyr Shores	1.00	1.00
<b>Water Distribution</b>		
Arredondo Estates	1.00	1.00
Arredondo Farms	1.00	1.00
Beecher's Point		1.00
Breeze Hill	NA	1.00
Fairways	NA	1.00
<b>Gibsonia Estates</b>	<b>1.05</b>	<b>1.00</b>
<b>Interlachen/Park Manor</b>	<b>1.05</b>	<b>1.00</b>
<b>Lake Josephine/Sebring Lakes</b>	<b>1.12</b>	<b>1.00</b>
Kingswood	1.00	1.00
Oakwood	NA	1.00
Orange Hill/Sugar Creek	1.00	1.00
Palms Mobile Home Park	1.00	1.00
Palm Port	1.00	1.00
Peace River	NA	1.00
<b>Piney Woods</b>	<b>1.02</b>	<b>1.00</b>
<b>Ravenswood</b>	<b>1.07</b>	<b>1.00</b>
<b>River Grove</b>	<b>1.01</b>	<b>1.00</b>
Rosalie Oaks	1.00	1.00
<b>Silver Lakes Estates/Western Shores</b>	<b>1.06</b>	<b>1.00</b>
Silver Lakes Oaks	NA	1.00
<b>Skycrest</b>	<b>1.01</b>	<b>1.00</b>

System	Growth Factor Prior Rate Case	Growth Factor Current Rate Case
Stone Mountian	NA	1.00
Sunny Hills	NA	1.14
Tomoka Veiw	1.00	1.00
Twin Rivers	1.00	1.00
Valencia Terrace	1.00	1.00
<b>Venetian Village</b>	<b>1.10</b>	<b>1.08</b>
Village Water	1.00	1.00
Welaka	NA	1.08
<b>Wootens</b>	<b>1.10</b>	<b>1.00</b>
The Woods	NA	1.00
Zephyr Shores	1.00	1.00
<b>Wastewater Treatment</b>		
Arredondo Farms	1.00	1.00
Breeze Hill	NA	1.00
Fariways	NA	1.00
Florida Central Commerce Park	1.00	1.00
<b>Holiday Haven</b>	<b>1.04</b>	<b>1.00</b>
<b>Jungle Den</b>	<b>1.03</b>	<b>1.00</b>
<b>Kings Cove</b>	<b>1.01</b>	<b>1.00</b>
<b>Leisure Lakes</b>	<b>1.01</b>	<b>1.00</b>
Morningview	1.00	1.14
<b>Palm Port</b>	<b>1.01</b>	<b>1.00</b>
Peace River	NA	1.00
Rosalie Oaks	1.00	1.00
Silver Lake Oaks	1.00	1.00
South Seas	1.00	1.00
Summit Chase	1.00	1.00
<b>Sunny Hills</b>	<b>1.03</b>	<b>1.00</b>
Valencia Terrace	1.01	1.06
<b>Venetian Village</b>	<b>1.05</b>	<b>1.00</b>
Village Water	NA	1.06
The Woods	1.00	1.00
<b>Wastewater Colleciton</b>		
Beecher's Point	1.00	1.00
Breeze hill	NA	1.00
Fairways	NA	1.00
Florida Central Commerce Park	1.00	1.00
Holiday Haven	NA	1.00
<b>Jungle Den</b>	<b>1.03</b>	<b>1.00</b>
Peace River	1.00	1.00
Rosalie Oaks	1.00	1.00
Silver Lake Oaks	NA	1.00
Sunny Hills	NA	1.00
Village Water	NA	1.06
The Woods	NA	1.00
Zephyr Shores	1.00	1.00

**EXHIBIT ATW-5**

**WATER TREATMENT U&U CALCULATIONS**

## Arredondo Estates

Total Gallons Pumped/Purchased (1,000 gal)	13,320	From MFRs
Maximum Day Flow (gpd)	71,000	Matches MFRs
Calculated Peak Hour Flow (gpd)	142,000	
Peak Factor	2	

Maximum Day Flow (gpm)	49.31
Calculated Peak Hour Flow (gpm)	98.61
Peak Factor	2

Unaccounted for Water Adjustment		
UAW	16.1%	From MFRs
Excess	6.1%	

Adjustment (gpm)	1.5
------------------	-----

Adjusted Flows	
Maximum Day Flow (gpm)	47.76
Calculated Peak Hour Flow (gpm)	95.52

GROWTH ADJUSTMENT		
2009 SFR Cust	215.0	From MFRs
2014 SFR Cust Trended	215.0	From MFRs
Growth Factor	1.00	

Adjusted Flows	
Maximum Day Flow (gpm)	47.76
Calculated Peak Hour Flow (gpm)	95.52

Required Fire Flow (gpm)	0
--------------------------	---

### Wells

	120 gpm
	120 gpm
Total	240
Firm	120

Doesn't match MFR Aqua agreed to these values in Resp. to PSC Sixth data req.  
 Doesn't match MFR Aqua agreed to these values in Resp. to PSC Sixth data req.

### Treatment Used and Useful

Firm Capacity (gpm)	120
Peak Hour Flow (gpm)	96
Calculated Used and Useful	79.60%

U&U Treatment	79.60%
U&U Storage	0.00%

## Arredondo Farms

Total Gallons Pumped/Purchased (1,000 gal)	20,353	From MFRs
Maximum Day Flow (gpd)	109,000	Matches MFRs
Calculated Peak Hour Flow (gpd)	218,000	
Peak Factor	2	
Maximum Day Flow (gpm)	75.69	
Calculated Peak Hour Flow (gpm)	151.39	
Peak Factor	2	
<b>Unaccounted for Water Adjustment</b>		
UAW	7.3%	From MFRs
Excess	0.0%	
Adjustment (gpm)	0.0	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	75.69	
Calculated Peak Hour Flow (gpm)	151.39	
<b>GROWTH ADJUSTMENT</b>		
2009 SFR Cust	351.0	From MFRs
2014 SFR Cust Trended	351.0	From MFRs
Growth Factor	1.00	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	75.69	
Calculated Peak Hour Flow (gpm)	151.39	
Required Fire Flow (gpm)	0	
<b>Wells</b>		
	250 gpm	from Sanitary Survey
	300 gpm	from Sanitary Survey
Total	550	
Firm	250	
<b>Treatment Used and Useful</b>		
Firm Capacity (gpm)	250	
Peak Flow (gpm)	151	
Calculated Used and Useful	60.56%	
U&U Treatment	60.56%	
U&U Storage	0.00%	



**Breeze Hill**

Total Gallons Pumped/Purchased (1,000 gal)	4,137	From MFRs
Maximum Day Flow (gpd)	33,500	Matches MFRs
Calculated Peak Hour Flow (gpd)	67,000	
Peak Factor	2	

Maximum Day Flow (gpm)	23.26
Calculated Peak Hour Flow (gpm)	46.53
Peak Factor	2

**UNACCOUNTED FOR WATER ADJUSTMENT**

UAW	16.1%	From MFRs
Excess	6.1%	

UAW Adjustment (gpm)	0.5
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**Adjusted Flows**

Maximum Day Flow (gpm)	22.784
Calculated Peak Hour Flow (gpm)	45.568

**GROWTH ADJUSTMENT**

2009 SFR Cust	122.0	From MFRs
2014 SFR Cust Trended	122.0	From MFRs
Growth Factor	1.00	

**Adjusted Flows**

Maximum Day Flow (gpm)	22.78
Calculated Peak Hour Flow (gpm)	45.57

Required Fire Flow (gpm)	0
--------------------------	---

**Wells**

	177 gpm	from MFRs need to verify in field
	177 gpm	
Total	177	
Firm	177	

**Treatment Used and Useful**

Firm Capacity (gpm)	177
Peak Hour Flow (gpm)	46
Calculated Used and Useful	25.74%

U&U Treatment	25.74%
U&U Storage	0.00%

## Carlton Village

Total Gallons Pumped/Purchased (1,000 gal)	18,678	From MFRs
Maximum Day Flow (gpd)	110,480	Matches MFRs
Calculated Peak Hour Flow (gpd)	220,960	
Peak Factor	2	
Maximum Day Flow (gpm)	76.72	
Calculated Peak Hour Flow (gpm)	153.44	
Peak Factor	2	
<b>UNACCOUNTED FOR WATER ADJUSTMENT</b>		
UAW	7.2%	From MFRs
Excess	0.0%	
UAW Adjustment (gpm)	0.0	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	76.722	
Calculated Peak Hour Flow (gpm)	153.444	
<b>GROWTH ADJUSTMENT</b>		
2009 SFR Cust	255.0	From MFRs
2014 SFR Cust Trended	304.0	From MFRs
Growth Factor	1.19	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	91.46	
Calculated Peak Hour Flow (gpm)	182.93	
Required Fire Flow (gpm)	0	
<b>Wells</b>		
	200 gpm	From Sanitary Survey
	200 gpm	From Sanitary Survey
Total	400	
Firm	200	
<b>Treatment Used and Useful</b>		
Firm Capacity (gpm)	200	
Peak Hour Flow (gpm)	183	
Calculated Used and Useful	91.46%	
U&U Treatment	91.46%	
U&U Storage	0.00%	

### East Lake Harris - Friendly Center

Total Gallons Pumped/Purchased (1,000 gal)	5,637	From MFRs
Maximum Day Flow (gpd)	29,500	Matches MFRs
Calculated Peak Hour Flow (gpd)	59,000	
Peak Factor	2	

Maximum Day Flow (gpm)	20.49
Calculated Peak Hour Flow (gpm)	40.97
Peak Factor	2

**UNACCOUNTED FOR WATER ADJUSTMENT**

UAW	-4.2%	From MFRs
Excess	0.0%	

UAW Adjustment (gpm)	0.0
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**Adjusted Flows**

Maximum Day Flow (gpm)	20.49
Calculated Peak Hour Flow (gpm)	40.97

**GROWTH ADJUSTMENT**

2009 SFR Cust	200	From MFRs
2014 SFR Cust Trended	200	From MFRs
Growth Factor	1.00	

**Adjusted Flows**

Maximum Day Flow (gpm)	20.49
Calculated Peak Hour Flow (gpm)	40.97

Required Fire Flow (gpm)	0
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**Wells**

	100 gpm	
	<u>200</u> gpm	From Sanitary Survey Friendly Center does not match MFRs
Total	300	From Sanitary Survey East Lake Harris
Firm	100	

**Treatment Used and Useful**

Firm Capacity (gpm)	100
Peak Hour Flow (gpm)	41
Used and Useful	40.97%

U&U Treatment	40.97%
U&U Storage	0.00%

## Fairways at Mt. Plymouth

Total Gallons Pumped/Purchased (1,000 gal)	45,688	From MFRs
Maximum Day Flow (gpd)	253,000	Matches MFRs
Calculated Peak Hour Flow (gpd)	506,000	
Peak Factor	2	

Maximum Day Flow (gpm)	175.69
Calculated Peak Hour Flow (gpm)	351.39
Peak Factor	2

### UNACCOUNTED FOR WATER ADJUSTMENT

UAW	1.4%	From MFRs
Excess	0.0%	

UAW Adjustment (gpm)	0.0
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### Adjusted Flows

Maximum Day Flow (gpm)	175.69
Calculated Peak Hour Flow (gpm)	351.39

### GROWTH ADJUSTMENT

2009 SFR Cust	238.0	From MFRs
2014 SFR Cust Trended	238.0	From MFRs
Growth Factor	1.00	

### Adjusted Flows

Maximum Day Flow (gpm)	175.69
Calculated Peak Hour Flow (gpm)	351.39

Required Fire Flow (gpm)	0
--------------------------	---

### Wells

	450 gpm	From Sanitary Survey
	450 gpm	From Sanitary Survey
Total	900	
Firm	450	

### Treatment Used and Useful

Firm Capacity (gpm)	450
Peak Hour Flow (gpm)	351
Used and Useful	78.09%

U&U Treatment	78.09%
U&U Storage	0.00%

## Fern Terrace

Total Gallons Pumped/Purchased (1,000 gal)	10,410	From MFRs
Maximum Day Flow (gpd)	87,967	Matches MFRs
Calculated Peak Hour Flow (gpd)	175,934	
Peak Factor	2	
Maximum Day Flow (gpm)	61.09	
Calculated Peak Hour Flow (gpm)	122.18	
Peak Factor	2	
UNACCOUNTED FOR WATER ADJUSTMENT		
UAW	1.3%	From MFRs
Excess	0.0%	
UAW Adjustment (gpm)	0.0	
Adjusted Flows		
Maximum Day Flow (gpm)	61.09	
Calculated Peak Hour Flow (gpm)	122.18	
GROWTH ADJUSTMENT		
2009 SFR Cust	122.0	From MFRs
2014 SFR Cust Trended	122.0	From MFRs
Growth Factor	1.00	
Adjusted Flows		
Maximum Day Flow (gpm)	61.09	
Calculated Peak Hour Flow (gpm)	122.18	
Required Fire Flow (gpm)	0	
Wells		
	180 gpm	From Sanitary Survey
	_____ gpm	
Total	180	
Firm	180	
Treatment Used and Useful		
Firm Capacity (gpm)	180	
Peak Hour Flow (gpm)	122	
Used and Useful	67.88%	
U&U Treatment	67.88%	One well system; but well is greater than 150 gpm and U&U is less than 75%
U&U Storage	0.00%	

## Hobby Hills

Total Gallons Pumped/Purchased (1,000 gal)	6,216	From MFRs
Maximum Day Flow (gpd)	44,410	Matches MFRs
Calculated Peak Hour Flow (gpd)	88,820	
Peak Factor	2	
Maximum Day Flow (gpm)	30.84	
Calculated Peak Hour Flow (gpm)	61.68	
Peak Factor	2	
<b>UNACCOUNTED FOR WATER ADJUSTMENT</b>		
UAW	8.4%	From MFRs
Excess	0.0%	
UAW Adjustment (gpm)	-	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	30.84	
Calculated Peak Hour Flow (gpm)	61.68	
<b>GROWTH ADJUSTMENT</b>		
2009 SFR Cust	97.0	From MFRs
2014 SFR Cust Trended	97.0	From MFRs
Growth Factor	1.00	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	30.84	
Calculated Peak Hour Flow (gpm)	61.68	
Required Fire Flow (gpm)	0	
<b>Wells</b>		
	175 gpm	From Sanitary Survey
	150 gpm	From Sanitary Survey
Total	325	
Firm	150	
<b>Treatment Used and Useful</b>		
<b>Test 1</b>		
Firm Capacity (gpm)	150	
Peak Flow (gpm)	62	
Used and Useful	41.12%	
<b>Test 2</b>		
Firm Capacity (gpm)	150	
Max Day (gpm)	31	
Fire Flow (gpm)	0	
Peak Flow (gpm)	31	
Used and Useful	21%	
U&U Treatment	41.12%	
U&U Storage	0.00%	

**Interlachen - Park Manor**

Total Gallons Pumped/Purchased (1,000 gal)	12,437	From MFRs
Maximum Day Flow (gpd)	131,900	Matches MFRs
Calculated Peak Hour Flow (gpd)	263,800	
Peak Factor	2	

**UNACCOUNTED FOR WATER ADJUSTMENT**

UAW	10.4%	From MFRs
Excess	0.4%	

UAW Adjustment (gpd) 136

**Adjusted Flows**

Maximum Day Flow (gpd)	131,764
Calculated Peak Hour Flow (gpd)	263,527

**GROWTH ADJUSTMENT**

2009 SFR Cust	274.0	From MFRs
2014 SFR Cust Trended	274.0	From MFRs
Growth Factor	1.00	

**Adjusted Flows**

Maximum Day Flow (gpd)	131,764
Calculated Peak Hour Flow (gpd)	263,527

Required Fire Flow (gpm) 0

**Wells**

	180 gpm
	180 gpm
	0 gpm
	0 gpm
Total	360
Firm	180

From Sanitary Survey  
 From Sanitary Survey

**Storage**

Volume	25,000 gals
Adjust	0.9
Usable Volume	22,500 gals
Max Day (gal)	131,764 gals
Factor	1
Max Day Volume	131,764 gals
Fire Flow	0 gpm
Fire Flow Duration	2 hrs
Fire Volume	0 gals

Adjusted Firm Capacity(16 hrs)(gpd) 172,800

**Treatment Used and Useful**

Total 131,764 gals

Firm Capacity (gpd)	172,800
Max Day (gpd)	131,764
Fire Flows (gpd)	0
Adjusted Max Day	131,764
Used and Useful	76.25%

Used and Useful 100.00%

U&U Treatment	76.25%
U&U Storage	100.00%

**Picciola Island**

Total Gallons Pumped/Purchased (1,000 ga)	12,640	From MFRs
Maximum Day Flow (gpd)	56,950	Matches MFRs
Calculated Peak Hour Flow (gpd)	113,900	
Peak Factor	2	

Maximum Day Flow (gpm)	39.55
Calculated Peak Hour Flow (gpm)	79.10
Peak Factor	2

**UNACCOUNTED FOR WATER ADJUSTMENT**

UAW	8.4%	From MFRs
Excess	0.0%	

UAW Adjustment (gpm) -

**Adjusted Flows**

Maximum Day Flow (gpm)	39.55
Calculated Peak Hour Flow (gpm)	79.10

**GROWTH ADJUSTMENT**

2009 SFR Cust	147.0	From MFRs
2014 SFR Cust Trended	156.0	From MFRs
Growth Factor	1.06	

**Adjusted Flows**

Maximum Day Flow (gpm)	41.97
Calculated Peak Hour Flow (gpm)	83.94

Required Fire Flow (gpm) 0

**Wells**

	175 gpm	From Sanitary Survey
	150 gpm	
Total	325	
Firm	150	

**Treatment Used and Useful**

Firm Capacity (gpm)	150
Peak Flow (gpm)	84
Used and Useful	55.96%

U&U Treatment	55.96%
U&U Storage	0.00%



## Rosalie Oaks

Total Gallons Pumped/Purchased (1,000 gal)	2,009	From MFRs
Maximum Day Flow (gpd)	15,500	Matches MFRs
Calculated Peak Hour Flow (gpd)	31,000	
Peak Factor	2	
Maximum Day Flow (gpm)	10.76	
Calculated Peak Hour Flow (gpm)	21.53	
Peak Factor	2	
<b>UNACCOUNTED FOR WATER ADJUSTMENT</b>		
UAW	10.4%	From MFRs
Excess	0.4%	
UAW Adjustment (gpm)	0.0	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	10.75	
Calculated Peak Hour Flow (gpm)	21.50	
<b>GROWTH ADJUSTMENT</b>		
2009 SFR Cust	93.0	From MFRs
2014 SFR Cust Trended	93.0	From MFRs
Growth Factor	1.00	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	10.75	
Calculated Peak Hour Flow (gpm)	21.50	
Required Fire Flow (gpm)	0	
<b>Wells</b>		
	177 gpm	doesn't match 2008 rate case; or current MFRs
	_____ gpm	
Total	177	
Firm	177	
<b>Treatment Used and Useful</b>		
<b>Test 1</b>		
Firm Capacity (gpm)	177	
Peak Flow (gpm)	21	
Used and Useful	12.15%	
U&U Treatment	12.15%	One well system, but well is greater than 150 gpm and U&U is less than 75%.
U&U Storage	0.00%	

## Sebring Lakes

Total Gallons Pumped/Purchased (1,000 gal)	63,643	From MFRs
Maximum Day Flow (gpd)	398,760	Matches MFRs
Calculated Peak Hour Flow (gpd)	797,520	
Peak Factor	2	

### UNACCOUNTED FOR WATER ADJUSTMENT

UAW	5.0%	From MFRs
Excess	0.0%	

UAW Adjustment (gpm) 0

### Adjusted Flows

Maximum Day Flow (gpd)	398,760
Calculated Peak Hour Flow (gpd)	797,520

### GROWTH ADJUSTMENT

2009 SFR Cust	623.0	From MFRs
2014 SFR Cust Trended	-623.0	From MFRs
Growth Factor	1.00	

### Adjusted Flows

Maximum Day Flow (gpd)	398,760.00
Calculated Peak Hour Flow (gpd)	797,520.00

Required Fire Flow (gpm) 0

### Wells

830 gpm	Confirmed by AUF response to staff first data request
830 gpm	Confirmed by AUF response to staff first data request
400 gpm	Confirmed by AUF response to staff first data request
400 gpm	Confirmed by AUF response to staff first data request
Total 2460	
Firm 1630	

Adjusted Firm Capacity 1,564,800

### Treatment Used and Useful

Firm Capacity (gpd)	1,564,800
Max Day (gpd)	398,760
Fire Flow (gpd)	0
Adjusted Max Day	398,760
Used and Useful	25.48%

U&U Treatment	25.48%
U&U Storage	100.00%

### Storage

Volume	63,000 gals
Adjust	0.9
Usable Volume	56,700 gals
Max Day (gal)	398,760 gals
Factor	1
Max Day Allowance	398,760 gals
Fire Flow	0 gpm
Fire Flow Duration	2 hrs
Fire Volume	0 gals
Total	398,760 gals

Used and Useful 100.00%

**Silver Lake Estates - Western Shores**

Total Gallons Pumped/Purchased (1,000 gal)	191,628	From MFRs
Maximum Day Flow (gpd)	1,440,100	Matches MFRs
Calculated Peak Hour Flow (gpd)	2,880,200	
Peak Factor	2	

**UNACCOUNTED FOR WATER ADJUSTMENT**

UAW	9.9%	From MFRs
Excess	0.0%	

UAW Adjustment (gpd) -

**Adjusted Flows**

Maximum Day Flow (gpd)	1,440,100
Calculated Peak Hour Flow (gpd)	2,880,200

**GROWTH ADJUSTMENT**

2009 SFR Cust	1,600.0	From MFRs
2014 SFR Cust Trended	1,600.0	From MFRs
Growth Factor	1.00	

**Adjusted Flows**

Maximum Day Flow (gpd)	1,440,100
Calculated Peak Hour Flow (gpd)	2,880,200

Required Fire Flow (gpm) 0

**Wells**

1425 gpm	From Sanitary Survey Silver Lake Est
1425 gpm	From Sanitary Survey Silver Lake Est
600 gpm	From Sanitary Survey Western Shores
_____ gpm	
Total	3450
Firm	2025

**Storage**

Volume	50,000 gals
Adjust	0.9
Usable Vo	45,000 gals
Max Day (	1,440,100 gals
Factor	1
Max Day	1,440,100 gals
Fire Flow	0 gpm
Fire Flow	2 hrs
Fire Volun	0 gals
Total	1,440,100 gals

Adjusted Firm Capacity(16hrs)(gpd) 1,944,000

**Treatment Used and Useful**

Firm Capacity (gpd)	1,944,000		
Max Day (gpd)	1,440,100	Used and Useful	100.00%
Fire Flow (gpd)	0		
Adjusted Max Day	1,440,100		
Used and Useful	74.08%		
<b>U&amp;U Treatment</b>	74.08%		
<b>U&amp;U Storage</b>	100.00%		

**Tomoka**

Total Gallons Pumped/Purchased (1,000 gal)	14,873	From MFRs
Maximum Day Flow (gpd)	113,100	Matches MFRs
Calculated Peak Hour Flow (gpd)	226,200	
Peak Factor	2	

<b>Unaccounted for Water Adjustment</b>		
UAW	15.3%	From MFRs
Excess	5.3%	

Adjustment (gpd) 2,160

<b>Adjusted Flows</b>		
Maximum Day Flow (gpd)	110,940	
Calculated Peak Hour Flow (gpd)	221,881	

<b>GROWTH ADJUSTMENT</b>		
2009 SFR Cust	263.0	From MFRs
2014 SFR Cust Trended	263.0	From MFRs
Growth Factor	1.00	

<b>Adjusted Flows</b>		
Maximum Day Flow (gpd)	110,940	
Calculated Peak Hour Flow (gpd)	221,881	

Required Fire Flow (gpm) 0

**Wells**

	268 gpm	From Sanitary Survey
	275 gpm	From Sanitary Survey
	gpm	
	gpm	
Total	543	
Firm	268	

**Storage**

Volume	15,000 gals
Adjust	0.9
Usable Vo	13,500 gals
Max Day (	110,940 gals
Factor	1
Max Day /	110,940 gals
Fire Flow	0 gpm
Fire Flow l	2 hrs
Fire Volun	0 gals

Adjusted Firm Capacity(16 hrs)(gpd) 257,280

**Treatment Used and Useful**

Firm Capacity (gpd)	257,280		
Max Day (gpd)	110,940	Used and Useful	100.00%
Fire Flow (gpd)	0		
Adjusted Max Day	110,940		
Used and Useful	43.12%		

U&U Treatment	43.12%
U&U Storage	100.00%

Total 110,940 gals

## Twin Rivers

Total Gallons Pumped/Purchased (1,000 gal)	7,400	From MFRs
Maximum Day Flow (gpd)	61,800	Matches MFRs
Calculated Peak Hour Flow (gpd)	123,600	
Peak Factor	2	

Unaccounted for Water Adjustment		
UAW	13.3%	From MFRs
Excess	3.3%	

Adjustment (gpd)	669
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Adjusted Flows	
Maximum Day Flow (gpd)	61,131
Calculated Peak Hour Flow (gpd)	122,262

GROWTH ADJUSTMENT		
2009 SFR Cust	263.0	From MFRs
2014 SFR Cust Trended	263.0	From MFRs
Growth Factor	1.00	

Adjusted Flows	
Maximum Day Flow (gpd)	61,131
Calculated Peak Hour Flow (gpd)	122,262

Required Fire Flow (gpm)	0
--------------------------	---

### Wells

	268 gpm	No data in Sanitary Survey
	gpm	
	gpm	
	gpm	
Total	268	
Firm	268	

### Storage

Volume	15,000 gals
Adjust	0.9
Usable Volume	13,500 gals
Max Day (gal)	61,131 gals
Factor	1
Max Day Allowance	61,131 gals
Fire Flow	0 gpm
Fire Flow Duration	2 hrs
Fire Volume	0 gals

Matches MFRs if combined with Tomoka

Adjusted Firm Capacity(16 hrs)(gpd)	257,280
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### Treatment Used and Useful

Firm Capacity (gpd)	257,280
Max Day (gpd)	61,131
Fire Flow (gpd)	0
Adjusted Max Day	61,131
Used and Useful	23.76%

Total	61,131 gals
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Used and Useful	100.00%
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U&U Treatment	23.76%	One well system but well is a large pump and U&U is less than 75%.
U&U Storage	100.00%	

## Venetian Village

Total Gallons Pumped/Purchased (1,000 gal)	8,981	From MFRs
Maximum Day Flow (gpd)	41,560	Matches MFRs
Calculated Peak Hour Flow (gpd)	83,120	
Peak Factor	2	
Maximum Day Flow (gpm)	28.86	
Calculated Peak Hour Flow (gpm)	57.72	
Peak Factor	2	
UNACCOUNTED FOR WATER ADJUSTMENT		
UAW	-3.2%	From MFRs
Excess	0.0%	
UAW Adjustment (gpm)	0.0	
Adjusted Flows		
Maximum Day Flow (gpm)	28.86	
Calculated Peak Hour Flow (gpm)	57.72	
GROWTH ADJUSTMENT		
2009 SFR Cust	157.0	From MFRs
2014 SFR Cust Trended	170.0	From MFRs
Growth Factor	1.08	
Adjusted Flows		
Maximum Day Flow (gpm)	31.25	
Calculated Peak Hour Flow (gpm)	62.50	
Required Fire Flow (gpm)	0	
Wells		
	240 gpm	From Sanitary Survey
	100 gpm	From Sanitary Survey
Total	340	
Firm	100	
Treatment Used and Useful		
Test I		
Firm Capacity (gpm)	100	
Peak Flow (gpm)	63	
Used and Useful	62.50%	
U&U Treatment	62.50%	
U&U Storage	0.00%	

## Welaka - Saratoga Harbour

Total Gallons Pumped/Purchased (1,000 gal)	5,595	From MFRs
Maximum Day Flow (gpd)	49,940	Matches MFRs
Calculated Peak Hour Flow (gpd)	99,880	
Peak Factor	2	

### UNACCOUNTED FOR WATER ADJUSTMENT

UAW	0.8%	From MFRs
Excess	0.0%	

UAW Adjustment (gpd) -

### Adjusted Flows

Maximum Day Flow (gpd)	49,940
Calculated Peak Hour Flow (gpd)	99,880

### GROWTH ADJUSTMENT

2009 SFR Cust	149.0	From MFRs
2014 SFR Cust Trended	161.0	From MFRs
Growth Factor	1.08	

### Adjusted Flows

Maximum Day Flow (gpd)	53,962
Calculated Peak Hour Flow (gpd)	107,924

Required Fire Flow (gpm) 0

### Wells

	76 gpm	Matches MFRs
	110 gpm	Matches MFRs
	gpm	Matches MFRs
	gpm	
Total	186	
Firm	76	Only one Saratoga well with 2 pumps

### Storage

Volume	48,000 gals	
Adjust	0.9	
Usable Volume	43,200 gals	Verify
Max Day (gal)	53,962 gals	
Factor	1	
Max Day Allowance	53,962 gals	
Fire Flow	0 gpm	
Fire Flow Duration	2 hrs	
Fire Volume	0 gals	

Adjusted Firm Capacity(16 hrs)(gpd) 72,960

### Treatment Used and Useful

Firm Capacity (gpd)	72,960
Max Day (gpd)	53,962
Fire Flow (gpd)	0
Adjusted Max Day	53,962
Used and Useful	73.96%

Total 53,962 gals

U&U Treatment	73.96%
U&U Storage	100.00%

Used and Useful 100.00%

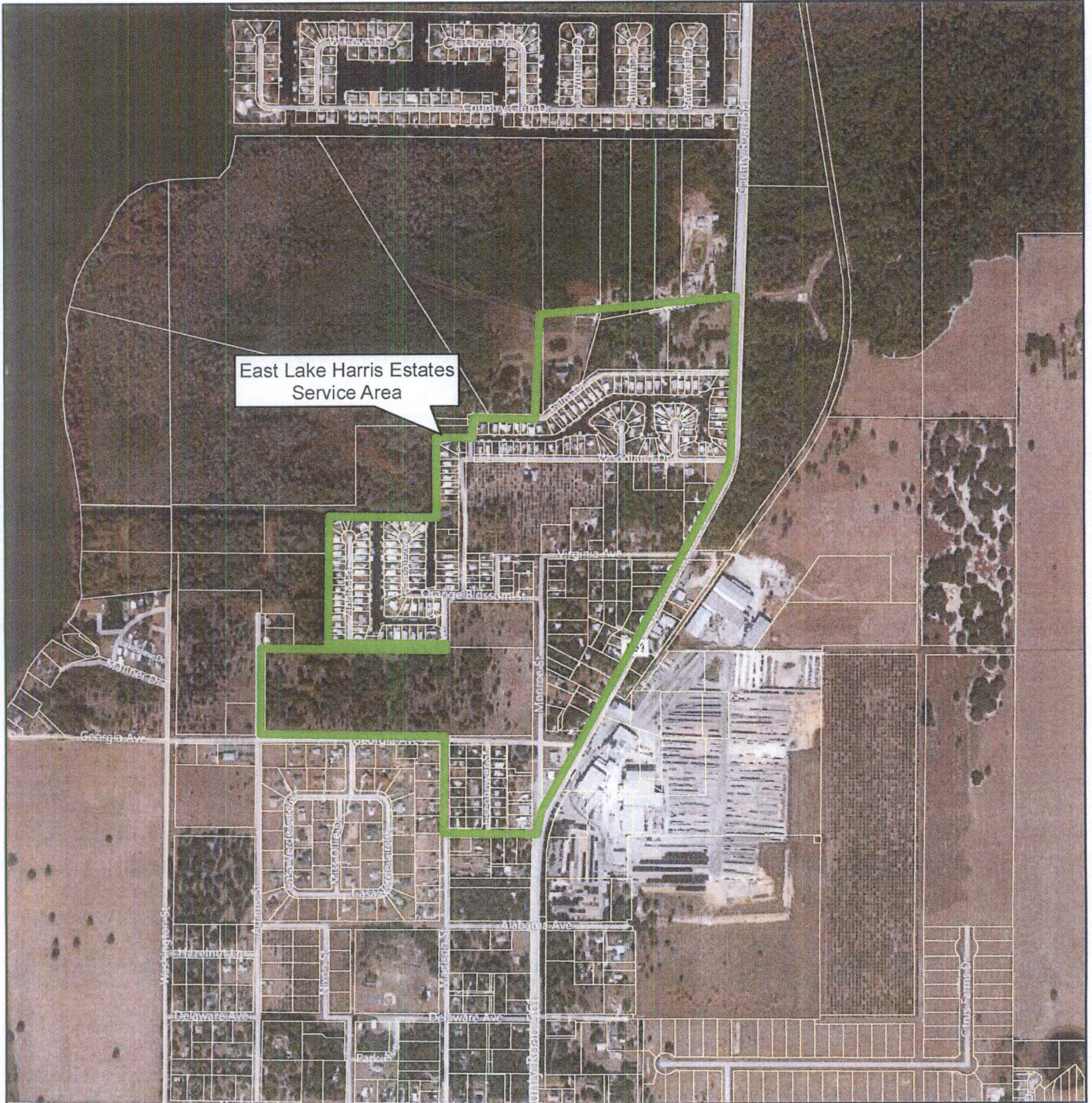
## Zephyr Shores

Total Gallons Pumped/Purchased (1,000 gal)	9,491	From MFRs
Maximum Day Flow (gpd)	95,000	Matches MFRs
Calculated Peak Hour Flow (gpd)	190,000	
Peak Factor	2	
Maximum Day Flow (gpm)	66	
Calculated Peak Hour Flow (gpm)	132	
Peak Factor	2	
<b>UNACCOUNTED FOR WATER ADJUSTMENT</b>		
UAW	16.4%	From MFRs
Excess	6.4%	
UAW Adjustment (gpm)	1.2	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	64.8	
Calculated Peak Hour Flow (gpm)	129.6	
<b>GROWTH ADJUSTMENT</b>		
2009 SFR Cust	501.0	From MFRs
2014 SFR Cust Trended	501.0	From MFRs
Growth Factor	1.00	
<b>Adjusted Flows</b>		
Maximum Day Flow (gpm)	65	
Calculated Peak Hour Flow (gpm)	130	
Required Fire Flow (gpm)	0	
<b>Wells</b>		
	530 gpm	From Sanitary Survey
	500 gpm	From Sanitary Survey
Total	1030	
Firm	500	
<b>Treatment Used and Useful</b>		
Firm Capacity (gpm)	500	
Peak Flow (gpm)	130	
Used and Useful	25.93%	
U&U Treatment	25.93%	
U&U Storage	0.00%	



**EXHIBIT ATW-6**

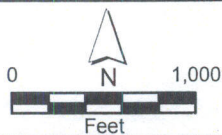
**AERIAL PHOTOGRAPH  
EAST LAKE HARRIS/FRIENDLY ESTATES  
SERVICE AREA**



Source: Lake County GIS data; Microsoft BING Aerial

LEGEND

- East Lake Harris Estates Service Area
- ▭ Parcels



EAST LAKE HARRIS ESTATES SERVICE AREA

FILE:R1084610200308465-100330GISmap.apr  
AP:ELHEstates.mxd (08-21-2011 bamj)

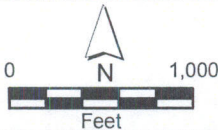
**EXHIBIT ATW-7**

**ARIAL PHOTOGRAPH  
HOBBY HILLS SERVICE AREA**



Source: Lake County GIS data; Microsoft BING Aerial

- LEGEND**
-  Hobby Hills Service Area
  -  Parcels



HOBBY HILLS SERVICE AREA

P:\11\1008463\200-08465-1\002\GIS\mapa1  
A:\hobbyhills.mxd [09-21-2011 8am]

**EXHIBIT ATW-8**

**WASTEWATER TREATMENT U&U CALCULATIONS**

## Arredondo Farms

### 2009/10 Test Year Flows

Annual Avg. (gpd)	39,667	Close to MFRs
Max. Month (gpd)	45,000	
Max. Three Mo. Avg (gpd)	42,667	from DMR analysis

### Infiltration/Inflow Adjustment

Excess I&I	0.00%
Adjustment Factor	100.00%

Adjusted Flow 39,667

### Growth Adjustment

2009 SFR Cust	325.0	From MFRs
2014 SFR Cust trend.	325.0	From MFRs
Growth Factor	1.00	

Adjusted Flow 39,667

### Permit

Flow Basis	Annual Average	
Flow (gpd)	60,000	Matches MFRs

Used and Useful 66.11%

## Breeze Hill

### 2009/10 Test Year Flows

Annual Avg. (gpd)	27,417	MFRs Use 38,344; sch F-2 shows 27,378
Max. Month (gpd)	63,000	
Max. Three Mo.Avg (gpd)	38,000	from DMR analysis

### Infiltration/Inflow Adjustment

Excess I&I	65.40%
Adjustment Factor	34.60%

Adjusted Flow	9,486	13,148
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### Growth Adjustment

2009 SFR Cust	123.0	From MFRs
2014 SFR Cust trend.	123.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	9,486	13,148
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### Permit

Flow Basis	Eff Disp	Plant
Flow (gpd)	Annual Average	Three month max
	40,000	40,000

### Used and Useful

23.72%	32.87%
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## Fairways at Mt. Plymouth

2009/10 Test Year Flows		
Annual Avg. (gpd)	31,500	Close to MFRs
Max. Month (gpd)	37,000	
Max. Three Mo.Avg (gpd)	34,333	from DMR analysis
Infiltration/Inflow Adjustment		
Excess I&I	0.00%	
Adjustment Factor	100.00%	
Adjusted Flow	31,500	
Growth Adjustment		
2009 SFR Cust	238.0	From MFRs
2014 SFR Cust trend.	238.0	From MFRs
Growth Factor	1.00	
Adjusted Flow	31,500	
Permit		
Flow Basis	Annual Average	
Flow (gpd)	75,000	Matches MFRs
Used and Useful	42.00%	



## Florida Central Commerce Park

### 2009/10 Test Year Flows

Annual Avg. (gpd)	41,917	MFRs use 44,416
Max. Month (gpd)	50,000	
Max. Three Mo.Avg (gpd)	47,333	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	7.10%
Adjustment Factor	92.90%

Adjusted Flow	38,941
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### Growth Adjustment

2009 ERUs	54.0	From MFRs
2014 ERU trend.	54.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	38,941
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### Permit

Flow Basis	Annual Average	
Flow (gpd)	95,000	Matches MFRs

Used and Useful	40.99%
-----------------	--------

## Holiday Haven

### 2009/10 Test Year Flows

Annual Avg. (gpd)	19,758	MFRs use 19758
Max. Month (gpd)	111,000	
Max. Three Mo.Avg (gpd)	51,333	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	21.39%
Adjustment Factor	78.61%

Adjusted Flow	15,532
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### Growth Adjustment

2009 SFR Cust	102.0	From MFRs
2014 SFR Cust trend.	102.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	15,532
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### Permit

Flow Basis	Annual Average	
Flow (gpd)	25,000	Matches MFRs

Used and Useful	62.13%
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## Jungle Den

### 2009/10 Test Year Flows

Annual Avg. (gpd)	15,083	Close to MRFs
Max. Month (gpd)	31,000	
Max. Three Mo.Avg (gpd)	21,667	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	49.00%
Adjustment Factor	51.00%

Adjusted Flow	7,693
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### Growth Adjustment

2009 SFR Cust	134.0	From MFRs
2014 SFR Cust trend.	134.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	7,693
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### Permit

Flow Basis	Annual Avg	
Flow (gpd)	21,000	Matches MFRs

Used and Useful	36.63%
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## Kings Cove

### 2009/10 Test Year Flows

Annual Avg. (gpd)	25,500	Close to MFRs
Max. Month (gpd)	30,000	
Max. Three Mo.Avg (gpd)	28,000	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	0.00%
Adjustment Factor	100.00%

Adjusted Flow	25,500
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### Growth Adjustment

2009 SFR Cust	195.0	From MFRs
2014 SFR Cust trend.	195.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	25,500
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### Permit

Flow Basis	Annual Avg	
Flow (gpd)	55,000	Matches MFRs

Used and Useful	46.36%
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## Leisure Lakes

### 2009/10 Test Year Flows

Annual Avg. (gpd)	16,117	Close to MFRs
Max. Month (gpd)	21,000	
Max. Three Mo.Avg (gpd)	19,133	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	0.00%
Adjustment Factor	100.00%

Adjusted Flow	16,117
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### Growth Adjustment

2009 SFR Cust	282.0	From MFRs
2014 SFR Cust trend.	282.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	16,117
---------------	--------

### Permit

Flow Basis	Annual Avg	
Flow (gpd)	50,000	Matches MFRs

Used and Useful	32.23%
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## Morningview

### 2009/10 Test Year Flows

Annual Avg. (gpd)	5,750	Close to MFRs
Max. Month (gpd)	7,000	
Max. Three Mo. Avg (gpd)	6,333	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	0.00%
Adjustment Factor	100.00%

Adjusted Flow	5,750
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### Growth Adjustment

2009 SFR Cust	34.0	From MFRs
2014 SFR Cust trend.	39.0	From MFRs
Growth Factor	1.15	

Adjusted Flow	6,596
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### Permit

Flow Basis	Annual Avg	
Flow (gpd)	20,000	Matches MFRs

Used and Useful	32.98%
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## Palm Port

### 2009/10 Test Year Flows

Annual Avg. (gpd)	17,333	Close to response to staff's 6th data req
Max. Month (gpd)	23,000	
Max. Three Mo. Avg (gpd)	20,667	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	11.85%
Adjustment Factor	88.15%

Adjusted Flow	15,279
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### Growth Adjustment

2009 SFR Cust	105.0	From MFRs
2014 SFR Cust trend.	105.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	15,279
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### Permit

Flow Basis	Annual avg
Flow (gpd)	30,000

Used and Useful	50.93%
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## Peace River

### 2009/10 Test Year Flows

Annual Avg. (gpd)	28,083	Close to MFRs
Max. Month (gpd)	36,000	
Max. Three Mo.Avg (gpd)	34,333	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	19.73%
Adjustment Factor	80.27%

Adjusted Flow	22,542	27,559
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### Growth Adjustment

2009 SFR Cust	88.0	From MFRs
2014 SFR Cust trend.	88.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	22,542	27,559
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### Permit

	Plant	Eff Disp
Flow Basis	Three Month ADF	Ann Avg
Flow (gpd)	40,000	40,000

Used and Useful	56.36%	68.90%
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## Rosalie Oaks

### 2009/10 Test Year Flows

Annual Avg. (gpd)	10,250	MFRs use 11,969; Sch F-2 shows 10,400
Max. Month (gpd)	12,000	
Max. Three Mo. Avg (gpd)	11,333	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	33.27%
Adjustment Factor	66.73%

Adjusted Flow	7,563	6,840
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### Growth Adjustment

2009 SFR Cust	92.0	From MFRs
2014 SFR Cust trend.	92.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	7,563	6,840
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### Permit

	<b>Plant</b>	<b>Effluent Disposal</b>
Flow Basis	Three Month Avg.	Annual Avg
Flow (gpd)	15,000	15,000

Used and Useful	50.42%	45.60%
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## Silver Lake Oaks

### 2009/10 Test Year Flows

Annual Avg. (gpd)	4,417	Close to MFRs
Max. Month (gpd)	7,000	
Max. Three Mo. Avg (gpd)	5,500	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	7.68%
Adjustment Factor	92.32%
Adjusted Flow	4,077

### Growth Adjustment

2009 SFR Cust	38.0	From MFRs
2014 SFR Cust trend.	38.0	From MFRs
Growth Factor	1.00	
Adjusted Flow	4,077	

### Permit

Flow Basis	Annual Avg	
Flow (gpd)	12,000	MFRs use 15,000

Used and Useful 33.98%

## South Seas

### 2009/10 Test Year Flows

Annual Avg. (gpd)	104,917	Close to MFRs
Max. Month (gpd)	125,000	MFRs use 32,000
Max. Three Mo.Avg (gpd)	125,000	from DMR Analysis

### Infiltration/Inflow Adjustment

Excess I&I	N/A
Adjustment Factor	100.00%
Adjusted Flow	104,917

### Growth Adjustment

2009 ERUs	706	From MFRs
2014 ERU trend.	706	From MFRs
Growth Factor	1.00	
Adjusted Flow	104,917	

### Permit

Flow Basis	Annual Avg	
Flow (gpd)	264,000	Matches MFRs

Used and Useful 39.74%

## Summit Chase

### 2009/10 Test Year Flows

Annual Avg. (gpd)	19,333	Close to MFRs
Max. Month (gpd)	23,000	
Max. Three Mo. Avg (gpd)	22,333	from DMR analysis

### Infiltration/Inflow Adjustment

Excess I&I	0.00%
Adjustment Factor	100.00%

Adjusted Flow	19,333
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### Growth Adjustment

2009 SFR Cust	211.0	From MFRs
2014 SFR Cust trend.	211.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	19,333
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### Permit

Flow Basis	Annual Avg	
Flow (gpd)	54,000	Matches MFRs

Used and Useful	35.80%
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## Sunny Hills

### 2009/10 Test Year Flows

Annual Avg. (gpd)	11,583	Close to MFRs
Max. Month (gpd)	13,000	MFRs use 32,000
Max. Three Mo. Avg (gpd)	13,000	from DMR analysis

### Infiltration/Inflow Adjustment

Excess I&I	0.00%
Adjustment Factor	100.00%

Adjusted Flow 11,583

### Growth Adjustment

2009 SFR Cust	167.0	From MFRs
2014 SFR Cust trend.	167.0	From MFRs
Growth Factor	1.00	

Adjusted Flow 11,583

### Permit

Flow Basis	Annual Average	
Flow (gpd)	50,000	Matches MFRs

Used and Useful 23.17%

## Valencia Terrace

### 2009/10 Test Year Flows

Annual Avg. (gpd)	30,333	Close to MFRs
Max. Month (gpd)	39,000	Matches MFRs
Max. Three Mo. Avg (gpd)	33,667	from DMR analysis

### Infiltration/Inflow Adjustment

Excess I&I	0.00%
Adjustment Factor	100.00%

Adjusted Flow 30,333

### Growth Adjustment

2009 ERUs	432.0	From MFRs
2014 ERU trend.	460.0	From MFRs
Growth Factor	1.06	

Adjusted Flow 32,299

### Permit

Flow Basis	Annual Avg	
Flow (gpd)	80,000	Matches MFRs

Used and Useful 40.37%

## Venetian Village

### 2009/10 Test Year Flows

Annual Avg. (gpd)	28,667	Close to MFRs
Max. Month (gpd)	40,000	
Max. Three Mo. Avg (gpd)	33,000	from DMR analysis

### Infiltration/Inflow Adjustment

Excess I&I	38.55%
Adjustment Factor	61.45%

Adjusted Flow	17,616
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### Growth Adjustment

2009 SFR Cust	94.0	From MFRs
2014 SFR Cust trend.	94.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	17,616
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### Permit

Flow Basis	Annual Avg	
Flow (gpd)	36,000	Matches MFRs

Used and Useful	48.93%
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## Village Water

### 2009/10 Test Year Flows

Annual Avg. (gpd)	45,667	MFRs use 55,828; Sch F-2 shows 45712
Max. Month (gpd)	59,000	
Max. Three Mo.Avg (gpd)	54,667	from DMR analysis

### Infiltration/Inflow Adjustment

Excess I&I	0.00%
Adjustment Factor	100.00%

Adjusted Flow	45,667
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### Growth Adjustment

2009 ERUs	34.0	From MFRs
2014 ERU trend.	36.0	From MFRs
Growth Factor	1.06	

Adjusted Flow	48,353
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### Permit

Flow Basis	Three Month ADF	effluent disposal limited to 45,000 AADF
Flow (gpd)	75,000	Matches MFRs

Used and Useful	64.47%
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## The Woods

### 2009/10 Test Year Flows

Annual Avg. (gpd)	10,000	MFRs use 12,000; Sch F-2 shows 9,920
Max. Month (gpd)	15,000	
Max. Three Mo.Avg (gpd)	12,000	from DMR analysis

### Infiltration/Inflow Adjustment

Excess I&I	7.59%
Adjustment Factor	92.41%

Adjusted Flow	9,241
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### Growth Adjustment

2009 SFR Cust	167.0	From MFRs
2014 SFR Cust trend.	167.0	From MFRs
Growth Factor	1.00	

Adjusted Flow	9,241
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### Permit

	<b>Plant</b>	<b>Effluent Disposal</b>	
Flow Basis	Three Month Avg	Annual Average	
Flow (gpd)	15,000	15,000	Matches MFRs

Used and Useful	61.61%	61.61%
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**EXHIBIT ATW-9**

**WATER DISTRIBUTION AND WASTEWATER  
COLLECTION U&U CALCULATIONS**

**EXHIBIT ATW-9  
WATER DISTRIBUTION U&U CALCULATIONS**

System	Lots	Map Count	Growth Factor	2014	U&U	Notes
	Fronting Mains	Customers		ERCs Total		
Arredondo Estates	277	248	1.00	248	89.53%	
Arredondo Farms	443	386	1.00	386	87.13%	
Beechers Point	84	49	1.00			No oth. cust. shown on map; current oth. cust. counted
				49	58.33%	
Breeze Hill	133	123	1.00			
				123	92.48%	
Fariways	244	243	1.00	243	99.59%	
Gibsonia Estates	237	198	1.00	198	83.54%	
Interlachen/Park Manor	367	290	1.00	290	79.02%	
Kingswood	66	65	1.00	65	98.48%	
Lake Josephine/Sebring	1012	566	1.00	566	55.93%	
Oakwood	261	255	1.00			No oth. cust. shown on map; current oth. cust. counted
				255	97.70%	
Orange Hill/Sugar Ck	258	243	1.00	243	94.19%	
Palms MHP	81	64	1.00	64	79.01%	
Palm Port	116	109	1.00	109	93.97%	
Peace River	131	103	1.00	103	78.63%	
Piney Woods	200	178	1.00	178	89.00%	
Ravenswood	52	46	1.00	46	88.46%	
River Grove	113	112	1.00	112	99.12%	
Rosalie Oaks	123	98	1.00	98	79.67%	
Silver Lakes Estates	1787	1576	1.00	1,576	88.19%	
Silver Lakes Oaks	53	44	1.00	44	83.02%	
Skycrest	131	122	1.00	122	93.13%	
Stone Mountain	21	10	1.00	10	47.62%	
Sunny Hills	6268	593	1.14	676	10.79%	
Tomoka	197	196	1.00	196	99.49%	
Twin Rivers	80	78	1.00	78	97.50%	
Valencia Terrace	360	359	1.00	359	99.72%	
Venetian Village	221	166	1.08	179	81.12%	
Village Water	260	178	1.00	178	68.46%	
Welaka	340	160	1.08			No oth. cust. shown on map; current oth. cust. counted
				173	50.82%	
Wootens	53	23	1.00	23	43.40%	
The Woods	113	79	1.00	79	69.91%	
Zephyr Shores	525	523	1.00	523	99.62%	

EXHIBIT ATW-9  
WASTEWATER COLLECTION U&U CALCULATIONS

System	Lots	Map Count	Growth	2014	U&U	Notes
	Fronting	Customers		ERCs		
	Mains		Factor	Total		
Beecher's Point	38	17	1.00	17.00	44.74%	
Breeze Hill	133	125	1.00	125.00	93.98%	
Fairways	244	241	1.00	241.00	98.77%	
Fl. Central Commerce	81	81	1.00	81.00	100.00%	
Holiday Haven	160	110	1.00	110.00	68.75%	
Jungle Den	157	137	1.00	137.00	87.26%	used connectons instead of lots
Peace River	125	99	1.00	99.00	79.20%	
Rosalie Oaks	106	99	1.00	99.00	93.40%	
Silver Lake Oaks	53	44	1.00	44.00	83.02%	
Sunny Hills	510	184	1.00	184.00	36.08%	
Village Water	88	35	1.06	37.10	42.16%	
The Woods	120	73	1.00	73.00	60.83%	
Zephyr Shores	515	514	1.00	514.00	99.81%	

**EXHIBIT ATW-10**

**SUMMARY OF FDEP COMPLIANCE DATABASES**

EXHIBIT ATW-10  
 SUMMARY OF FDEP COMPLIANCE DATABASES  
 Water System Compliance January 2001 to July 2011

System	Primary Violations			TCR Violations			Secondary Violations			MNR Violations			Other Violations		
	Total Reported	Since 2007	Since 2010	Total Reported	Since 2007	Since 2010	Total Reported	Since 2007	Since 2010	Total Reported	Since 2007	Since 2010	Total Reported	Since 2007	Since 2010
ARREDONDO ESTATES				2	1	0							2	2	0
BEECHER'S POINT S/D													2	2	0
CHULUOTA WATER SYSTEM	13	9	0	2	1	0	3	1	0				1	1	0
EAST LAKE HARRIS ESTATES							1	0	0						
FAIRWAYS AT MOUNT PLYMOUTH				2	1	0	1	0	0	90	0	0	2	0	0
FORTY-EIGHT ESTATES							1	0	0	2	0	0	1	0	0
FRIENDLY CENTER SUBDIVISION							1	1	0						
GIBSONIA ESTATES WATER SYSTEM							1	0	0	1	0	0			
GRAND TERRACE SUBDIVISION							1	0	0						
HAINES CREEK MOBILE HOME PARK							1	0	0	2	0	0	2	0	0
HARMONY HOMES				1	0	0	1	0	0						
HERMITS COVE WATER SYSTEM	1	0	0	2	1	0	3	0	0	1	0	0	3	0	0
HOBBY HILL SUBDIVISION				1	0	0									
HOLIDAY HAVEN (CONSEC.)				1	0	0							3	0	0
IMPERIAL TERRACE WEST				1	0	0	1	0	0						
INTERLACHEN LAKE ESTATES				1	1	0	1	1	0	2	0	0	1	0	0
JASMINE LAKES UTL	1	0	0	2	2	1	2	0	0				1	0	0
Jungle Den													2	1	1
KINGSWOOD MANOR(CONSEC.TO MIMS)				2	0	0							1	0	0
LAKE GIBSON ESTATES							1	0	0	2	0	0			
LAKE JOSEPHINE HEIGHTS				2	0	0	1	0	0	3	1	1	1	0	0
LAKE OSBORNE (AQUA UTILITIES)				2	1	0							4	2	1
LAKE SUZY SUBDIVISION				3	0	0									
LEISURE LAKES				3	1	1	3	0	0				3	0	0
MORNINGVIEW SUBDIVISION							1	0	0	27	0	0			
OCALA OAKS SUBDIVISION (2 WPS)	1	0	0	2	1	0				2	0	0	2	1	0
ORANGE HILL - SUGAR CREEK				1	0	0	1	0	0						
PALM PORT SUBDIVISION				4	0	0				2	2	0	2	0	0
PALM TERRACE GARDENS				5	0	0									
PEACE RIVER HEIGHTS	3	3	3	5	1	1				19	1	0	1	1	1
PINEY WOODS SUBDIVISION - 2 WTPS				2	0	0	1	0	0				1	0	0
POMONA PARK WATER SYSTEM							1	0	0	2	0	0	1	1	0
QUAIL RIDGE ESTATES							1	0	0						
RAVENSWOOD WATER SYSTEM							1	0	0						
RIVERGROVE SUBDIVISION WTP							3	2	0	4	2	0	1	0	0
ROSALIE OAKS				4	1	0	1	0	0						
SARATOGA HARBOR				1	1	0				2	2	0	2	1	0
SEBRING LAKES WATER	2	0	0	1	0	0	1	0	0				3	0	0
SILVER LAKE OAKS MHV	5	4	0	5	5	3	1	0	0	106	3	0	1	1	1
SKYCREST SUBDIVISION				1	1	0	1	0	0						
STONE MOUNTAIN ESTATES							1	0	0				2	0	0
SUMMIT CHASE VILLAS				1	0	0									
TANGERINE WATER COMPANY							2	1	1						
THE WOODS	12	6	0	1	0	0	3	0	0						
TOMOKA VIEW ESTATES	12	4	0	1	1	0	10	8	0	2	0	0	9	4	1
VALENCIA TERRACE SUBDIVISION							1	0	0						
VENETIAN VILLAGE							1	0	0	2	2	0			
VILLAGE WATER				1	0	0							2	0	0
WOOTEN'S MHP	3	0	0				2	0	0	3	1	0	4	0	0
ZEPHYR SHORES MOBILE HOME EST							2	1	1	1	1	0	1	1	0
<b>TOTAL</b>	<b>53</b>	<b>26</b>	<b>3</b>	<b>62</b>	<b>20</b>	<b>6</b>	<b>58</b>	<b>15</b>	<b>2</b>	<b>275</b>	<b>15</b>	<b>1</b>	<b>61</b>	<b>18</b>	<b>5</b>

EXHIBIT ATW-10  
 SUMMARY OF FDEP COMPLIANCE DATABASES  
 Wastewater System Compliance January 2001 to July 2011

System	Beginning Date	In Compliance			Minor Out Compliance			Significant Out Compliance		
		Total	Since 2007	Since 2010	Total	Since 2007	Since 2010	Total	Since 2007	Since 2010
Lake Suzy Utility WWTP	13-Feb-02	5	1	0	8	4	2	1	0	0
Fruitville WWTP	05-Jan-01	8	5	3	13	7	6	8	3	0
Sunny Hills WWTP	08-Nov-02	7	4	1	1	0	0	0	0	0
Summit Chase Villas	09-Aug-01	5	2	0	6	4	3	0	0	0
Venetian Village S/D	11-Jun-02	6	2	0	3	2	1	0	0	0
Kings Cove S/D	09-Aug-01	3	1	0	7	4	2	0	0	0
Valencia Terrace	24-May-01	7	3	1	5	3	1	0	0	0
Morningview WWTF	25-Oct-01	6	1	0	3	3	1	0	0	0
Holiday Haven	20-Sep-01	1	1	0	11	6	3	1	0	0
Breeze Hill MHP WWTP	08-Mar-01	5	0	0	9	6	1	0	0	0
Rosalie Oaks S/D WWTP	08-Mar-01	5	2	1	3	1	1	2	1	0
Chuluota WWTF	27-Apr-01	3	3	2	9	3	1	0	0	0
Florida Central Commerce Park	17-Jan-01	0	0	0	11	5	2	0	0	0
Jungle Den	27-Sep-01	5	4	0	9	3	1	0	0	0
Blairs Jungle Den	20-Mar-01	0	0	0	15	7	1	1	0	0
Arredondo Farms Mobile Home Park WWTF	14-Aug-01	3	2	0	8	5	1	4	2	1
Park Manor WWTF	04-Jun-02	11	9	2	3	1	0	0	0	0
Silver Lake Oaks Mobile Home Park WWTF	19-Jun-01	11	7	2	4	3	0	1	0	0
Peace River Heights WWTP	11-Jun-02	2	2	1	8	3	2	1	1	1
Jasmine Lakes S/D	31-May-01	5	3	3	9	6	3	9	8	1
Palm Terrace Gardens	31-May-01	2	0	0	5	2	0	12	11	3
Village Water Ltd	07-Aug-01	3	0	0	5	3	3	8	6	1
Woods S/D	04-Jun-02	4	2	2	6	3	0	0	0	0
Leisure Lakes Utilities AKA Covered Bridge	07-Mar-01	6	1	1	5	4	1	0	0	0
Calusa Cove WWTP FKA Shady Acres Mobile Home Sd	02-May-01	7	3	3	3	1	1	2	2	0
Fountain Lakes WWTP	19-Jul-01	2	2	1	7	0	0	4	1	0
South Seas Plantation	14-Feb-01	16	16	0	6	2	0	7	4	4
Fairways At Mt Plymouth	30-Apr-02	2	1	0	9	5	3	0	0	0
<b>TOTAL</b>		<b>140</b>	<b>77</b>	<b>23</b>	<b>191</b>	<b>96</b>	<b>40</b>	<b>61</b>	<b>39</b>	<b>11</b>

EXHIBIT ATW-10  
 SUMMARY OF FDEP COMPLIANCE DATABASES  
 Water System Notifications January 2001 to July 2011

SYSTEM	BOIL WATER-PRECAUTIONARY		FORMAL CONSENT ORDER TO FACILITY		FORMAL WARNING LETTER		CONSUMER CONFIDENCE REPORT REC'D NOT OK	
	Since 2007	Since 2010	Since 2007	Since 2010	Since 2007	Since 2010	Since 2007	Since 2010
BREEZE HILL MOBILE HOME PARK							1	1
CHULUOTA WATER SYSTEM			1	0	1	0		
GIBSONIA ESTATES WATER SYSTEM							2	1
INTERLACHEN LAKE ESTATES	1	0	1	0			1	1
JASMINE LAKES UTL							1	0
JUNGLE DEN			1	1	1	1		
LAKE GIBSON ESTATES							1	0
LAKE OSBORNE (AQUA UTILITIES)	2	1	1	0	1	0		
MORNINGVIEW SUBDIVISION			1	0	1	0		
ORANGE HILL - SUGAR CREEK							2	1
PALM PORT SUBDIVISION	1	0						
PALM TERRACE GARDENS							2	1
PEACE RIVER HEIGHTS					2	1	5	3
RIVERGROVE SUBDIVISION WTP	1	0					1	1
ROSALIE OAKS								
SILVER LAKE OAKS MHV			1	0	1	0	1	1
SUNNY HILLS UTILITIES			1	1	2	0		
THE WOODS			1	0			4	1
TOMOKA VIEW ESTATES			2	0	1	0		
ZEPHYR SHORES MOBILE HOME EST			1	0	2	0	1	0
<b>TOTAL</b>	<b>5</b>	<b>1</b>	<b>11</b>	<b>2</b>	<b>12</b>	<b>2</b>	<b>22</b>	<b>11</b>

#REF!