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August 31, 2000

VIA FEDERAL EXPRESS

ORIGINAL

Ms. Blanca Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Dear Ms. Bayo:

In response to the August 8, 2000, letter from Timothy Devlin in connection with the Application Regarding Service Availability Charges and Policies by United Water Florida Inc. for Duval, Nassau and St. Johns Counties, Florida, Docket No. 000610-WS, enclosed are an original and twenty (20) copies of Response to Deficiency Letter of August 8, 2000 ("Response").

I would appreciate your filling and distributing the enclosed copies of the Response in accordance with your established procedure.

If you have any questions or need additional information concerning this matter, please do not hesitate to call me.

Sincerely yours,

Scott G. Schildberg

SGS/arh
Enclosures

- APP _____
 - CAF _____
 - CMP _____
 - COM _____
 - CTR _____
 - ECR** _____
 - LEG _____
 - OPC _____
 - PAI _____
 - RGO _____
 - SEC _____
 - SER _____
 - OTH _____
- cc: Mr. Walton F. Hill
Mr. Jack Schreyer
Mr. Gary R. Moseley
Mr. Todd Mackey
Mr. David B. deNagy
Mr. John F. Guastella, Sr.
Mr. John Guastella, Jr.
Mr. Jason Fudge

2000 SEP - 1 10 11 AM
RECORDS & REPORTING DIVISION

DOCUMENT NUMBER-DATE
10903 SEP-18
FPSC-RECORDS/REPORTING

Application Regarding
Service Availability Charges
and Policies by United Water
Florida Inc. For Duval, Nassau
and St. Johns Counties, Florida
DOCKET NO.: 000610-WS
RESPONSE TO DEFICIENCY LETTER OF
AUGUST 8, 2000

DOCUMENT NUMBER-DATE

10903 SEP-18

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application Regarding)
Service Availability Charges)
and Policies by United Water) DOCKET NO.: 000610-WS
Florida Inc. For Duval, Nassau) DATE SUBMITTED FOR FILING:
and St. Johns Counties, Florida) August 31, 2000

RESPONSE TO DEFICIENCY LETTER OF AUGUST 8, 2000

United Water Florida Inc., a Florida corporation ("Applicant" or "United Water Florida"), by and through its undersigned attorneys, hereby files an original and twenty (20) copies of this Response to Deficiency Letter of August 8, 2000.

1. Item No. 1 of the Deficiency Letter of August 8, 2000, ("Deficiency Letter") states as follows:

Rule 25-30.565(4)(g), Florida Administrative Code, requires "[a] schedule showing the number of active customers on line 90 days prior to the time of application by meter size by customer class, and the related equivalent residential connections (ERC) as defined by Rule 25-30.515(8)" (emphasis added). Exhibit G of your application refers to Schedules W-3 and S-3 as the sources of this information; however, these schedules do not show active customers by customer class (i.e. residential or commercial), as required by the rule.

2. In response to Item No.1, attached hereto as Schedules W-3A and S-3A are schedules showing active customers by customer class.

3. Item No. 2 of the Deficiency Letter states as follows:

Rule 25-30.564(4)(i), Florida Administrative Code, requires "[a] detailed statement defining the capacity of the distribution or collection system in terms of ERCs as used in developing the proposed service availability charges." Exhibit I of the application does not provide this information.

4. As noted in paragraph 6, page 3 of the Application Regarding Service Availability Charges and Policies for Duval, Nassau, and St. Johns Counties, Florida, and Petition for Approval of Regulatory Accounting Treatment by United Water Florida Inc. ("Application"), United Water Florida is not seeking to establish separate capacity charges for its water transmission and distribution facilities or its wastewater collection facilities. Additional contribution-in-aid-of-construction for water transmission and distribution facilities and wastewater collection facilities will be received from new customers based on the actual cost of such facilities. No specific charges on an ERC basis are being proposed by United Water Florida for the water transmission and distribution facilities and the wastewater collection facilities. No capacities of the water transmission and distribution facilities and the wastewater collection facilities in terms of ERCs were used to develop proposed capacity charges for such facilities. Therefore, the Application is not deficient regarding Rule 25-30.56(4)(i), Florida Administrative Code, since no such capacity information was used in developing charges in the Application and, accordingly, there is no such information to be

provided pursuant to Rule 25-30.565(4)(i), Florida Administrative Code.

Respectfully submitted,

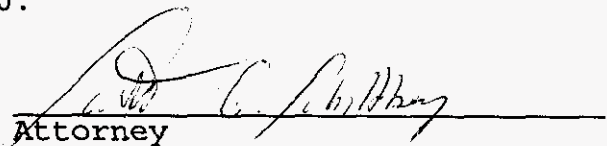
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and twenty (20) copies of the Response to Deficiency Letter of August 8, 2000, Inc. was furnished to Blanca Bayo, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, by Federal Express, this 31st day of August, 2000, and that a copy of the foregoing Response to Deficiency Letter of August 8, 2000, was furnished to Jason Fudge, Esquire, Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, by United States Mail, this 31st day of August, 2000.



Attorney

Calculation of Existing ERC's

Size	Meter								
	5/8"	3/4"	1"	1.5"	2"	3" D	3" T	4"	6"
ERC Factor	1	1.5	2.5	5	8	16	17.5	30	62.5

Systems	Meter Size	Dwelling Code				Total Customer	Total ERC's
		Residential	Multi-family	Commercial	Public Authority		
Arlington	5/8	5,769	4	240		6,013	6,013.0
	3/4	265	1	17		283	424.5
	1	33	15	63		111	277.5
	1 1/2		11	29	1	41	205.0
	2		44	21	5	70	560.0
	3		7	1	2	10	175.0
	4		7		1	8	240.0
ARL Total		6,067	89	371	9	6,536	7,895.0
Forest Brook	5/8	180		1		181	181.0
	3/4	2				2	3.0
	1 1/2			2		2	10.0
	2			1		1	8.0
FB Total		182	0	4	0	186	202.0
Holly Oaks	5/8	2,680		74		2,754	2,754.0
	3/4	746	3	20		769	1,153.5
	1	22	7	41	1	71	177.5
	1 1/2	1	1	13	2	17	85.0
	2		34	19	3	56	448.0
	3				1	1	17.5
4			1		1	30.0	
HO Total		3,449	46	167	7	3,669	4,665.5
Hyde Grove	5/8	341				341	341.0
	3/4	7				7	10.5
	1	5		2		7	17.5
	4		1		1	2	60.0
HG Total		353	1	2	1	357	429.0
Jacksonville Heights	5/8	3,146	2	212		3,360	3,360.0
	3/4	133	22	32		187	280.5
	1	3	3	72	1	79	197.5
	1 1/2		6	50		56	280.0

Calculation of Existing ERC's

Size	Meter								
	5/8"	3/4"	1"	1.5"	2"	3" D	3" T	4"	6"
ERC Factor	1	1.5	2.5	5	8	16	17.5	30	62.5

Systems	Meter Size	Dwelling Code				Total Customer	Total ERC's
		Residential	Multi-family	Commercial	Public Authority		
Jax Hts. (Con'd)	2		4	22	5	31	248.0
	3		2		1	3	52.5
	4		1		1	2	60.0
JH Total		3,282	40	388	8	3,718	4,478.5
Lake Forest	5/8	801		13		814	814.0
	3/4	6		2		8	12.0
	1	3		8		11	27.5
	1 1/2			2		2	10.0
	2			1	1	2	16.0
LF Total		810	0	26	1	837	879.5
Magnolia Gardens	5/8	664		10		674	674.0
	3/4	2				2	3.0
	1	1		6	1	8	20.0
	1 1/2			1		1	5.0
	2			1		1	8.0
	3			1		1	17.5
MG Total		667	0	19	1	687	727.5
Ortega Hills	5/8	432		1		433	433.0
	3/4			1		1	1.5
	3			1		1	17.5
OH Total		432	0	3	0	435	452.0
Ponce De Leon	5/8	474		10		484	484.0
	3/4	83		1		84	126.0
	1	30		1		31	77.5
	1 1/2	1				1	5.0
	2			2		2	16.0
PDL Total		588	0	14	0	602	708.5
Ponte Vedra	5/8	1,164		30		1,194	1,194.0
	3/4	103		23		126	189.0
	1	417	5	34		456	1,140.0

Calculation of Existing ERC's

Size	Meter								
	5/8"	3/4"	1"	1.5"	2"	3" D	3" T	4"	6"
ERC Factor	1	1.5	2.5	5	8	16	17.5	30	62.5

Systems	Meter Size	Dwelling Code				Total Customer	Total ERC's
		Residential	Multi-family	Commercial	Public Authority		
Ponte Vedra (Con'd)	1 1/2	20	15	35		70	350.0
	2		20	35		55	440.0
	3			5		5	87.5
	4			3		3	90.0
	6		1			1	62.5
PV Total		1,704	41	165	0	1,910	3,553.0
Royal Lakes	5/8	957	18	256		1,231	1,231.0
	3/4	248	16	98		362	543.0
	1	11	136	304	1	452	1,130.0
	1 1/2		458	214		672	3,360.0
	2		176	324	1	501	4,008.0
	3		4	52		56	980.0
	4		10	20		30	900.0
6		8			8	500.0	
RL Total		1,216	826	1,268	2	3,312	12,652.0
San Jose	5/8	3,493	12	77		3,582	3,582.0
	3/4	262		26		288	432.0
	1	209	33	40		282	705.0
	1 1/2	4	64	14		82	410.0
	2	2	18	29		49	392.0
	3		16	3		19	304.0
	4	2				2	60.0
6				2	2	125.0	
SJ Total		3,972	143	191	0	4,306	6,010.0
San Pablo	5/8	965	1	10		976	976.0
	3/4	429		15		444	666.0
	1	7		7		14	35.0
	1 1/2			4		4	20.0
	2			6		6	48.0
4					1	30.0	

Calculation of Existing ERC's

Size	Meter								
	5/8"	3/4"	1"	1.5"	2"	3" D	3" T	4"	6"
ERC Factor	1	1.5	2.5	5	8	16	17.5	30	62.5

Systems	Meter Size	Dwelling Code				Total Customer	Total ERC's
		Residential	Multi-family	Commercial	Public Authority		
San Pablo (Con'd)	6		2			2	125.0
SP Total		1,401	3	42	1	1,447	1,900.0
St. Johns North	5/8	1,448		9		1,457	1,457.0
	3/4	74		157		231	346.5
	1	142		19		161	402.5
	1 1/2			1		1	5.0
	2	6		3		9	72.0
	3			1	1	2	35.0
SJN Total		1,670	0	190	1	1,861	2,318.0
Venetia Terrace	5/8	243				243	243.0
VT Total		243	0	0	0	243	243.0
Yulee	5/8	180		21		201	201.0
	3/4	7		11		18	27.0
	1			14		14	35.0
	1 1/2			6		6	30.0
	2			12		12	96.0
	3			1		1	17.5
	4			1		1	30.0
Yulee Total		187	0	66	0	253	436.5
TOTAL		26,223	1,189	2,916	31	30,359	47,550.0

Systems Utilizing Outside Capacity:

Atlantic Utilities	5/8	715		43		758	758.0
	3/4	2		3		5	7.5
	1	1		5		6	15.0
	2			1		1	8.0
Atlantic Utilities Total		718	0	52	0	770	788.5
WATER TOTAL		26,941	1,189	2,968	31	31,129	48,338.5

Calculation of Existing ERC's

Size	Meter								
	5/8"	3/4"	1"	1.5"	2"	3" T	4"	6"	
ERC Factor	1	1.5	2.5	5	8	17.5	30	62.5	

Systems	Meter Size	Dwelling Code				Total Customer	Total ERC's
		Residential	Multi-family	Commercial	Public Authority		
Arlington	5/8	4,569	40	295		4,904	4,904.0
	3/4	302		43		345	517.5
	1	16	25	75	1	117	292.5
	1 1/2	3	18	39	1	61	305.0
	2		62	40	5	107	856.0
	3		11	9	3	23	402.5
	4		10	3		13	390.0
	6		1	1		2	125.0
ARL Total		4,890	167	505	10	5,572	7,792.5
Holly Oaks	5/8	1,996		49		2,045	2,045.0
	3/4	710		10		720	1,080.0
	1	7	1	14		22	55.0
	1 1/2		1	7		8	40.0
	2		34	13		47	376.0
	3					1	17.5
4			1		1	30.0	
HO Total		2,713	37	93	1	2,844	3,643.5
Hyde Grove	5/8	335				335	335.0
	3/4	1				1	1.5
	1	1		2		3	7.5
	2			1		1	8.0
	4			1	1	3	90.0
HG Total		337	1	4	1	343	442.0
Jacksonville Heights	5/8	3,144	2	96		3,242	3,242.0
	3/4	110	21	12		143	214.5
	1		3	27		30	75.0

Calculation of Existing ERC's

Size	Meter								
	5/8"	3/4"	1"	1.5"	2"	3" T	4"	6"	
ERC Factor	1	1.5	2.5	5	8	17.5	30	62.5	

Systems	Meter Size	Dwelling Code				Total Customer	Total ERC's
		Residential	Multi-family	Commercial	Public Authority		
Jax Hts. (Con'd)	1 1/2		6	20		26	130.0
	2		4	7	2	13	104.0
	3		2		1	3	52.5
	4		1		1	2	60.0
JH Total		3,254	39	162	4	3,459	3,878.0
Ortega Hills	5/8	438		1		439	439.0
	3/4			1		1	1.5
	3			1		1	17.5
OH Total		438	0	3	0	441	458.0
Ponce De Leon	5/8	269		4		273	273.0
	3/4	9				9	13.5
PDL Total		278	0	4	0	282	286.5
Ponte Vedra	5/8	896		14		910	910.0
	3/4	31		18		49	73.5
	1	104	5	16		125	312.5
	1 1/2	2	15	15		32	160.0
	2		20	19		39	312.0
	3			5		5	87.5
	4			2		2	60.0
PV Total		1,033	41	89	0	1,163	1,978.0
Royal Lakes	5/8	954	4	109		1,067	1,067.0
	3/4	244	8	35		287	430.5
	1	5	65	70		140	350.0
	1 1/2		216	63		279	1,395.0
	2		82	124	1	207	1,656.0

Calculation of Existing ERC's

Size	Meter								
	5/8"	3/4"	1"	1.5"	2"	3" T	4"	6"	
ERC Factor	1	1.5	2.5	5	8	17.5	30	62.5	

Systems	Meter Size	Dwelling Code				Total Customer	Total ERC's
		Residential	Multi-family	Commercial	Public Authority		
Royal Lakes (Con'd)	3		2	26		28	490.0
	4		5	10		15	450.0
	6		4			4	250.0
RL Total		1,203	386	437	1	2,027	6,088.5
San Jose	5/8	3,082	5	93	1	3,181	3,181.0
	3/4	148		33		181	271.5
	1	127	33	40		200	500.0
	1 1/2	1	62	30		93	465.0
	2	2	11	25	4	42	336.0
	3		16	1	2	19	332.5
	4			2		2	60.0
	6			3		3	187.5
SJ Total		3,360	127	227	7	3,721	5,333.5
San Pablo	5/8	791	1	3		795	795.0
	3/4	436		14		450	675.0
	1	4		4		8	20.0
	1 1/2			2		2	10.0
	2			5		5	40.0
	4				1	1	30.0
	6		2			2	125.0
SP Total		1,231	3	28	1	1,263	1,695.0
St. Johns North	5/8	1,378		1		1,379	1,379.0
	3/4	180		2		182	273.0
	1	113		6		119	297.5
	1 1/2			1		1	5.0
	2			3		3	24.0

Calculation of Existing ERC's

Size	Meter								
	5/8"	3/4"	1"	1.5"	2"	3" T	4"	6"	
ERC Factor	1	1.5	2.5	5	8	17.5	30	62.5	

Systems	Meter Size	Dwelling Code				Total Customer	Total ERC's
		Residential	Multi-family	Commercial	Public Authority		
SJN (Con'd)	3			1	1	2	35.0
SJN Total		1,671	0	14	1	1,686	2,013.5
Yulee	5/8	441		15		456	456.0
	3/4	7		16		23	34.5
	1			11		11	27.5
	1 1/2			4		4	20.0
	2			9		9	72.0
	3			2		2	35.0
Yulee Total		448	0	57	0	505	645.0
TOTAL		20,856	801	1,623	26	23,306	34,254.0

Systems Utilizing Outside Capacity:

Venetia Terrace	5/8	125				125	125.0
VT Total		125	0	0	0	125	125.0
Magnolia Gardens	5/8	691		9		700	700.0
	3/4	2				2	3.0
	1			5	1	6	15.0
	1 1/2			1		1	5.0
	2			1		1	8.0
	3				1	1	17.5
	4	1				1	30.0
MG Total		694	0	16	2	712	778.5
SEWER TOTAL		21,675	801	1,639	28	24,143	35,157.5