

FILED OCT 16, 2015 DOCUMENT NO. 06625-15 FPSC - COMMISSION CLERK

October 15, 2015

VIA E-FILING

Carlotta S. Stauffer, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

RE: Docket No. 150102-SU; Application for an increase in wastewater rates in Charlotte County by Utilities,

Inc. of Sandalhaven Our File No. 30057.221

Dear Ms. Stauffer:

The following are the responses of Utilities, Inc. of Sandalhaven, ("Utility") to the Staff's Fourth Data Request dated October 7, 2015:

In Staff's Second Data Request, Question No. 17, the utility was asked to provide a list of all general service customers by meter size. In response, the utility provided a list that identified the general service customers by meter size as either "256 Sandalhaven Wastewater General Service" or "256 Sandalhaven Wastewater Multi-Residential". For the list provided by the utility in its response, please specify the names and addresses of the general service and multi-residential customers. For multi-residential customers, please indicate the number of units.

RESPONSE: See Revised List of Sandalhaven GS customers Spreadsheet - Attachment "4-1".

For each general service and multi-residential customer, please provide the test year gallons associated with the respective customer.

RESPONSE: See Revised List of Sandalhaven GS customers Spreadsheet - Attachment "4-1".

 Please provide the name and address of the general service customer that requested to down-size its meter from 1.5" to 5/8" x 3/4".

RESPONSE: Ace Hardware of Cape Haze Inc. - 8501 Placida Rd. Unit 5, Placida, FL, 33946.

- 4. In Staff's Second Data Request, Question No. 14, the utility was asked to provide a schedule showing the number of equivalent residential connections (ERCs) connected, to date, by year since the implementation of the Allowance for Funds Prudently Invested (AFPI) charges established by Charlotte County. The Utility provided a table indicating the number of ERCs at year end from 2010 through 2014. Please provide a response to the following questions in regards to the table.
 - a. The year-end number of ERCs for 2010 was indicated as 1,006.5. The note provided in Table 24 of the Charlotte County recommended rate report indicated the number of existing ERCs

as of December 31, 2010 were 1,123, which included the Reserve Capacity ERCs. Please explain the difference in the number of ERCs.

RESPONSE: The 1,006.5 number of ERCs previously provided did not include Reserve Capacity ERCs.

b. The year end number of ERCs for 2012 decreased from the year end number for 2011. The number of ERCs would not decrease when evaluating the ERCs for AFPI. AFPI charges are a one-time charge paid per ERC at the time of an initial connection. Therefore, the number of ERCs would increase over time. However, when counting ERCs based on existing customers, the number may fluctuate. Please explain why the number of ERCs provided for purposes of AFPI fluctuated.

RESPONSE: The number of ERCs provided were based on year end existing customers. However, upon further review, the table did not include inactive accounts which should be counted for AFPI purposes. See Attachment "4-4b"

Please provide the number of ERCs remaining to build out.

RESPONSE: The master sewer plan, as provided to the staff as Exhibit 2.25 in response to SDR #2, identifies the buildout flow as 938,000 gpd. Based on an average flow of 200 gpd/ERC, the number of ERC's at buildout would be 938,000 gpd/200 gpd/ERC = 4,690 ERC's. Therefore, the number of ERC's remaining at buildout is 3,585 (4,690 – 1,105 ERCs at end of test year).

5. To follow up on questions from staff's September 15, 2015 site visit, please complete the following table. Please make necessary corrections, if any, for the lift station power meters.

	SANDALHAVEN	۱ <u></u>								
	LIFT STATIONS									
Lift Station No.	Address/Location	Power Meter Number	Pump Motor (hp)	Capacity (gpm)						
LS-1		KJ14780	<u> </u>							
LS-2		AC83591	<u> </u>							
LS-3		KJ15654								
LS-4										
LS-5		ACD1553		<u> </u>						
LS-6		ACD9841								
LS-7		ACD8684								
LS-8		AC74086		<u> </u>						
LS-9		KJ15653								
LS-1D		AC74135		<u> </u>						
LS-11		KJJ6694								
LS-12		KJ15642								
LS-13		6NL4409								

RESPONSE: See Attachment "4-5".

6. When did the Utility realize that the growth it had projected during its 2006 rate case with the Commission was not going to materialize?

RESPONSE: In early 2008, approximately one year after the revised MFRs for Docket No. 060285-SU were filed on December 28, 2006.

7. Since that time, what steps has the Utility taken to mitigate the cost impact(s) of the unrealized growth?

RESPONSE: Sandalhaven took the only actions it had available to mitigate cost impacts. First, it contacted EWD on January 25, 2008 to request an indefinite postponement of the option to purchase an additional 200,000 gpd of treatment and disposal capacity, which EWD agreed to do. Second, the Utility optimized its operation of the collection system to direct as much flow as it could to its own treatment plant rather than to EWD to avoid the higher EWD gallonage charge while maintaining compliance with the treatment and disposal constrains specified in the plant's operating permit. It should be noted that although Sandalhaven requested a postponement to purchase an additional 200,000 gpd, there was substantial basis for the purchase of the initial 300,000 gpd at the time of the purchase and, in hindsight, the facts still support that decision. In December, 2006, MFR Schedule A-12, page 3 was submitted in Docket No. 060285-SU, to support the purchases. It showed the flow commitments for which CIAC was prepaid at that time. That schedule has been brought up to date. Attachment "4-7" compares current prepaid commitments for demand with those presented in 2006, showing the portions of the prepaid commitments used and not used. This comparison substantiates the need for the capacity purchased and for Sandalhaven's position that the 300,000 gpd purchase from EWD is 100% used and useful. An important point to consider that is not reflected in the schedule is that the current flow shown is not indicative of the total capacity that was purchased and reserved for the current customer base due to its seasonal nature. The reserved capacity that is included in the tariff is 190 gpd per ERC and compares to the actual flow of 92 gpd per ERC for the current customers on an annual average basis due to the seasonal occupancy. But the full capacity must be available for those customers in the event the occupancy trend changes since the utility still has the obligation to provide that service.

8. Please refer to the Utility's response to questions 20-23 of Staff's Second Data Request dated August 25, 2015. Staff understands that the services provided by some of the vendors involved in constructing the interconnection force main would be unaffected by the size of the force main. Given this, please estimate the incremental cost difference, if any, between having a 1,000,000 gallons per day (gpd) force main and a 500,000 gpd force main. Please explain your response.

RESPONSE: There seems to be some confusion as to capacity of the force main and the basis for its design. The utility was never faced with a choice between constructing a force main able to provide for either a 500,000 gpd average system demand or a 1,000,000 gpd day average system demand. The 2004 Master Plan projected a 900,000 gpd buildout demand for the entire system, including all undeveloped areas. Of this amount, it was estimated that 70%, or 630,000 gpd would flow through this force main at buildout conditions. That is what the force main is designed for. The 1,000,000 gpd is not related to force main capacity. Instead, it describes the master lift station's peak or instantaneous flow capacity for near term projected flows of approximately 275,000 gpd using a peaking factor of 4.0.

Much attention has been paid to the difference in the cost of installing a 10" force main versus a 12" force main, as if that cost differential is significant or relevant. It is not. The Utility will concede that, all else being equal, the installed cost of a 10" main is slightly less than the installed cost of a 12" main. But what is relevant, and what was the major consideration in selecting a 12" force main, is the significantly higher operating cost of the lift station if the build out design flows were pumped through a 10" force main instead of a 12" force main.

In a letter from the design engineer dated June 26, 2007 and reinforced by the clarification letter of October 9, 2015 summarizing the force main and master lift station project, it was stated that the force main was "modeled to determine the most efficient pipeline size based on the need to produce velocity sufficient to carry solids through the pipe as well as meet the head condition (pressure) on the pump." See Attachment "4-8".

The power required to pump the flow generated at buildout and at peak demand conditions through a 12" force main can be met with two 88-Hp pumps. In comparison, two 300-Hp pumps would be required to meet peak flow conditions when pumping through a 10" force main. This would have a drastic ongoing cost impact, far offsetting any onetime saving in the installed cost of the force main. During the initial years of operation, when full projected demand was not yet evident, some savings were achievable by sizing the lift station pumps to serve current demand. The utility realized that savings by initially installing two 45-Hp pumps. Once the peak flow approaches the pumping capacity of the existing 45-Hp pumps the utility would otherwise face the choice of incurring very high operating costs after upgrading the pumping capacity of the master lift station by installing ever larger pumps or by constructing a parallel main, which would virtually double capital costs while also require the installation of larger pumps.

In its argument that the force main should be considered 100% used and useful, the utility differentiated this case from the previous docket in that FDEP is now requiring that the Sandalhaven WWTP be abandoned in 2015 and all flows diverted to EWD. This is significant, not because it changes the projected flows through the plant per the Master Plan, but because it accelerates the increased use of the force main; it now makes the force main the sole means of obtaining an alternative treatment and disposal method that is necessary in order to continue providing wastewater service to its customers.

- Please refer Schedule F-7 of the Minimum Filing Requirements.
 - a. In the paragraph pertaining to the force main, the Utility states it "constructed a 12" force main, adequate to handle anticipated demand." Please explain the Utility's basis at that time for anticipating a demand of 1,000,000 gpd for the force main while negotiating a contract with Englewood Water District for a maximum capacity of 500,000 gpd.
 - **RESPONSE:** Please see response to No. 8 above. In addition, it should be understood that the EWD maximum capacity is on an annual average basis compared to the force main which must handle instantaneous peak flow conditions.
 - b. In the paragraph pertaining to the master lift station serving the force main, the Utility states it "constructed a receiving well for the master lift station adequate for total demand," and equipped it with "pumping capacity adequate for current demand and near term growth." Please provide the capacities, in gallons per day, of the receiving well constructed and the pumps installed in the master lift station.

RESPONSE: There are two 45-Hp pumps currently installed in the master lift station's wet well (receiving well), which provide 760 gpm of pumping capacity at peak flow conditions. The master lift station was designed for the operation of three 88-Hp pumps at buildout conditions, which would provide 1,850 gpm of pumping capacity. The receiving well is designed to house the three pumps in the ultimate configuration. When we refer to the receiving well, we are referring to the concrete structure or lift station wet well. According to the documents provided in response to questions 20-23 of the staff's second data request, the wet well cost comprises only \$139,920 of the total \$546,920 lift station contract. All other portions of this project cost are related to current and near term flow requirements.

Should you or Staff have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,

MARTIN S. FRIEDMAN

For the Firm

MSF/ Enclosures

cc: John Hoy (via email,)

Patrick Flynn (via email)

Suzanne Brownless, Esquire (via email)

Erik Sayler, Esquire (via email)

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Sandalhaven ERC's Yr End per CC&B Rpt 30

Year	ERC's				
2010	1,155				
2011	1,196				
2012	1,314				
2013	1,301				
2014	1,302				

Utilities, Inc. of Sandalhaven Docket No. 150102-SU October 13, 2015 Lift Station Roster

Lift		FP&I		_		Pumping
		Meter	Pump			Capacity
Station No.	Address/Location	Number	(hp)	Phase	Voltage	(gpm)
L/S SH-01	6811 PLACIDA RD @ FIDDLERS GREEN, PH. 2	KJ14780	5.0	3	240	35_
L/S SH-02	6800 PLACIDA RD @ FIDDLERS GREEN, PH. 1	AC83591	5.0	1_	240	
L/S SH-03	7070 PLACIDA RD @ LEVEROCK'S .	KJ15654	3.0	3	240	181
	6833 GASPARILLA PINES BLVD @ GOLDFINCH DR	KJ12429	3.0	3	240	41
L/S SH-05	6796 GASPARILLA @ WILDFLOWER VILLAGE	ACD1553	7.5	3	240	63
	6600 GASPARILLA @ GOLDEN TEE	ACD9841	5.0	1	240	75_
	9047A BANTRY BAY @ SHAMROCK SHORES	ACD8684	1.5	1_	240	<u> </u>
	9860 EAGLE PRESERVE DR @ EAGLES PRESERVE, PH. 1	AC74086	4.0	1_1_	240	•
L/S SH-09	10064 EAGLE PRESERVE DR @ EAGLES PRESERVE, PH. 2	KJ15653	3.0	3	240	*
L/S 5H-10	8600 ESTHER ST @ CAPE HAZE MARINA	AC74135	7.6	3	240	103
L/S SH-11	8501 PLACIDA RD @ CAPE HAZE PLAZA	KJJ6694	4.0	1	240	209
L/S SH-12	8581 AMBERJACK CIRCLE @ HAMMOCKS	KJ15642	10.0	3	240	190
L/S SH-13	8401 PLACID ROAD - MASTER L/S	KNL6465	45.0	3_	480	760

Notes:

1. As of 11/2/15, L/S 5H-04 pumps will be 35 Hp, 240V, 3-phase

2. • indicates pumping capacity is not documented.

CLAC by Type and Gaselfication

Company: MERFire lyte, of Seminiferents Combat Sh.: 400005-000 |Makes | Jack View Shall December 19, 2005 |Projection| The Print Del | Makes | 1 or Print Del | Makes | 2 or Projected | 12 Partie Palife Service Commission

Constitute Comment and Company

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Codel No. 189425-25 History Task Years Status: December JA, 1894

report to the said of the

Heater Sales Marie III

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COMMITHENT	ş	(gpd)	(apd)	190 operat								
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Additional Pro	spald Commitments:									Gueranteed Res. Paymon		
		9,880		52	Mo	68	12,920	66 57	10,830	Product UI promishly		
2 lots	Engles Preserve Sharmock Shores	11,400		60	Yes	57	70.830	45	8,550	8/12/95		
10 feta 15 leta	Cape Heze Marina, in bunicrapity	6,550		45	Yes	59	11,290 21,280	***	4,5,0	2/24/03		
io ioni (05 condes	Haciende Dei Mar, Under Coratr.	16,070		85	Yes	112 51	9,500	51	9,690	1/15/03		
ili recitat	Ship's Laman Hotal, no activity	9,600		51	Yes	31 234	44,460	85	16,150	10/1/04		
ia rauma 134 condat	Homercky at Cape Haze, under coastr.	48,050		. 253	Yes	257	5,260			3/31/05		
COTTON	Care Haze Plaza Addition, under constr.	5,260		28	Yes	254	50,160	120	22,800	2/24/06		
54 acts	Cape Haza Resport-under constr.	\$8,340		297	Yes	873	185,800	426	80,940			
	SUBJUTAL 2004	165,150		659		8.3	шэноо		- •			
					Yes	418	79.420	415	29,040	W11/06		
122 condes	8401 Piscida Road-under design	84,400		414	140	1,391	245,220	842	159,980			
	Total Propeld Commitments through 2006	249,550	239,640	1,313		4,474	,013,211			-		
	Proposid Composituaceus added after 2004					26	4,922	26	4,940	16/19/00		
	Placide Maze				Yes	40	619	3	570			
	Egret Red estate				Yes	29	5,541	29	5,510			
		•				1,320	250,761	671	155,490	<u>.</u>		
	Total Prepaid Commitments						373,262	J				
	Total Capacity Committed Including flows divert	ed hose wate				•						

Reprinted AUG 07 2012

June 26, 2007

Mr. Patrick Flynn Regional Director Utilities, Inc. of Sandalhaven 200 Weathersfield Avenue Altamonte Springs, FL 32714



101 North Woodland Blvd. Suite 600 DeLand, Florida 32720 Phone: 386.736.4142 Fax: 386.736.8412

www.cphengineers.com

RE: Sandalhaven Master Lift Station and Force Main Project Summary

Dear Mr. Flynn:

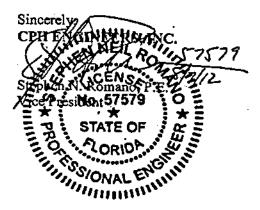
Pursuant to your request, this letter is intended to summarize the lift station and force main project recently completed in the Utilities, Inc. of Sandalhaven's (Sandalhaven) service area. The lift station and force main were constructed to divert a portion of the Sandalhaven service area's flows to the Englewood Water District's (EWD) Wastewater Treatment Facility. Sandalhaven's current wastewater treatment facility is rated at 0.150 million gallons per day (MGD), and flows during peak season exceed 0.135 MGD. Instead of expanding the wastewater treatment facility to meet future growth requirements, Sandalhaven opted to install approximately three miles of 12-inch force main and construct a master lift station to divert flow to EWD.

As detailed in the Master Plan developed in 2004, the service area's flow at buildout is projected to be approximately 900,000 gallons per day (gpd). The new force main and master lift station were designed to deliver all of the flow from the southern portion of the service area. This ultimately equates to approximately 665,000 gpd (or 462 gallons per minute), about 70% of the total service area flow. To handle this expected flow, the lift station design must allow for a peaking factor of 4.0, yielding a flow rate of 2.660 MGD or 1,850 gpm. The lift station is set up as a triplex (three pump) station to ultimately pump the peak rate to the EWD wastewater facility. The pipeline was modeled to determine the most efficient pipeline size based on the need to produce velocity sufficient to carry solids through the pipe as well as well as meet the total head condition (pressure) on the pump. The 12-inch pipeline was selected because it reduces the head condition down to approximately 125 feet at 950 gpm, and 105 feet at 750 gpm. This equates to a power requirement of 88 Horsepower for each pump. Had a smaller pipe size been selected to maximize velocity through the pipeline in order to minimize solids deposition, the pump horsepower would have been significantly higher - an estimated 300 Horsepower. This would have drastically increased the operating cost of the station. This would also have required installation of a larger wet well and a larger emergency generator for backup power. Therefore, the smaller 10-inch pipeline was not considered feasible based on the increased pumping and power requirements compared to the relatively small gain in capital cost.

While the pump station was designed and sized for ultimate capacity, the project was constructed to meet the Utility's more immediate needs. Two 45 Horsepower pumps

were installed initially to provide an interim pumping capacity of 760 gpm or 1.0 MGD peak flow. This equates to an average daily flow rate of 0.275 MGD. The current flow generated by the existing customers in the southern portion of the Sandalhaven service area is estimated to be approximately 0.050 MGD. While this initial flow rate will require periodic maintenance of the pipeline due to possible solids deposition caused by low velocities, the low head condition made this interim size feasible and more cost effective.

If you bave any further questions or need any additional clarifications, please let me know. Thank you.



Kimley»Horn

October 9, 2015

Patrick Flynn Vice President Utilities Inc. of Sandalhaven 200 Weathersfield Ave Altamonte Springs, FL 32714

Re: Sandalhaven Master Lift Station and force main clarification

Patrick:

As requested, this letter is to provide a clarification of the June 26, 2007 Sandalhaven Master Lift Station and Force Main Project Summary letter. In the second paragraph of the letter the following was asserted:

"The 12-inch pipeline was selected because it reduces the head condition down to approximately 125 feet at 950 gpm, and 105 feet at 750 gpm. This equates to a power requirement of 88 Horsepower for each pump. Had a smaller pipe size been selected to maximize velocity through the pipeline in order to minimize solids deposition, the pump horsepower would have been significantly higher - an estimated 300 Horsepower.

The pump design points are associated with the specific pump curve for each pump. To achieve the peak design point of 1850 gpm, the design point with a 12-inch pipeline called for a triplex pump station with each pump's design point being at 950 gpm at 125 feet TDH. This yields three 86-Hp pumps, with two operating and one as a standby. This is a total of 176-Hp with two pumps operating. The reduction of the pipeline to a 10-inch increases the pump design point to 950 gpm at approximately 275 feet TDH. This yields e horsepower per pump of approximately 150-Hp for a total 300-Hp with two pumps operating.

The comparison made in the June 26, 2007 letter was based on two pumps operating with a rated horsepower of 176 as compared to 300, e 70% increase in required motor size.

I hope this clarification provides you with the information you needed. If you need any additional information please contact me any time.

Very truly yours, KIMLEY/HORN-AND ASSOCIATES, INC.

Stephen N. Romano, PE

Sr. Project Manager