

DOCKET NO.: 951056-WS - [Palm Coast Utility Corporation]

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WITNESS: Direct Testimony of Karen Amaya, Appearing On Behalf of the Florida Public Service Commission

DATE FILED: May 31, 1996

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DOCUMENT NUMPER-DATE D6025 MAY 31 % FPSC-RECORDS/REPORTING

1	DIRECT TESTIMONY OF KAREN AMAYA
2	Q. What is your name and business address?
3	A. My name is Karen Amaya and my business address is 2540 Shumard Oak
4	Boulevard, Tallahassee, FL 32399.
5	Q. By whom are you employed and in what capacity?
6	A. I am employed by the Florida Public Service Commission (FPSC) as an
7	Engineer in the Division of Water and Wastewater.
8	Q. What is your educational background and work experience?
9	A. In December, 1992, I received a Bachelor of Science Degree in Electrical
10	Engineering from Florida State University. In October, 1994, I passed the
11	Fundamentals of Engineering earning recognition as an Engineer Intern.
12	Subsequent to earning my engineering degree, I began employment with the FPSC
13	in March, 1993 where I have worked as an engineer in the Division of Water and
14	Wastewater. I am responsible for reviewing and analyzing engineering issues
15	in utility rate applications, customer complaints and service availability
16	applications along with preparing recommendations to the Commission. As
17	needed, I participate in research projects, rulemaking, and making
18	presentations on industry issues.
19	Q. Have you ever testified before the FPSC?
20	A. No.
21	Q. What is the purpose of your testimony in this proceeding?
22	A. I am: (a) supporting an acceptable allowance for infiltration and
23	inflow, (b) recommending the inclusion of a three year margin reserve for
24	wastewater treatment plant and effluent disposal, 18 months margin reserve for
25	water treatment plant, source of supply, and high service pumping, 12 months

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1 margin reserve for lines, and no margin reserve for finished water storage, 2 in the calculation of used and useful, (c) providing used and useful 3 calculations and resulting percentages for specific plant components, and (d) 4 recommending the recognition of economies of scale through the use of a three 5 year margin reserve for wastewater treatment plant and effluent disposal 6 (excluding the effluent storage tank), and the allowance of 100% used and 7 useful for the membrane softening plant building.

8 Q. Are you relying on any specific resources in making your9 recommendations?

Currently, the Commission does not have rules which set out a 10 Yes. Α. 11 methodology for determining used and useful percentages. Commission staff, however, have been working with industry and the Department of Environmental 12 Protection (DEP) and in May, 1995 issued draft rules. I have incorporated 13 many of the formulas from staff's draft rules in determining the used and 14 useful percentages which I support. With respect to infiltration and inflow, 15 16 I have referred to EPA's Handbook entitled Sewer System Infrastructure <u>Analysis and Rehabilitation</u>, dated October, 1991. For information on 17 18 reclaimed effluent storage, I have referred to EPA's Handbook entitled 19 Guidelines for Water Reuse, dated September, 1992. (Please see Exh KAA-1 20 which is attached to my testimony.)

21 Q. What is an acceptable level of infiltration and inflow?

A. The Commission has allowed up to 500 gallons per day (gpd)/inch
diameter/mile of gravity main for infiltration; however, this allowance does
not include inflow. The EPA, in the referenced handbook, allows 40 gallons
per capita per day (gpcd) for total infiltration and inflow which is equal to

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50% of the base domestic flow of 80 gpcd prior to any flows being considered
 excessive. Based on these criteria, I believe the utility's proposal to use
 an allowance of 15% of their derived daily flows in determining wastewater
 demands is reasonable.

5 Q. What specific time periods are you suggesting for margin reserve in the6 used and useful calculations?

I agree with the utility's requested 18 month time period for margin 7 Α. 8 reserve for water source of supply and pumping. Further, I believe 18 months is also an appropriate margin reserve period for high service pumping and the 9 membrane softening treatment equipment. The membrane softening plant 10 structure is constructed so as to accommodate a build-out capacity of 6.0 11 million gallons per day (mgd); to expand capacity beyond the current 2.0 mgd, 12 the utility need only add membrane skids and associated pumping and piping. 13 Based on this, 18 months margin reserve should sufficiently allow for the 14 permitting and installation of one or more additional skids and associated 15 appurtenances. For water and wastewater mains, a one year margin reserve is 16 17 sufficient. I point out that most, if not all, mains are already constructed. As to wastewater treatment plant and effluent disposal, excluding the effluent 18 19 storage tank, I believe a three year margin reserve is appropriate. I believe that a three year margin reserve period for these components better 20 21 accommodates the time required for design, permitting, and construction of 22 Further, a three year margin reserve period for these components plant. allows the utility to build in larger increments of plant, thereby taking 23 advantage of economies of scale without unduly burdening existing customers 24 through higher rates. Since my calculations yield a 100% used and useful 25

1	percentage for finished water storage, no margin reserve period for this
2	component is necessary nor appropriate.
3	Q. For the utility's water facilities, what specific used and useful
4	percentages do you support?
5	A. With the exception of the membrane concentrate line and blend station,
6	the following used and useful percentages are appropriate for the water
7	facilities:
8	- source of supply and pumping, 64.71% used and useful
9	- high service pumping, 74.99% used and useful
10	- lime softening treatment equipment, 100% used and useful
11	- membrane softening treatment equipment, 34.46% used and useful
12	- both water treatment structures, 100% used and useful
13	- finished water storage, 100% used and useful
14	- distribution mains, 23.49% used and useful
15	- off-site, transmission mains, 72.46% used and useful
16	- services, 72.40% used and useful
17	- fire hydrants, 94.8% used and useful (as requested)
18	Since discovery pertaining to the capacity and costs of the concentrate
19	line and blend station is still pending, I cannot provide a specific used and
20	useful percentage at this time. If the current concentrate blend station is
21	sized for the build-out capacity of the membrane softening plant, a used and
22	useful adjustment may be appropriate. However, if that is the case, the
23	minimum investment which would have been necessary to construct a smaller
24	capacity blend station to meet current demands should be compared with the
25	investment the utility has made constructing the current blend station and any

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subsequent used and useful adjustment should not result in a lower percentage 1 2 of investment in plant than that which would have been necessary for the 3 smaller capacity blend station. 4 0. For the utility's wastewater facilities, what used and useful 5 percentages do you support? 6 The following used and useful percentages are appropriate for the Α. 7 utility's wastewater facilities: 8 wastewater treatment equipment, 51.41% used and useful 9 effluent disposal facilities, excluding effluent storage tank. 10 56.66% used and useful effluent storage tank, 40.00% used and useful 11 gravity mains, 34.47% used and useful 12 13 pretreatment effluent pumping system (PEP) mains, 6.33% used and useful 14 PEP tanks, 100% used and useful (as requested) 15 pumping plant, 29.75% used and useful 16 17 force mains, 58.52% used and useful The used and useful calculations along with growth and capacity data are 18 attached to my testimony as Exh KAA-2. 19 20 Q. Would you describe each calculation, justification for the methodology employed, and the resulting used and useful percentage you have calculated for 21 each of the above components? 22 23 Α. Yes. To begin, I have utilized the historical ERC data provided by the 24 utility and have run regression analysis on both water and wastewater data to derive growth projections. For the most part, my growth projection numbers 25

match the utility's projections. For comparative purposes, I have projected
 flows and used and useful percentages for different margin reserve periods,
 including no margin reserve, on Exh KAA-2; however, the used and useful
 percentage I support and recommend has been shaded.

5 For water source of supply and pumping (excluding high service pumping), 6 I believe the utility appropriately reduced total well capacity by deducting the membrane concentrate amount of 353,000 gallons. However, I believe only 7 two maximum wells from the lime softening well supply and one maximum well 8 from the membrane softening well supply should be removed in addition to the 9 10 concentrate amount in determining the firm reliable capacity for source of 11 supply. Using this methodology, a firm reliable well field capacity of 8,176,120 gpd is calculated. Given the 18 months margin reserve requested by 12 13 the utility, the resulting used and useful percentage is 64.71%.

14 Although the utility did not calculate the used and useful percentage 15 for high service pumping equipment, I believe it would be appropriate to do 16 so. However, the break-out of investment between well pumps, backwash pumps, 17 transfer pumps, and high service pumps, if in fact the utility has booked all 18 these costs in NARUC Account 311, may not be possible. The utility has 19 applied the one used and useful percentage calculated for source of supply and pumping to this account. I have calculated used and useful for high service 20 pumping utilizing the two methodologies in the draft rules and the resulting 21 22 used and useful percentages are lower than that requested by the utility for 23 source of supply. If the investment in high service pumping can be 24 determined, then I believe the used and useful percentage I calculated should be applied to that investment. 25

The lime softening treatment plant was found to be 100% used and useful 1 2 in the last rate proceeding, and no expansion was made since that time. It 3 is important to note that the Commission included a fire flow allowance in 4 determining the 100% used and useful for the lime softening treatment plant 5 in the last rate proceeding. There is storage available at both plant sites. along with two elevated storage tanks within the service territory, all of 6 which can accommodate fire flow. This 100% used and useful percentage applies 7 to both the structures and improvements and to water treatment equipment for 8 9 this plant.

10 The next used and useful calculation I performed was on the membrane softening treatment equipment. Since the lime softening plant is 100% used 11 and useful, I reduced the projected customer maximum day demand, plus the 12 600,000 gallon fire flow allowance authorized in the last rate proceeding, by 13 the 5,202,000 gallons produced at the lime softening plant. The remaining 14 flows were then used to calculate used and useful for the membrane softening 15 treatment equipment. Given the 18 month margin reserve period previously 16 17 discussed, I believe the membrane softening treatment equipment is 34.46% used and useful. I believe that it was prudent and in the interest of economies 18 of scale for the utility to have constructed the build-out capacity for the 19 20 membrane softening plant structure. Therefore, I believe this structure is 100% used and useful. 21

To calculate the used and useful percentage for finished water storage, I first determined the firm reliable capacity. Since elevated storage does not have "dead" storage, I deducted 10% dead storage from the ground storage tanks only. I then added the capacity of the two elevated tanks to achieve

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a firm reliable storage capacity of 3,850,000 gallons. Using the draft rules,
 I allowed equalization and emergency storage, which is 0.75 of the maximum day
 demand, and added fire flow. That resulting demand compared to firm reliable
 capacity yields a capacity greater than 100%. Since it is not possible to
 utilize more than 100%, I am supporting 100% used and useful.

6 For determining used and useful on the distribution mains, I utilized 7 the information contained on the utility's water system maps. The maps 8 provide the number of occupied lots and the number of total lots; these 9 numbers exclude beach side and Hammock Dunes. By summing the appropriate 10 numbers, adding a one year margin reserve, the result is 23.49% used and 11 useful. I believe it is appropriate to compare lots connected to lots 12 available, not ERCs connected to lots available. It would be necessary to 13 either convert the number of lots available to ERCs to compare to ERCs connected, or, compare lots connected to lots available in order to compare 14 "apples to apples." 15

Similarly, for services, I have used lots connected with a one year
margin reserve, to services available to derive 72.40% used and useful.

The Commission normally does not recognize a fire flow allowance in the used and useful calculations for mains. However, I point out that the Commission does not generally penalize a utility, either, for installing larger diameter mains which might be used to supply fire flow.

For "off-site" transmission mains, I utilized the utility's hydraulic equivalents which derived the number of lots served. I note that this is not a lots connected to lots available approach; however, the utility has been allowed to use this particular methodology in the last several rate

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proceedings and I do not think it appropriate at this time to change the
 methodology as a significant deduction to previously authorized rate base
 could occur. Further, with transmission mains, unlike distribution mains, in
 many cases no fewer could have been constructed to serve current customers.

5 For wastewater treatment equipment, the projected, derived, average 6 annual daily flow with margin reserve was compared to the total plant capacity 7 of 4 mgd. It is important to note that the average annual daily flow is the 8 correct flow demand to use in this case as the 4 mgd capacity was permitted 9 based on this flow design. To use any other flow demand in this case would 10 skew the ratio, resulting in a higher used and useful percentage.

For effluent disposal facilities, I have made two separate calculations. The first is for what I believe should be considered non-reuse disposal <u>for</u> <u>ratemaking purposes</u> in this instance. This includes the two spray fields and the two RIB sites. Again, the projected annual average daily flow demand with a three year margin reserve was compared to the total capacity of these four sites yielding 56.66% used and useful. Again, I point out that the DEP permitted capacity for these four sites is based on annual average daily flow.

For the effluent storage tank which, according to the utility's reuse 18 19 feasibility study, is used as wet weather storage for the spray fields, I have 20 taken the total capacity of the spray fields and looked at capacity needed 21 based on a required minimum of 3 days (Rule 62-610.414(2)(c), Florida 22 Administrative Code). This methodology results in 40.00% used and useful on 23 the effluent storage tank. Since the effluent storage tank is for wet weather 24 storage, as opposed to a buffer for peaks, I did not deduct dead storage from 25 the tank capacity. Margin reserve is not appropriate for this component in

that the spray field capacities do not change with changes in customer 1 2 demands. However, I believe that economies of scale should be considered for this component. In lieu of margin reserve, I believe that if the utility can 3 support the amount of investment that would have been required to construct 4 a 2.4 million gallon tank for effluent storage, that investment, at a minimum, 5 should be included in rate base. Of course, if that investment should prove 6 7 to be more than what the utility actually invested in the 6.0 million gallon tank, only the actual investment should be in rate base. 8

9 The wastewater collection system for Palm Coast Utility consists of four 10 components, and I have calculated separate used and useful percentages for 11 each component. The first component consists of the gravity mains. Again, 12 I have determined the number of lots connected from the system maps, but have 13 reduced that number by the number of connections using the PEP system. Including a one year margin reserve and comparing this number to the total 14 lots served by gravity mains yields 34.47% used and useful on the gravity 15 16 mains.

To calculate used and useful on the PEP mains, I took the number of PEP connections that the utility provided, included a one year margin reserve, and divided that number by the total PEP lots available. This results in 6.33% used and useful for the PEP mains. I agree with the utility proposed 100% used and useful for the PEP tanks.

The utility provided a detailed calculation for determining used and useful for pumping plant. I believe the utility's methodology is appropriate except for the use of a peaking factor of 3. In the last rate proceeding, the Commission allowed a peaking factor of 2, and absent justification, I do not believe this factor should be changed at this time. Therefore, I conducted
 a similar detailed calculation, however, I have used the peaking factor of 2.
 My calculations are attached in Exh KAA-3. This methodology results in 29.75%
 used and useful for pumping plant.

5 The last collection system component is force mains. Again, I followed the utility's methodology. However, since I believe the pumping plant used 6 7 and useful is 29.75%, this results in a different used and useful percentage 8 on the force mains. By following the utility's methodology, the pumping plant 9 used and useful percentage is used in determining the force mains used and useful percentage. Included in the detail in Exh KAA-2 are the force main 10 details which show the derivation of the 58.52% used and useful I support. 11 I point out that the major manifold footage for the 8" and 10" force mains in 12 13 my calculations differs from what the utility provides in its used and useful In the utility's response to the Office of Public Counsel's 14 analysis. document request number 3, two different numbers for the 8" and 10" force 15 mains are provided. I have used the hand written numbers in my analysis. 16 17 0. Do you have anything further to add? No. 18 Α. 19 20 21

22 23 24 25 United States Environmental Protection Agency

Technology Transfer

Office of Research and Development Cincinnati, OH 45268 EPA/625/6-91/030 October 1991



## Handbook

Exhibit KAA-1 (Page 1 of 4)

# Sewer System Infrastructure Analysis and Rehabilitation



### **CHAPTER 2**

#### **Regulatory Requirements**

#### 2.1 Historical Background

The Water Pollution Control Act Amendments (Public Law 92-500, October 18, 1972), require that the U.S. EPA construction grant applicants investigate the condition of their sewer systems. The grant cannot be approved unless it is documented that each sewer system discharging into such treatment works is not subject to "excessive infiltration and inflow." This requirement was implemented in the Rules and Regulations for Sewer Evaluation and Rehabilitation (40CFR35.927). In addition, I/I analysis and Sewer System Evaluation Surveys (SSES) were required to be conducted on a routine basis to document I/I, and also to indicate the most cost effective method of rehabilitation required to correct the sewer pipe and manhole structure damage.<sup>1</sup>

The *I*/I analysis should document the non-existence or possible existence of excessive *I*/I in each sewer system tributary to the treatment works. The analysis should identify the presence and type of *I*/I that exists in the sewer system including estimated flow rates. The following information should be evaluated and included:

- Estimated flow data at the treatment facility, all significant overflows and bypasses, and, if necessary, flows at key points within the sewer system
- Relationship of existing population and industrial contribution to flows in the sewer system
- Geographical and geological conditions which may affect the present and future flow rates or correction costs for the I/I
- A discussion of age, length, type, materials of construction and known physical conditions of the sewer system

The SSES should include a systematic examination of the sewer system to determine the specific locations, estimated flow rates, method of rehabilitation and cost of rehabilitation versus the cost of transportation and treatment for each defined source of infiltration and each defined source of inflow.<sup>1</sup> The results of the SSES should be summarized in a report that should include:<sup>2</sup>

- A justification for each sewer section cleaned and internally inspected
- A proposed rehabilitation program for the sewer system
   to eliminate all defined excessive VI

### 2.2 Summary of Applicable U.S. EPA and State Regulations

The following is a Summary of Federal and State Regulations and Guidelines for VI analysis and SSES applicable under the U.S. EPA construction grant program.<sup>1,3</sup>

The grant applicant must determine the I/I conditions in the sewer system by analyzing the preceding year's flow records from existing treatment plant and pump stations. For smaller systems where flow records may not be available, the grant applicant shall obtain flow data by conducting flow monitoring at a single point at the treatment plant during high groundwater periods and also during rainstorms. If there is a likelihood of excessive I/I in a portion of the collection system, it is desirable to monitor that portion separately. No further 1/1 analysis will be necessary if domestic wastewater plus non-excessive infiltration does not exceed 120 gallons per capita per day (apcd) during periods of high groundwater. The total daily flow during a storm should not exceed 275 good, and there should be no operational problems, such as surcharges, bypasses or poor treatment performance resulting from hydraulic overloading of the treatment works during storm events. The flow rate of 120 gpcd for infiltration analysis contains two flow components: 80 apcd of domestic base flow and 40 gpcd of non-excessive infiltration. This is a national average based on the results of a needs survey of 270 Standard Metropolitan Statistical Area Cities. Where the flow rate (domestic base flow and infiltration based on the highest 7 to 14 day average) does not significantly exceed 120 gpcd (in the range of 130 gpcd) the city may proceed with the treatment works design without further analysis. When infiltration significantly exceeds 120 gpcd, further evaluation of the sewer system must be performed to determine the possibility of excessive I/I through a cost effectiveness

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Environmental Protection Agency

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Exhibit KAA-1 (Page 3 of 4)

September 1992



### Manual

# Guidelines for Water Reuse

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DOCKET NO. 951056-WS PALM COAST UTILITY CORPORATION - USED AND USEFUL CALCULATIONS, WATER

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	TOTAL			
AVG VEAR ERC. HD FRC	FRC	Reore	enion Output	
1990 10275 265	10530	Constant	-1504458	
1991 10935 756	11694	Std Err of Y Est	129,8478	LIME SOFTENING PLANT
1992 11460 812	12272	R Souared	0.993391	CHILL CON TENTING FERT
1993 12447 1422	13869	No. of Observation	ns 6	CAPACITY 6 000 mod
1994 13229 1595	14827	Degrees of Freed	om 4	(in plant us 0.798 mod
1995 14029 817	14846	-	1	REL CAPY 5.202 mod
Projections	-	X Coefficient(s)	761.1143	
1995.5 14346 852	15198	Std Err of Coef.	31.03955	
1996.5 15107 922	2 16029			MEMBRANE SOFTENING PLANT
1997 15488 957	16445			
1998.5 16629 1062	2 17691			CAPACITY 2.000 mgd
2000.5 18151 1202	19353			(in plant us 0.000
				REL CAPY 2.000 mgd
USED AND USEFUL CALCULATIONS	PER DRAFT RULES - W	TER		
flarge water system with adequate stor	age]			
NO. OF ERCS, YEAR END 1995	15198	[TEST YEAR]		
NO OF ERCS, YEAR END 1996	16029	[1.0 YEAR MR]		
NO. OF ERCS, AVG. 1997	16445	[1.5 YEAR MR]	DISTRIBUTION MAINS (< 8° D	AMETER) - NOT BASED ON RULES
NO. OF ERCS, YEAR END 1998	17691	[3.0 YEAR MR]		
NO. OF ERCS, YEAR END 2000	19353	[6.0 YEAR MR]	LOTS CONNECTED, 10/95	10,415
			1 YR MARGIN	570
			LOTS CONNECTED W/1 YR N	IR 10,985
1995 MAX DAY DEMAND	4,890,000 and	[TEST YEAR]	LOTS AVAILABLE *	46,764
1996 YR END MAX DAY DEMAND	5,157,416 and	1.0 YEAR MRI	CALCULATED U/U W1 YR MR	23.49%
1997 MAX DAY DEMAND	5.291.124 apd	1.5 YEAR MR	CALCULATED U/U W1.5 YR N	IR 24.10%
1998 YR FND MAX DAY DEMAND	5.692.248 apd	3.0 YEAR MRI		
2000 YR END MAX DAY DEMAND	6 227 081 and	IS O YEAR MRI	These jobs do not include bea	ch side numbers counted on maps
		fore reserved		
REOLIBED FIRE FLOW	600 000 and			
	2 000 gpm		TRANSMISSION IOFF-SITE1 M	AINS (8" OR GREATER DIAMETER)
	2,000 <b>3</b> Pm			
			LOTS CONNECTED 10/95 **	34.651
SOURCE OF SUPPLY AND PLIMPING.			1 YR MARGIN	1 895
1005 TOTAL WELL CAPACITY	10 719 360 and		LOTS CONNECTED W/1 YR M	P 36 546
(less ME plant concentrate)	(353,000) and	(		<u>50,040</u>
(less mo part unit MC pippt)	(1 199 520) and		CALCH ATED MINA YE HE	
(less one max west, ino plant)	(1,189,520)gpd (990,720) and		CALCULATED UNITAL AND A	74 940 TA 3404
	8 176 120 apd		CALCOLATED OF THE TR	IN (9.9470
1990 WELL RELIABLE CAPACITY	8,176,120 gpd		This number is as filed by D	
	50 8194		The number is as ned by PC	
CALCULATED U/U W/U MR	UP.0170	1		
CALCULATED U/U WYT.0 TR MR	00000000000000000000000000000000000000			
CALCULATED U/U W/3.0 YR MR	09.02%	ł	DERVICED	
CALCULATED U/U W/5.0 TR MR	/0.10%			10.115
			A VE MARCINI	10,410
		HOD + FE	I TR MARGIN	5/0
HIGH SERVICE PUMPING	PTA PRC OF		EUTS CONNECTED W/T YR M	IN 10,960
1990 TOTAL PUMP CAPACITY	11,800 gpm	11,800 gpm	SERVICES AVAILABLE	10,1/2
FIRM RELIABLE CAPACITY	9,800 gpm	a,auu gpm	CALCOLATED U/U W1 YR MR	10 74 000
95 PK HR DEMAND (2" MDD)	6,792 gpm		CALCULATED U/U W1.5 YR N	IK 74.28%
95 MAX DAY DEMAND		3,396 gpm	L	
CALCULATED U/U WO MR	69.30%	55.06%		
CALCULATED U/U W/1.5 YR MR	74.99%	57.90%		
CALCULATED U/U W/3.0 YR MR	80.67%	60.74%		
CALCULATED U/U W/5.0 YR MR	88.25%	64.53%		
WATER TREATMENT PLANTS				
LIME SOFTENING PLANT	100.00% [from ias	t rate proceeding w/FF]		
		1		
MEMBRANE SOFTENING PLANT				
RELIABLE CAPACITY	2,000,000 gpd	ļ		
CALCULATED U/U WO MR	14.40%			
CALCULATED U/U W/1.5 YR MR	34.46%			
CALCULATED U/U W/3.0 YR MR	54.51%			
CALCULATED U/U W/5.0 YR MR	81.25%			
F				
FINISHED WATER STORAGE				
TOTAL GST CAPACITY	3.000.000			
KLESS DEAD STORAGE OF 10%)	(300.000)			
FIRM RELIABLE GST CAPACITY	2 700 000			
	1 150 000			
TOTAL DELIABLE TANK CADY	3 850 000			
TOTAL RELIABLE TANK CAPT	3,000,000	a site		
CALCULATED OU WO MK	110.04% = 100%	1971		
MR NOT NECESSART DUE TO 100%				

### DOCKET NO. 951056-WS PALM COAST UTILITY CORPORATION - USED AND USEFUL CALCULATIONS, WASTEWATER EXHIBIT KAA-2 (Page 2 of 3)

	IOTAL
AVG. YEAR	ERCs
1990	8820
1991	9682
1992	10140
1993	11053
1994	11842
1995	12435
Projections	
1995.5	12845
1996.5	13573
1997	13936
1998.5	15028
2000.5	16483

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Regress	ion Output:	
Constant	•	1439195
Std Err of Y Est	•	10.3086
R Squared	(	.994775
No. of Observations		6
Degrees of Freedom		4
X Coefficient(s)	727.6571	
Std Err of Coef.	26.3688	

NO. OF ERCS, YEAR END 199512845[TEST YEAR]NO OF ERCS, YEAR END 199613573[1.0 YEAR MFNO. OF ERCS, AVG. 199713936[1.5 YEAR MFNO. OF ERCS, YEAR END 199815028[3.0 YEAR MFNO. OF ERCS, YEAR END 200016483[5.0 YEAR MFAverage Sewage Flow Per ERC119.00 gpdAllowance for Infiltration/Inflow (15%)17.85 gpdTOTAL FLOWS PER ERC136.85 gpd1995 AVG DAILY FLOW, YR END1,757,834 gpd1996 AVG DAILY FLOW, YR END1,857,4141997 AVG DAILY FLOW, YR END1,857,4141998 AVG DAILY FLOW, YR END2,056,5741998 AVG DAILY FLOW, YR END2,056,5741900 AVG DAILY FLOW, YR END2,255,7342000 AVG DAILY FLOW, YR END2,255,734DCDD RECLAIMED WATER DEMANDS (Minimum)300,000 gpdDCDD RECLAIMED WATER DEMANDS (Maximum1,600,000 gpdMASTEWATER TREATMENT EQUIPMENT4,000,000 gpd	
NO. OF ERCS, YEAR END 1995         12845         [TEST YEAR]           NO OF ERCS, YEAR END 1996         13573         [1.0 YEAR MF]           NO. OF ERCS, AVG. 1997         13936         [1.5 YEAR MF]           NO. OF ERCS, YEAR END 1998         15028         [3.0 YEAR MF]           NO. OF ERCS, YEAR END 2000         16483         [5.0 YEAR MF]           Average Sewage Flow Per ERC         119.00 gpd         [1.5 YEAR]           Allowance for Infiltration/Inflow (15%)         17.85 gpd         [TEST YEAR]           1995 AVG DAILY FLOW, YR END         1,757,834 gpd         [TEST YEAR]           1996 AVG DAILY FLOW, YR END         1,857,414         [1.0 YEAR MR]           1997 AVG DAILY FLOW, YR END         1,857,414         [1.0 YEAR MR]           1998 AVG DAILY FLOW, YR END         2,056,574         [3.0 YEAR MR]           2000 AVG DAILY FLOW, YR END         2,255,734         [5.0 YEAR MR]           2000 AVG DAILY FLOW, YR END         2,255,734         [5.0 YEAR MR]           DCDD RECLAIMED WATER DEMANDS (Minimum)         300,000 gpd         [from Reuse Fe]           WASTEWATER TREATMENT EQUIPMENT         4,000,000 gpd         [from Reuse Fe]	
INO OF ERCS, YEAR END 199613573[1.0 YEAR MiNO. OF ERCS, AVG. 199713936[1.5 YEAR MiNO. OF ERCS, YEAR END 199815028[3.0 YEAR MiNO. OF ERCS, YEAR END 200016483[5.0 YEAR MiAverage Sewage Flow Per ERC119.00 gpdAllowance for Infiltration/Inflow (15%)17.85 gpdTOTAL FLOWS PER ERC136.85 gpd1995 AVG DAILY FLOW, YR END1,757,834 gpd1996 AVG DAILY FLOW, YR END1,857,4141997 AVG DAILY FLOW, YR END1,857,4141998 AVG DAILY FLOW, YR END2,056,5741998 AVG DAILY FLOW, YR END2,056,5741900 AVG DAILY FLOW, YR END2,255,73415.0 YEAR MR2000 AVG DAILY FLOW, YR END2,255,734DCDD RECLAIMED WATER DEMANDS (Minimum)300,000 gpdDCDD RECLAIMED WATER DEMANDS (Maximum1,600,000 gpdMASTEWATER TREATMENT EQUIPMENT4,000,000 gpd	
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NO. OF ERCS, YEAR END 199815028[3.0 YEAR MFNO. OF ERCS, YEAR END 200016483[5.0 YEAR MFAverage Sewage Flow Per ERC119.00 gpdAllowance for Infiltration/Inflow (15%)17.85 gpdTOTAL FLOWS PER ERC136.85 gpd1995 AVG DAILY FLOW, YR END1,757,834 gpd1996 AVG DAILY FLOW, YR END1,857,4141997 AVG DAILY FLOW, YR END1,857,4141998 AVG DAILY FLOW, YR END2,056,5741998 AVG DAILY FLOW, YR END2,056,5741900 AVG DAILY FLOW, YR END2,255,7341900 AVG DAILY FLOW, YR END2,255,7342000 AVG DAILY FLOW, YR END2,255,734DCDD RECLAIMED WATER DEMANDS (Minimum)300,000 gpdDCDD RECLAIMED WATER DEMANDS (Maximum1,600,000 gpdWASTEWATER TREATMENT EQUIPMENT4,000,000 gpd	ข้
NO. OF ERCS, YEAR END 2000       16483       [5.0 YEAR MF         Average Sewage Flow Per ERC       119.00 gpd         Allowance for Infiltration/Inflow (15%)       17.85 gpd         TOTAL FLOWS PER ERC       136.85 gpd         1995 AVG DAILY FLOW, YR END       1,757,834 gpd         1996 AVG DAILY FLOW, YR END       1,857,414         1997 AVG DAILY FLOW, YR END       1,857,414         1998 AVG DAILY FLOW, YR END       2,056,574         1998 AVG DAILY FLOW, YR END       2,255,734         2000 AVG DAILY FLOW, YR END       2,255,734         2000 AVG DAILY FLOW, YR END       2,255,734         2000 AVG DAILY FLOW, YR END       1,600,000 gpd         DCDD RECLAIMED WATER DEMANDS (Minimum)       300,000 gpd         MASTEWATER TREATMENT EQUIPMENT       4,000,000 gpd	a l
Average Sewage Flow Per ERC       119.00 gpd         Allowance for Infiltration/Inflow (15%)       17.85 gpd         TOTAL FLOWS PER ERC       136.85 gpd         1995 AVG DAILY FLOW, YR END       1,757,834 gpd         1996 AVG DAILY FLOW, YR END       1,857,414         1997 AVG DAILY FLOW, YR END       1,907,204         1998 AVG DAILY FLOW, YR END       2,056,574         1998 AVG DAILY FLOW, YR END       2,255,734         1900 AVG DAILY FLOW, YR END       2,255,734         DCDD RECLAIMED WATER DEMANDS (Minimum)       300,000 gpd         DCDD RECLAIMED WATER DEMANDS (Maximum       1,600,000 gpd         WASTEWATER TREATMENT EQUIPMENT       4,000,000 gpd	i
Allowance for Infiltration/Inflow (15%)       17.85 gpd         TOTAL FLOWS PER ERC       136.85 gpd         1995 AVG DAILY FLOW, YR END       1,757,834 gpd       [TEST YEAR]         1996 AVG DAILY FLOW, YR END       1,857,414       [1.0 YEAR MR         1997 AVG DAILY FLOW, YR END       1,907,204       [1.5 YEAR MR         1998 AVG DAILY FLOW, YR END       2,056,574       [3.0 YEAR MR         2000 AVG DAILY FLOW, YR END       2,255,734       [5.0 YEAR MR         DCDD RECLAIMED WATER DEMANDS (Minimum)       300,000 gpd       [from Reuse Fellow]         WASTEWATER TREATMENT EQUIPMENT       4,000,000 gpd       [from Reuse Fellow]	
TOTAL FLOWS PER ERC136.85 gpd1995 AVG DAILY FLOW, YR END1,757,834 gpd[TEST YEAR]1996 AVG DAILY FLOW, YR END1,857,414[1.0 YEAR MR1997 AVG DAILY FLOW1,907,204[1.5 YEAR MR1998 AVG DAILY FLOW, YR END2,056,574[3.0 YEAR MR2000 AVG DAILY FLOW, YR END2,255,734[5.0 YEAR MRDCDD RECLAIMED WATER DEMANDS (Minimum)300,000 gpd[from Reuse ForWASTEWATER TREATMENT EQUIPMENT4,000,000 gpd	
1995 AVG DAILY FLOW, YR END1,757,834 gpd[TEST YEAR]1996 AVG DAILY FLOW, YR END1,857,414[1.0 YEAR MR1997 AVG DAILY FLOW, YR END1,907,204[1.5 YEAR MR1998 AVG DAILY FLOW, YR END2,056,574[3.0 YEAR MR2000 AVG DAILY FLOW, YR END2,255,734[5.0 YEAR MRDCDD RECLAIMED WATER DEMANDS (Minimum)300,000 gpd[from Reuse FeWASTEWATER TREATMENT EQUIPMENT4,000,000 gpd	
1996 AVG DAILY FLOW, YR END       1,857,414       [1.0 YEAR MF         1997 AVG DAILY FLOW       1,907,204       [1.5 YEAR MF         1998 AVG DAILY FLOW, YR END       2,056,574       [3.0 YEAR MR         2000 AVG DAILY FLOW, YR END       2,255,734       [5.0 YEAR MR         DCDD RECLAIMED WATER DEMANDS (Minimum)       300,000 gpd       [from Reuse Fe         WASTEWATER TREATMENT EQUIPMENT       4,000,000 gpd       [from Reuse Fe	
1997 AVG DAILY FLOW       1,907,204       [1.5 YEAR MF         1998 AVG DAILY FLOW, YR END       2,056,574       [3.0 YEAR MR         2000 AVG DAILY FLOW, YR END       2,255,734       [5.0 YEAR MR         2000 AVG DAILY FLOW, YR END       2,255,734       [5.0 YEAR MR         DCDD RECLAIMED WATER DEMANDS (Minimum)       300,000 gpd       [from Reuse Fe         DCDD RECLAIMED WATER DEMANDS (Maximum       1,600,000 gpd       [from Reuse Fe         WASTEWATER TREATMENT EQUIPMENT       4,000,000 gpd       [from Reuse Fe	3
1998 AVG DAILY FLOW, YR END       2,056,574       [3.0 YEAR MR         2000 AVG DAILY FLOW, YR END       2,255,734       [5.0 YEAR MR         DCDD RECLAIMED WATER DEMANDS (Minimum)       300,000 gpd       [from Reuse For Reuse Fo	i
2000 AVG DAILY FLOW, YR END       2,255,734       [5.0 YEAR MR         DCDD RECLAIMED WATER DEMANDS (Minimum)       300,000 gpd       [from Reuse Fellow]         DCDD RECLAIMED WATER DEMANDS (Maximum 1,600,000 gpd       [from Reuse Fellow]         WASTEWATER TREATMENT EQUIPMENT       4,000,000 gpd	1
DCDD RECLAIMED WATER DEMANDS (Minimum)       300,000 gpd         DCDD RECLAIMED WATER DEMANDS (Maximum       1,600,000 gpd         WASTEWATER TREATMENT EQUIPMENT         PLANT CAPACITY       4,000,000 gpd	1
DCDD RECLAIMED WATER DEMANDS (Maximum 1,600,000 gpd [from Reuse File WASTEWATER TREATMENT EQUIPMENT PLANT CAPACITY 4,000,000 gpd	
WASTEWATER TREATMENT EQUIPMENT PLANT CAPACITY 4,000,000 gpd	asibility Study, p. 37]
PLANT CAPACITY 4,000,000 gpd	
CALCULATED U/U WO MR 43.95%	
CALCULATED U/U W/1.5 YR MR 47.68%	
CALCULATED U/U W/3.0 YR MR 51.41%	
CALCULATED U/U W/5.0 YR MR 56,39%	
NON-REUSE DISPOSAL FACILITIES	
SPRATFIELDS 800,000 gpd [per DEP perm	rt]
OLDER RIB SITE 1,300,000	
NEWER RIB SITE	
TOTAL NON-REUSE DISPOSAL CAPACITY 3,100,000 gpd	
CALCULATED U/U WO MR 47.03% [flows adjusted to remove :	300,000
CALCULATED U/U W/1.5 YR MR 51.85% minimum to DCDD]	
CALCULATED U/U W/3.0 YR MR 56,66%	
CALCULATED U/U W/5.0 YR MR 63.09%	
NET WEATHER FACILITIES	
STORAGE TANK CAPACITY 6,000,000 gai	
SPRAY FIELDS CAPACITY, 3 DAYS 2,400,000	
[provides wet weather storage for spray fields, per Reuse Feas. Study, p. 28]	
ALCULATED U/U WO MR 60.00%	1

#### DOCKET NO. 951056-WS PALM COAST UTILITY CORPORATION - USED AND USEFUL CALCULATIONS, WASTEWATER

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EXHIBIT KAA-2 (Page 3 of 3)

OOLLOTIO	NSTSTEM	<u></u>	<u></u>				
	GRAVITY	MAINS					
LOTS CONN	ECTED, 10/9	5 *		9,456	-		
(LESS PEP	SYSTEM)			(1,281)	)		
<b>TOTAL GRA</b>	VITY LOTS C	ONNECTED		8,175	2		
ONE YEAR	MARGIN RES	ERVE (5.67%	5)	463			
TOTAL LOT	S CONNECTE	D W/1 YR M	Ŕ	8,638	-		
TOTAL LOT	S AVAILABLE			25,062			
CALCULATE	DU/UW/1Y	R MR		34.47%			
CALCULATE	:D U/U W/1.5	YR MR		35.39%			
' lots counted	d off system m	aps, beach si	de not inclu	ded			
		IS					
PEPs CONN	ECTED			1,281	-		
ONE YEAR I	MARGIN RES	ERVE		73	-		
TOTAL PEP	S CONNECTE	D		1,354	-		
TOTAL PEP	LOTS AVAILA	ABLE		21,376	_		
CALCULATE	D U/U W/1 YI	R MR		6.33%			
CALCULATE	D U/U W/1.5	YR MR		6.50%			
	PUMPING	PLANT					
COMBINED	CAPACITY OF	F PUMPING S	TATIONS	20,496	gpm		
COMBINED	PEAK DEMAN	ID, PKG FAC	TOR = 2	5,771			
ONE YEAR 🛚	WARGIN RESI	ERVE		327			
COMBINED	PEAK DEMAN	ID W/1 YR M	R	6,098			
CALCULATE	D U/U W/1 YF	RMR		29.75%			
CALCULATE	D U/U W/1.5	YR MR		30.55%			
	FORCE MA	INS					
		MAJOR	OTHER				
DIAMETER	TOTAL FT.	MANIFOLD	29.75%	TOTAL U/U	U/U %	FM COST	U/U AMT
	5,672	230	1,619	1,849	32.60%	\$34,340	\$11,195
1-		10.091	16,411	26,502	40.62%	\$636,382	\$258,471
1" 7"	65,250				E4 000/	A4 300 300	
1" 3" 1	65,250 127,975	39,420	26,347	65,767	51.39%	\$1,790,738	\$920,265
;" ;" ;0"	65,250 127,975 27,333	39,420 9,750	26,347 5,231	65,767 14,981	51.39% 54.81%	\$1,790,738 \$1,025,174	\$920,265 \$561,899
4" 5" 3" 10" 12"	65,250 127,975 27,333 26,073	39,420 9,750 19,032	26,347 5,231 2,095	65,767 14,981 21,127	54.81% 81.03%	\$1,790,738 \$1,025,174 \$848,161	\$920,265 \$561,899 \$687,261
4" 5" 3" 10" 2" 6"	65,250 127,975 27,333 26,073 7,343	39,420 9,750 19,032 7,343	26,347 5,231 2,095 0	65,767 14,981 21,127 7,343	51.39% 54.81% 81.03% 100.00%	\$1,790,738 \$1,025,174 \$848,161 \$235,746	\$920,265 \$561,899 \$687,261 \$235,746

EXH \_\_\_\_\_ KAA-3, (Page 1 of 2)

	Station	Conn	Lots Available	Flow	Gen. Serv.	Total	i&i ecrewoll&	Pk. Sew. Flow (2X)	Peak +	I&I (GPM)	Station Capacity	U&U Percent
1	23-1	106	955	12.614	dennione-roun	12.614	1.892	25.228	27,120	19	160	11.77%
2	32-1	30	900	3,570		3,570	536	7,140	7,676	5	150	3.55%
3	32-2	134	3337	15,946		15,946	2,392	31,892	34,284	24	225	10.58%
- 4	30-1	97	1257	11,543		11,543	1,731	23,086	24,817	17	270	6.38%
5	28-1	41	642	4,879		4,879	732	9,758	10,490	7	190	3.83%
6	29-1	82	1024	9,758		9,758	1,464	19,516	20,980	15	300	4.86%
7	29-2	36	757	4,522		4,522	678	9,044	9,722	7	200	3.38%
8	24-1	187	1509	22,253		22,253	3,338	44,506	47,844	33	200	16.61%
.9	26-1	230	2509	27,370		27,370	4,106	54,740	58,846	41	180	-22.70%
10	33-1	04	1360	9,990		9,890	1,499	19,992	21,491	15	1/5	8.53%
11	34-1	215	903	2,010	175 000	2,010	31 973	5,230 434 070	456 843	317	1/3	2.2370
12	34-2	315	4740	5 474	175,000	£ 12,400 5 474	31,0/3	424,970	11 769	317	-490	2 4 1 94
14	34-3	47	508	5 503		5 503	839	11 186	12 025	Å	330	2 53%
15	63.1	28	609	3 332		3 332	500	6 664	7 164	5	240	2.07%
16	63-2	34	659	4 046		4 046	607	8,092	8,699	ő	183	3.30%
17	64-1	59	557	7.021		7.021	1.053	14.042	15.095	10	125	8.39%
18	64-2	5	439	595		595	89	1,190	1,279	1	127	0.70%
19	65-1	30	496	3,570		3,570	536	7,140	7,676	5	129	4.13%
20	65-2	12	369	1,428		1,428	214	2,856	3,070	2	135	1.58%
21	19-1	1678	18719	199,682	175,000	374,682	56,202	749,364	805,566	559	405	138.13%
22	BB-1	27	38	3,213	2,306	5,519	828	11,038	11,866	8	20	41.20%
23	OK-1	0	32	0	20,733	20,733	3,110	41,466	44,576	31	200	15.48%
24	16-1	140	318	16,660		16,660	2,499	33,320	35,819	25	130	19.13%
25	9-1	666	3071	79,254		79,254	11,888	158,508	170,396	118	230	51.45%
26	BB-26	1117	4299	132,923		132,923	19,938	265,846	285,784	198	430	46.15%
27	BB-18	1320	4598	157,080		157,080	23,562	314,160	337,722	235	480	48.86%
28	BB-13	1822	5372	216,818	2,734	219,552	32,933	439,104	4/2,03/	328	640	51.22%
29	BV-1A	67	202	7,973		7,973	1,196	15,946	17,142	12	90	13.23%
30	BU-6	85	124	10,115		10,115	1,51/	20,230	21,747	15	60	25.17%
31	BL-8	130	140	10,184	20 422	10,184	2,420	502,300	34,790	24	30	80.55%
32	PS-B	2241	5037	200,079	29,433	230,112	5 026	70 016	84 942	4442 50	133	42.1176
33	14-1	664	1367	79.016		79.016	11 857	158 032	160 884	112	200	59.00%
35	4-2	743	1505	88 417	5 864	94 281	14 142	188 562	202 704	141	600	23.46%
36	PS.F	1100	1984	130,900	7 926	138 826	20 824	277 652	298 476	207	400	51 82%
37	PS-C	357	479	42 483	7,020	42 483	6 372	84,966	91.338	63	300	21 14%
38	PS-D	1126	2028	133 994	16 274	150 268	22 540	300,536	323.076	224	231	97 12%
39	AA-18	6	6	714		714	107	1,428	1,535		20	5.33%
40	AA-12	29	29	3.451		3,451	518	6,902	7,420	5	260	1.98%
41	AG-13	77	89	9,163		9,163	1,374	18,326	19,700	14	56	24.43%
42	AG-5	126	138	14,994	1,512	16,506	2,476	33,012	35,488	25	56	44.01%
43	AQ-3	57	57	6,783		6,783	1,017	13,566	14,583	10	21	48.23%
44	AA-8	322	334	38,318	1,512	39,830	5,975	79,660	85,635	59	310	19.18%
45	AU-5	36	39	4,284		4,284	643	8,568	9,211	6	186	3.44%
46	AA-5	439	459	52,241	1,512	53,753	8,063	107,506	115,569	80	350	22.93%
47	PS-A	458	481	54,502	2,919	57,421	8,613	114,842	123,455	86	300	28.58%
48	GH-6	378	378	44,982		44,982	6,747	89,964	96,711	67	166	40.46%
49	GG-7A	431	443	51,289		51,289	7,693	102,578	110,271	77	166	46.13%
50	GJ-5A	132	132	15,708		15,708	2,356	31,416	33,772	23	125	18.76%
51	PS-G	660	672	78,540		78,540	11,781	157,080	168,861	117	350	33.50%
52	11-2	292	963	34,748		34,748	5,212	69,496	74,708	52	230	22.56%
53	11-1	618	1453	73,542		/3,542	11,031	147,084	158,115	110	270	40.67%
54	PS-K	0	0	0	4,063	4,063	609	8,126	8,735	6	280	2.17%
30	OK-1	Ŭ,	0	Ŭ	12,503	12,503	1,5/3	20,000	20,001	18 - 19 - 1 <b>9</b> - 1 <b>9</b> - 19	310	6.U2%
20	F.R.P.	0	0	ů.	10,003	10,603	1,090	21,200	22,190	10	103	10.3/76
50	DE W	ŏ	58	Ň	203	203	30	406	436	Ň	200	0.1776
50	FG-W	70	403	8 3 3 0	3 711	12 041	1.806	24 082	25 888	18	175	10.00%
ŝ	FF-21	166	787	19 754	5 712	25 466	3 820	50 932	54 752	38	290	13 114
61	FD-2	43	191	5.117	-,	5.117	768	10.234	11.002	8	136	5.62%
62	FF-11	43	137	5.117		5,117	768	10.234	11.002	8	125	6.11%
63	FF-11A	364	1497	43,316	5,712	49.028	7.354	98,056	105,410	73	500	14.64%
64	39-1	416	1739	49,504	5,712	55,216	8,282	110,432	118,714	82	275	29.98%
65	37-3	17	805	2,023		2,023	303	4,046	4,349	З	180	1.68%
66	37-2	30	595	3,570		3,570	536	7,140	7,676	5	237	2.25%
67	37-1	23	664	2,737		2,737	411	5,474	5,885	4	237	1.72%
68	35-4	98	1309	11,662		11,662	1,749	23,324	25,073	17	250	6.96%
69	35-3	65	694	7,735		7,735	1,160	15,470	16,630	12	225	5.13%
70	35-2	61	79	7,259		7,259	1,089	14,518	15,607	11	180	6.02%
71	35-1	_51	523	6,069		6,069	910	12,138	13,048	9	280	3.24%
72	12-1	243	878	28,917		28,917	4,338	57,834	62,172	43	190	22.72%
73	13-3	853	7053	101,507		101,507	15,226	203,014	218,240	152	138	109.82%
74	13-2	933	7179	111,027		111,027	16,654	222,054	238,708	166	138	120.12%
75	13-4	130	415	15,470		15,470	2,321	30,940	33,261	23	130	17.77%
/6	13-5	50	308	0,900	//6	0,720	1,009	13,452	14,401	10	200	5.02%
11	IP-3	ů,	U N	v v	13/	13/	21	2/4	290	0	100	0.14%
70	10.2	0	5	0	7,040 5,964	9,040 5,864	121	3,030 11700	12 609	6	400	1.017a 7 2.042
80	12.1	1173	7977	139 587	13 160	152 747	22 012	305 494	328 406	228	530	43 034
81	27.1	156	300	18 564	10,100	18 564	2 785	37 128	39 013	220	115	24 10%
82	21-1	406	923	48,314		48 314	7 247	96 628	103 875	72	82	87 97%
83	22-4	173	553	20,587		20 587	3.088	41.174	44.262	31	100	30.74%
84	22-1	516	1200	61,404		61.404	9.211	122.808	132.019	92	116	79.03%
85	22-3	93	404	11,067		11,067	1,660	22,134	23,794	17	120	13.77%

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EXH \_\_\_\_\_ KAA-3, (Page 2 of 2)

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Station		Lots			Gen. Serv.	Total	181	Pk. Sew.	Peak + 1&I		Station	U&U
		Conn.	Available	Flow	&Multi-fam	Flow	Allowance	Flow (2X)	(GPD)	(GPM)	Capacity	Percent
86	22-2	852	2010	101,388		101,388	15,208	202,776	217,984	151	80	189.22%
87	20-1	1540	3298	183,260		183,260	27,489	366,520	394,009	274	321	85.24%
88	20-3	19	90	2,261		2,261	339	4,522	4,861	3	210	1.61%
89	20-2	254	31	30,226		30,226	4,534	60,452	64,986	45	194	23.26%
		28, 147	122,687	3,349,493	516,012	3,865,505	579,826	7,731,010	8,310,836	5,771	20,496	28.16%

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I&I Allowance 0.15 u/u % derived 28.16%

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