Antonia Hover

From: Betty Leland on behalf of Office of Commissioner Graham
Sent: Friday, October 16, 2020 7:15 AM
To: Commissioner Correspondence
Subject: FW: Secondary Standard Workshop

Good Morning:

Please place this email in Docket #20200000.

Thanks.

Betty Leland, Executive Assistant to
Commissioner Art Graham
Florida Public Service Commission
bleland@psc.state.fl.us
(850) 413-6024

From: Gary Williams [mailto:Gary.Williams@frwa.net]
Sent: Thursday, October 15, 2020 4:33 PM
To: Patrick Flynn; Troy Rendell; Joe Kuhns; Marissa Ramos; Office of Commissioner Polmann; Office of Commissioner Graham
Cc: mike@fus1llc.com; JR Kelly; Chris Snow; Tom Ballinger; Marty Friedman; Kathryn Cowdery
Subject: RE: Secondary Standard Workshop

All,

Per Patrick's response I don't want to get too far in the weeds but would like to point out that both EPA and FDEP exempt and phase in rules for the smallest systems. For example, EPA in every recent rule has phased in compliance by system size. Most impact systems over 100,000 population the first year (large), 3300 to 99,999 the second year (medium) and less than 3300 (small) the third year if the regulation effects them at all. The recent AWIA and requirement for updated Vulnerability Assessment doesn't apply to systems below 3300 because of cost vs benefit/risk. At FDEP again most rules are phased in over time per various size utilities so the smaller systems can learn lessons and enjoy best implementation ideas from larger water utilities. An FDEP example of exempted smaller systems from regulations is that systems with 150 connections or 350 population are not required to have 2 wells, standby generation with automatic start up, etc. for cost containment. It is still recommended they have these but not required.

We here at FRWA hear/get calls from water utility customers—not sure if by referral by water utilities or customers find FRWA other ways—and we always hear, related to IOU/Private-for profit water utilities, why don't the owners just use part of their profits to fix my issue. They assume profit which we all know isn't the case on the smallest systems and many Class C water utilities.

Respectfully,

Gary

From: Patrick Flynn [mailto:Patrick.Flynn@uiwater.com]
Sent: Thursday, October 15, 2020 12:11 PM

To: Gary Williams <Gary.Williams@frwa.net>; Troy Rendell <trendell@uswatercorp.net>; Joe Kuhns <jkuhns@plurisusa.com>; mramos@psc.state.fl.us; Commissioner.Polmann@psc.state.fl.us; Commissioner.Graham@psc.state.fl.us
Cc: mike@fus1llc.com; kelly.jr@leg.state.fl.us; Chris Snow <chris.snow@uiwater.com>; Tom Ballinger <TBalling@psc.state.fl.us>; Marty Friedman <MFriedman@deanmead.com>; Kathryn Cowdery <kcowdery@psc.state.fl.us>
Subject: RE: Secondary Standard Workshop

To all,
I want to reiterate our appreciation for having the opportunity to provide input on this topic.

In response to the discussion about sample costs, I solicited a quote from a commercial lab regarding the cost to analyze the full set of secondary parameters. The quoted price was $150, which appears to be a standard rate, not a preferred customer rate. Therefore, it provides an accurate basis for understanding what the cost per system might be.

In my view, all utilities, and therefore all its customers, would be well served by the utility sampling from each distribution system annually to provide data that may inform the utility (and indirectly its customers) of whether water quality is degraded between the Point of Entry and the distribution system sample site. This is not a panacea for answering all complaints, but it shifts the discussion a bit to a more objective understanding. It may indicate issues arise from the source water, the piping system, or both, but in many cases it may clarify or separate perceived issues from factual ones. There may also be benefits in terms of enhancing system management, optimizing existing treatment methods, and focusing flushing or other maintenance efforts more effectively. As Marty mentioned, information is power.

The $150/sample is not an onerous cost to the utility, especially if it was passed through as an ongoing annual cost. At that rate, there is minimal impact to a monthly water bill. I believe the benefits would be significant, especially by offering data year over year to see how or if water quality is changing within the piping network. I appreciate Gary Williams' concern about impacts to Class C water systems, but in reality, customers in those system ought to have their concerns addressed no less ably than customers in Class A and B systems. Class C systems by virtue of having small customer bases in which to spread costs inherently have big challenges to meet customer and regulatory expectations while also maintaining a healthy financial structure. It seems to me the bar for water quality expectations should not be lowered simply because the system is small in size.

I look forward to further discussion on this matter.
Regards,
Patrick Flynn

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Sent: Thursday, October 15, 2020 7:40 AM
To: Troy Rendell <trendell@uswatercorp.net>; Joe Kuhns <jkuhns@plurisusa.com>; mramos@psc.state.fl.us; Commissioner.Polmann@psc.state.fl.us; Commissioner.Graham@psc.state.fl.us
Cc: mike@fus1llc.com; kelly.jr@leg.state.fl.us; Chris Snow <chris.snow@uiwater.com>; Patrick Flynn <Patrick.Flynn@uiwater.com>; Tom Ballinger <TBalling@psc.state.fl.us>; Marty Friedman <MFriedman@deanmead.com>; Kathryn Cowdery <kcowdery@psc.state.fl.us>
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Thank you for opportunity to participate and submit comments related to last week workshop. Best Regards, Gary