

Dorothy Menasco

From: jennifer.gillis@hklaw.com
Sent: Monday, November 07, 2011 4:27 PM
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Subject: 100330-WS - Electronic Filing

Attachments: Response to Motion to Strike.pdf

a. Person responsible for this electronic filing:

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b. Docket number and title for electronic filing are: Docket No. 100330-WS - In Re: Application for increase in water and 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.

c. The name of the party on whose behalf the document is filed: Aqua Utilities Florida, Inc. ("AUF").

d. Total number of pages: 25

e. Brief description of filing: AUF's RESPONSE TO OFFICE OF PUBLIC COUNSEL'S MOTION TO STRIKE SUPPLEMENTAL REBUTTAL TESTIMONY FILED BY AUF

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DOCUMENT NUMBER-DATE
 08231 NOV-7 =

11/7/2011

FPSC-COMMISSION CLERK

client or work product privilege that may be available to protect confidentiality.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and)
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: November 7, 2011

**RESPONSE TO OFFICE OF PUBLIC COUNSEL'S MOTION TO STRIKE
SUPPLEMENTAL REBUTTAL TESTIMONY FILED BY
AQUA UTILITIES FLORIDA, INC.**

Aqua Utilities Florida, Inc. ("AUF"), hereby responds to the Motion to Strike AUF's November 3, 2011 Supplemental Rebuttal Testimony filed by the Office of Public Counsel ("OPC") on November 4, 2011. Because OPC's Motion to Strike is wholly lacking any factual or legal support, it should be denied. In support hereof, AUF states:

AUF's November 3, 2011 Supplemental Rebuttal Testimony (the "November 3 filing") provides detailed responses to customer testimony at the customer service hearings held in this case. The record in this case demonstrates that the November 3 filing was expressly recognized by the Commission on the record and in Order, and discussed on the record of the customer service hearings on at least 13 occasions prior to the November 3 filing.

First, the November 3 filing was made at the direct request of Commission Staff. At the first customer service hearing held in this proceeding—the Greenacres Service Hearing, held on August 29, 2011—Commission Staff requested that AUF late-file its "response to the sworn customer testimony that is going to be heard at this and the other service hearings" on "November 3rd." (*See* Greenacres Service Hearing Tr., at 5-6 (attached as Exhibit "A").) Staff's request was approved by Chairman Graham at that hearing. (*Id.*)

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Second, that AUF would be making such a November 3 filing was expressly memorialized by the Prehearing Officer in Order No. PSC-11-0504-PCO-WS, dated October 27, 2011, which states:

. . . I note that we just completed ten customer service hearings, one each at Greenacres, Ft. Myers, Sebring, Oviedo, Gainesville, Palatka, Eustis, Chipley, New Port Richey, and Lakeland in which we heard from the customers. **AUF is scheduled to file its late-filed exhibit in response to this customer testimony on November 3, 2011.**

(Emphasis added.)

Furthermore, the record is replete with references to the November 3 filing. Composite Exhibit "B," attached hereto, contains transcript excerpts from customer service hearings held in Sebring, Oviedo, Palatka, Eustis, and Lakeland, which include such references to the November 3 filing. These repeated references make clear that the customers, the Commission, and the parties—including OPC—were well aware that AUF would be filing sworn testimony on November 3, 2011, in response to issues raised during the customer service hearings.

Because OPC's Motion to Strike is wholly without merit for lack of any factual or legal support, OPC has unnecessarily driven up rate case expense in this proceeding. Accordingly, AUF respectfully requests that the Commission deny OPC's Motion to Strike, and award any other relief the Commission deems appropriate.

Respectfully submitted this 7th day of November, 2011.

HOLLAND & KNIGHT LLP



D. Bruce May, Jr.

Florida Bar No. 354473

Gigi Rollini

Florida Bar No. 684491

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Attorneys for Aqua Utilities Florida, Inc.

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 7th day of November, 2011 to:

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Caroline Klancke
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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Pasco County Attorney's Office
8731 Citizens Drive, Suite 340
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St. Petersburg, Florida 33701



Attorney

EXHIBIT A

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 100330-WS

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.

PROCEEDINGS: GREENACRES SERVICE HEARING

COMMISSIONERS
PARTICIPATING: CHAIRMAN ART GRAHAM
COMMISSIONER LISA P. EDGAR

DATE: Monday, August 29, 2011
TIME: Commenced at 6:00 p.m.
Concluded at 8:17 p.m.

PLACE: Greenacres City Hall
City Commission Chambers
5800 Melaleuca Lane
Greenacres, Florida 33463

REPORTED BY: JANE FAUROT, RPR
Official FPSC Reporter
(850) 413-6734

DOCUMENT NUMBER-DATE

06528 SEP 12 =

FLORIDA PUBLIC SERVICE COMMISSION

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P R O C E E D I N G S

1
2 **CHAIRMAN GRAHAM:** Good evening, everyone.

3 (Audience response.)

4 Come on, you can do better than that. Good
5 evening. (Audience response.)

6 There you go. I want to welcome y'all here.
7 This is our first in a series of ten Aqua Utility
8 service hearings. For the record, my name is Art
9 Graham, and I'm currently the Chair at the PSC. I'm
10 joined with Commissioner Lisa Edgar.

11 And for the record, we want to make sure --
12 the date is Monday the 29th of August, 2011, and Docket
13 Number 100330.

14 With that all being said, Staff, I need you to
15 read the notice.

16 **MS. KLANCKE:** By notice, this time and place
17 has been set for a customer service hearing in Docket
18 100330-WS, application for increase in water and
19 wastewater rates in Alachua, Brevard, DeSoto, Hardee,
20 Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco,
21 Polk, Putnam, Seminole, Sumter, Volusia, and Washington
22 Counties by Aqua Utilities Florida, Inc.

23 **CHAIRMAN GRAHAM:** Any preliminary matters?

24 **MS. KLANCKE:** We have a few preliminary
25 matters with respect to the exhibits. In particular,

1 staff at this time would like to note that Exhibit
2 Number 1 has been reserved for Staff's Comprehensive
3 Exhibit List. This exhibit list will be addressed at
4 the hearing.

5 Item Number 2, staff would like to request to
6 be reserved for the late-filed utility response to the
7 sworn customer testimony that is going to be heard at
8 this and the other service hearings. In addition, staff
9 would like to note that this utility response will be
10 late-filed on November 3rd. If it is acceptable to you,
11 we can just label this as an exhibit named Utility
12 Response.

13 **CHAIRMAN GRAHAM:** Okay.

14 **MS. KLANCKE:** In addition, staff would like,
15 at this time, to enter the notice, which is a composite
16 exhibit containing the notices and affidavits with
17 respect to publication for the Greenacres, North Fort
18 Myers, Sebring, and Chuluota Service Hearings. We would
19 like to identify that as Exhibit Number 3. The exhibit
20 name, if it's acceptable, shall be specified as Notice
21 Composite Exhibit.

22 (Exhibit 3 marked for identification. Exhibit
23 Numbers 1 and 2 reserved.)

24 **CHAIRMAN GRAHAM:** All right. Is that all the
25 preliminary matters?

COMPOSITE EXHIBIT B

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 100330-WS

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.

PROCEEDINGS: SEBRING SERVICE HEARING

COMMISSIONERS
PARTICIPATING: COMMISSIONER LISA POLAK EDGAR
COMMISSIONER EDUARDO E. BALBIS
COMMISSIONER JULIE I. BROWN

DATE: Wednesday, August 31, 2011

TIME: Commenced at 10:00 a.m.
Concluded at 12:21 p.m.

PLACE: Highlands County Administration
Building
Board Chambers, Room B104
600 South Commerce Avenue
Sebring, Florida 33870

REPORTED BY: JANE FAUROT, RPR
Official FPSC Reporter
(850) 413-6732

DOCUMENT NUMBER-DATE

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1 get on a payment plan to pay the remainder, correct?

2 MR. MACERI: Yes.

3 MR. MAY: Thank you.

4 No further questions.

5 COMMISSIONER EDGAR: Commissioner Brown.

6 COMMISSIONER BROWN: Thank you.

7 Just a question for Mr. May regarding the fire
8 hydrants in the area and the lack thereof. Can you
9 explain that briefly?

10 MR. MAY: Commission Brown, I don't have that
11 information before you, but we are going to provide a
12 response to all the customers' testimony and file that
13 with a witness under oath on November -- I think it's
14 November 3rd, and so we will be sure to cover that issue
15 at that time.

16 COMMISSIONER BROWN: Thank you.

17 MR. MACERI: Thank you.

18 COMMISSIONER EDGAR: Thank you.

19 Ms. Christensen.

20 MS. CHRISTENSEN: The next customer we have
21 signed up to speak is Mr. David Bussey.

22 DAVID BUSSEY

23 appeared as a witness and, swearing to tell the truth,
24 testified as follows:

25 DIRECT STATEMENT

FLORIDA PUBLIC SERVICE COMMISSION

1 position to talk about them and advise the Commission if
2 things progress. But, you know, the policy of my
3 client, of Aqua Utilities is to have an open-door policy
4 and to discuss, you know, different potential solutions,
5 different potential transactions as they might arise.

6 **COMMISSIONER BROWN:** And my question is has
7 the utility received an offer from Pasco County to
8 purchase the system?

9 **MR. MAY:** No.

10 **COMMISSIONER BROWN:** Okay. Thank you.

11 **COMMISSIONER EDGAR:** Commissioner Balbis.

12 **COMMISSIONER BALBIS:** Thank you, Madam Chair.

13 I have a question for Mr. May. It's along the
14 same lines, although it has to do with a different area
15 that was addressed I believe it was Monday in a customer
16 service hearing. And can you update us on the Lake
17 Osborne Estates issue with Lake Worth Utilities,
18 because, again, those additional costs are passed on to
19 the --

20 **MR. MAY:** Absolutely. And, again, for fear of
21 testifying, I will give you -- I'm an attorney, so I
22 will give you kind of my understanding, and we will
23 certainly address this formally with a witness under
24 oath on November 3rd. But negotiations, discussions
25 with Lake Worth Utilities are ongoing. My client is

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 100330-WS

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.

PROCEEDINGS: OVIEDO SERVICE HEARING

COMMISSIONERS
PARTICIPATING: COMMISSIONER LISA POLAK EDGAR
COMMISSIONER EDUARDO E. BALBIS
COMMISSIONER JULIE I. BROWN

DATE: Thursday, September 1, 2011

TIME: Commenced at 10:13 a.m.
Concluded at 12:19 p.m.

PLACE: Canterbury Retreat & Conference
Center
1601 Alafaya Trail
Oviedo, Florida 32765

REPORTED BY: LINDA BOLES, RPR, CRR
Official FPSC Reporter
(850) 413-6734

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06725 SEP 19 =

FLORIDA PUBLIC SERVICE COMMISSION

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EXAMINATION

1

2 BY MR. MAY:

3

4 Q Ms. Lawrence, I'm Bruce May with the law firm
of Holland & Knight. We represent Aqua.

5

6 A Yes.

7

8 Q And I have just a couple of questions. We're
going to be filing a response to your testimony on
November 3rd of this year, so I want to make sure that
9 we have all the information correct before we do that.

10

11 A All right.

12

13 Q So, again, not trying to put you on the spot.

14

15 A No. That's all right.

16

17 Q I'm simply trying to get, get the facts.

18

19 You mentioned that you had a problem with a
bill and called a supervisor.

20

21 A I called to speak to a supervisor, requested
it.

22

23 Q And when was that call made, ma'am?

24

25 A It was probably October, November. And I told
you, I didn't write it down. All I know is it was about
that because the bill was so high.

26

27 Q October or November of 2010?

28

29 A Yes. That would be it, because we've only
been here since end of June last year.

30

31 Q And you also indicated that you had a leak

32

1 I'll be honest with you, because when I do call, I don't
2 get any service. So what happens is I wait to see if
3 the water gets better. If it gets better, then it, I
4 let it go until it happens again. And, you know, like I
5 was telling her, I will keep better records now because
6 I feel like somebody is listening and gonna pay
7 attention. It's just that it never quite goes away.

8 I did have one other thing, if you don't mind.
9 You mentioned something, some kind of filing, I hope I
10 heard right, November 3rd that has to do with Chuluota?

11 Q No, ma'am. I, I don't want to confuse you.
12 What we're going to be filing is testimony under oath
13 with the Commission responding to some of the concerns
14 that you all are identifying today. So that's one --
15 that's really the purpose of my question. Again, not to
16 put you on the spot. I'm trying to get the facts right
17 from our end so that we can provide the information to
18 the Commission.

19 A Okay. Well, the only thing I can tell you is
20 that my calls have been through, I would say the last
21 few years, even probably further back, and I get the
22 same exact answers and lack of follow-up no matter what.
23 It doesn't matter when I've called or what it's been
24 about, I always have to call back. And I feel like I
25 have to double back. And then when I do double back,

1 concerns, and actually drove out to their home, met
2 for -- I think it was several hours, wasn't it,
3 Ms. Castro?

4 MS. CASTRO: About an hour and a half, and
5 then she got really irritated and she left and said,
6 "We're not going anywhere with this." Because I was
7 literally in tears. And she said, "We'll just deal with
8 this later." And Tricia Williams is sitting on my
9 kitchen table rubbing her head like she's totally
10 annoyed for being there. Let's just throw that one in
11 too.

12 COMMISSIONER EDGAR: Okay. Thank you.
13 Mr. May, you did ask.

14 MR. MAY: I did.

15 MS. CASTRO: The truth hurts.

16 MR. MAY: We will, we will be supplying a
17 detailed response, but essentially the president of
18 Aqua, Ms. Wallingford at the time, and Ms. Tricia
19 Williams visited the home in an effort to address their
20 concerns. At that time there was a credit offered, and
21 also the Castros were placed on a payment plan, which is
22 not required by law and is not required by rules.
23 Again, we'll put that under oath in our filing on
24 November 3rd.

25 MS. CASTRO: I don't think I ever got

1 Commissioner Balbis?

2 **CHAIRMAN GRAHAM:** Yes.

3 **MR. MAY:** Commissioner Balbis, as is normally
4 the case with me, I've been advised by our engineer that
5 I left some information out and did not give you a
6 complete answer. And my apologies. I will kind of give
7 you a complete rundown of what's being done to address
8 the TTHM issues at the River Groves system.

9 The first action item that the company has
10 undertaken, it's lowered the tank levels. Second, it's
11 performed directional flushing. The third, it's lowered
12 the chlorine levels in the treatment system. And
13 fourth, more recently it's initiated automatic, excuse
14 me, automatic flushing of the system.

15 The company has met with Putnam County to
16 discuss interconnection. The company has also been in
17 constant communication with the Florida Department of
18 Environmental Protection. The company has also, in
19 addition to interconnection is looking at a new
20 treatment system using chloramines. All of that
21 information will be provided to the Commission and to
22 the customers in further detail under sworn testimony in
23 our filing on November 3rd.

24 **COMMISSIONER BALBIS:** Okay. Thank you.

25 **CHAIRMAN GRAHAM:** Once again, I want to thank

1 Q Mr. Denmark, thank you very much for coming
2 this evening. I'm Bruce May. I represent Aqua. We're
3 going to be filing a response to your testimony and some
4 of the other customers' testimony on November 3rd, so I
5 want to make sure I have all the information that I can
6 as accurate as I can.

7 You had indicated that you had contacted
8 customer service representatives of Aqua on several
9 occasions.

10 A Correct. And also let me state, every time I
11 made a complaint, my next month's bill was outrageous.
12 It shot up every time.

13 Q Can you -- I'm sorry. Can you tell me what
14 month and what day?

15 A I have called numerous times. I couldn't tell
16 you.

17 Q Can you give me a range as to what week of
18 what month that you called?

19 A Well, the most recent had to have been
20 probably two months ago when we got the huge bill. I
21 mean, I just found out five minutes ago that they can
22 pull the calls, so I'm --

23 Q Approximately what, what -- a couple of weeks
24 ago, you think?

25 A No. A couple of months ago.

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of:

DOCKET NO. 100330-WS

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.

_____ /

PROCEEDINGS: LAKELAND SERVICE HEARING

COMMISSIONERS
PARTICIPATING: COMMISSIONER RONALD A. BRISÉ
COMMISSIONER EDUARDO E. BALBIS
COMMISSIONER JULIE I. BROWN

DATE: Wednesday, October 12, 2011

TIME: Commenced at 10:00 a.m.
Concluded at 1:42 p.m.

PLACE: Magnolia Building
702 East Orange Street
Lakeland, Florida 33801

REPORTED BY: JANE FAUROT, RPR
Official FPSC Reporter
(850) 413-6732

DOCUMENT NUMBER
FLORIDA PUBLIC SERVICE COMMISSION 08033 NOV-1 =

FPSC-COMMISSION CLERK

1 plenty of opportunity, and I would really sincerely
2 would like to know why they have a lift station with no
3 alarm on it that will let them know when it is not
4 working. I think that is a very fair question to ask,
5 and I think everybody in this room would like to hear
6 Aqua answer that.

7 COMMISSIONER BRISÉ: And that is a question
8 that I think you can get an answer to right now.

9 MR. MILES: I can?

10 COMMISSIONER BRISÉ: Yes.

11 MR. MAY: We can get you an answer by
12 Ms. Williams, Patricia Williams, after you speak. But I
13 just wanted you to understand, we will be filing -- we
14 are filing testimony on this very subject on
15 October 27th and on November 3rd, so this is going to be
16 part of our testimony to explain on the record -- I can
17 talk now, but I would like to provide you with sworn
18 testimony exactly what Aqua does with respect to its
19 alarm system at its lift stations.

20 MR. MILES: Okay. Thank you.

21 Thank you very much.

22 MR. MAY: Thank you.

23 COMMISSIONER BRISÉ: We will enter your items
24 into the record.

25 MS. BENNETT: Composite Miles Number 44.

1 Any questions?

2 MR. MAY: Thank you, Mr. Leones, for speaking
3 today.

4 Just to follow up, I think you might have
5 heard, we are going to be filing some responsive
6 testimony on November 3rd, and we want to make sure our
7 records are as accurate as we can get them. You said
8 that you had some concerns and some problems when you
9 had contacted the call center regarding a drop in
10 pressure and you were treated rudely by the customer
11 service representative?

12 MR. LEONES: Absolutely.

13 MR. MAY: Do you recall the day and the month
14 that occurred?

15 MR. LEONES: It was last month.

16 Phyllis, what date was that? September 11th.
17 It was 9/11.

18 MR. MAY: Okay. Thank you, sir.

19 COMMISSIONER BRISÉ: Thank you.

20 MR. KELLY: Mr. Bowers will be followed by Ms.
21 Patricia Minor.

22 COMMISSIONER BRISÉ: Ms. Minor, you will have
23 to move forward. After Mr. Bowers, we're going to take
24 a ten-minute break for our court reporter to get a rest,
25 and we are going to probably switch court reporters at

1 **COMMISSIONER BRISÉ:** Okay. We'll ask if
2 someone could take a look at that podium for us.

3 (Podium locked into place.)

4 Okay. At this time -- Commissioner Brown
5 asked a question of the company, so at this time we're
6 going to give them the opportunity to answer.

7 **MR. MAY:** Thank you, Mr. Chairman. And,
8 Commissioner Brown, we've had an opportunity to consult
9 with our engineers and technical staff.

10 With respect to the piping improvements and
11 the additional piping in Polk County, as you heard,
12 throughout the county in many different situations one
13 of the most common is when there is a line break. The
14 lines at that time are repaired, replaced, and
15 refurbished. In addition, as Mr., Mr. Fox indicated at
16 the outset, there is a substantial infiltration, INI, a
17 project that was done in the Breeze Hill area that he
18 was referring to in his opening as far as pipe
19 replacement, line replacement, and refurbishments. We'd
20 be glad to provide some additional information on that
21 in our rebuttal testimony on November 3rd.

22 **COMMISSIONER BROWN:** That would be great.
23 Thank you.

24 **COMMISSIONER BRISÉ:** Thanks very much. I do
25 think at this time we do have some items that we need to

1 but I did not understand the answer that we got about
2 the upgrading pumps and replacing pipes.

3 COMMISSIONER BRISÉ: Say that again. I'm
4 sorry. Oh, you want the answer to be repeated about the
5 pumps?

6 MR. HINES: Right.

7 COMMISSIONER BRISÉ: And lift stations?

8 MR. HINES: Right.

9 COMMISSIONER BRISÉ: Okay. So I'll give the
10 company an opportunity to answer the question.

11 MR. MAY: Sure. And thank you for the
12 question. We'll be responding to this, to complete the
13 record, with sworn testimony on -- I think we'll be
14 filing it on November 3rd.

15 But just to give you the, kind of just a
16 summary, I think I mentioned earlier the question from
17 Commissioner Brown was what have you done with respect
18 to replacing lines and pipes? And when there's a line
19 break in any area in Polk County or any area where Aqua
20 serves, the company goes in and installs new lines to
21 repair the break, refurbish the line when necessary. As
22 far as the specific details of pump replacements, Ms.,
23 excuse me, Ms. Williams and Mr. Householder can walk you
24 through that, that aspect better than I can right now.

25 MR. HINES: Well, I don't believe that these

1 and I haven't seen the notice actually to be able to
2 comment on that. It may have been a typo. Maybe Aqua
3 can explain that.

4 COMMISSIONER BRISÉ: Thank you.

5 MR. HINES: All I know is hasn't anything
6 changed at Rosalie Oaks, so I just wondered why we got
7 moved. But I would like to know what Aqua has done at
8 Rosalie Oaks in the past year to deserve another
9 increase.

10 COMMISSIONER BRISÉ: I don't know if that's a
11 question that Aqua can answer at this time, but I'll
12 give you an opportunity to try.

13 MR. MAY: I mean, I can, I can give you in a
14 summary. We'll be providing more detail in our final
15 sworn testimony on November 3rd. But just for example
16 as far as capital improvements for the Rosalie Oaks
17 system, we've also moved, relocated a lift station, and
18 also we've added, I think, a systematic, automatic
19 flushers to the system in Rosalie Oaks. I think Mr.,
20 excuse me, I think Mr. Fox will address that in his
21 opening, and we'll be glad to provide more detail in the
22 sworn testimony on the 27th -- excuse me, the 3rd of
23 November.

24 MR. HINES: Did I understand you to say, did I
25 understand you to say that you moved the lift station?