THE WOODS UTILITY COMPANY

July 24, 2020

FILED 7/24/2020 DOCUMENT NO. 04016-2020 FPSC - COMMISSION CLERK

Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 20190125-WS - Application for staff-assisted rate case in Sumter County by The Woods Utility Company – Request for Extension to Comply with PAA Order

Dear Commission Clerk:

The Woods Utility Company (The Woods) hereby requests an extension of time to comply with the Commission's PAA Order. Order No. PSC-2020-0087-PAA-WS was issued on March 25, 2020. The Consummating Order No. PSC-2020-0151-CO-WS, was issued on May 14, 2020, making the PAA Order final.

However, it was unforeseen that the unprecedented COVID-19 pandemic was spreading to the United States during this time causing a shutdown to the State of Florida. To date, this COVID-19 pandemic continues.

The PAA Order stated:

Additionally, the Utility shall engage with its customers and with the Office of Public Counsel on its efforts to ameliorate the quality of its product. The Utility shall file status reports with this Commission detailing the actions it has taken to meet the DEP's requirements and its engagement efforts with its customers and with the Office of Public Counsel. The first status report shall be filed six months after the Final Order is issued in this Docket and every six months thereafter, until the additional monitoring is rescinded by the DEP.

Prior to these recent events of the pandemic, The Woods had developed a plan to begin the process of addressing the Commission's mandate. It should be noted that the Lead and Copper sampling requires samples to be taken <u>inside</u> customers' homes, as required by the FDEP. The Woods had planned to begin:

- Conducting a survey of customers' plumbing where the exceedances occurred to determine what type of internal piping existed, i.e. galvanized iron, solders, pvc, etc.
- Visit each home where the exceedance occurred to take the required sampling in person with the homeowner

The Woods Utility Company Request for Extension

Conduct further distribution samples

Due to these unforeseen circumstances, The Woods has not been able to move forward with this mandate to engage the Office of Public Counsel and customers. The Governor is still limiting group meetings to a limit of 50 people during the Phase II of the Plan for Florida's Recovery. (https://floridahealthcovid19.gov/plan-for-floridas-recovery/) In addition, individuals over the age of 65 are strongly encouraged to avoid crowds. The Woods does not believe it would be appropriate to meet with and go inside customers' homes at this time.

The Woods also has the understanding that the Governor has not lifted the travel ban on state government employees, making it further difficult to schedule a meeting with the OPC and customers.

The Woods intends to reach out to the OPC in order to coordinate future meetings and activities so its representatives can attend meetings between the utility and customers.

Recent Events Update

The Woods has taken the additional step recently to have the AquaGold manufacture representative come on-site a couple of times to meet with the operator to dial in the correct dosage of the sequesterant. This representative indicated the previous high results may have been caused by the initiation of the sequesting agent when it first was installed.

The Woods has shared this plan (above) with FDEP and has subsequently received permission to delay the in person contact due to the COVID-19 pandemic. The Woods recently completed the semi-annual testing in June 2020 (See Attached). In the most recent sampling event there remains two elevated lead results for the Woods, which will trigger the 90th %. Thus The Woods will be distributing the attached notice.

However, in the sampling conducted last August, the facility had six lead exceedances. Of those six addresses, four were sampled this time, all which were below the 0.015 limit.

Taking into consideration these difficult times, The Woods is requesting an extension of a minimum of an additional six months in order to comply with the FPSC Order. Thus the first status report would be due twelve months from the date of the Consummating Order and then every six months thereafter. The Woods agrees to provide any updates to any action that may take place before these timeframes if they occur.

The Woods Utility Company Request for Extension

If you have any questions, please do not hesitate to contact me at (727) 848-8292, ext. 245.

Respectfully,

Rendell 56

Troy Rendell Vice President Investor Owned Utilities // for The Woods Utility Company

Lead and Copper Tap Sample Analysis And Result Ranking Report

Reporting Format 62-550.730(4)(a)

LAB ID

System Name:					The W	loods Subdivision	Da	te Submitted to L	06/18/	06/18/2020 16:06					
PWS-ID:					660-03	347	Re	port Date:		July 1-	July 14, 2020				
Laboratory Name:					Advan	ced Environmental Laboratories, Inc.		Lea	ad or Copper:	Coppe	Copper				
Laboratory Contact:			:	Brand	on O'Hara		90t	th Percentile Valu	le:	0.139	0.1395				
L	Lab Phone Number:			Г.	(407)9	37-1594									
Γ			LOG	CATION		CLIENT SAMPLE		DATE SITE	COPPER (mg/l)	QUAL.	MDL (mg/L)	METHOD	ANALYSIS		
A	~	NANA	NO	TIER	ID	SITE	LAD SAMPLE ID		(DATE		

	NO	TIER	ID	SITE								
1			12	11522 CR 765 West	A2005314012	06/10/2020	0.0080	1	0.0027	SM 3113B	07/13/2020	E82535
2			5	11490 CR 678	A2005314005	06/17/2020	0.0091	- E	0.0027	SM 3113B	06/25/2020	E82535
3			2	11417 CR 675	A2005314002	06/12/2020	0.010	E.	0.0027	SM 3113B	06/25/2020	E82535
4			14	3280 CR 676	A2005314014	06/11/2020	0.011		0.0027	SM 3113B	07/13/2020	E82535
5			11	11601 CR 675	A2005314011	06/15/2020	0.012		0.0027	SM 3113B	07/13/2020	E82535
6			6	11552 CR 678	A2005314006	06/11/2020	0.014		0.0027	SM 3113B	06/25/2020	E82535
7			13	11432 CR 678	A2005314013	06/17/2020	0.015		0.0027	SM 3113B	07/13/2020	E82535
8			7	11559 CR 678	A2005314007	06/16/2020	0.018		0.0027	SM 3113B	06/25/2020	E82535
9			8	3209 CR 676	A2005314008	06/09/2020	0.020		0.0027	SM 3113B	06/25/2020	E82535
10			10	11427 CR 675	A2005314010	06/16/2020	0.020		0.0027	SM 3113B	06/25/2020	E82535
11			4	11489 CR 675	A2005314004	06/08/2020	0.023		0.0027	SM 3113B	06/25/2020	E82535
12			3	3257 CR 676	A2005314003	06/08/2020	0.025		0.0027	SM 3113B	06/25/2020	E82535
13			1	11542 US 301	A2005314001	06/17/2020	0.089	E	0.055	SM 3113B	06/25/2020	E82535
14			15	11497 CR 678	A2005314015	06/15/2020	0.19		0.027	SM 3113B	07/13/2020	E82535
15			9	3390 CR 677	A2005314009	06/15/2020	0.22		0.027	SM 3113B	06/25/2020	E82535

CERTIFICATION. The tap samples used for lead and copper analyses were submitted by the above PWS. Each sample container had one liter of solution (+/- 100mL). All samples were taken properly by the above system and analyzed in accordance with the requirements in Chapter 10D-41, F.A.C. The sampling dates were reported for each sample received. I hereby certify that all data submitted are correct.

SIGNATURE OF AUTHORIZED LABORATORY REPRESENTATIVE: NAME: Brandon O'Hara Brandon O'Hava

TITLE and DATE: Laboratory Manager

7/14/2020

Page 1 of 2

Lead and Copper Tap Sample Analysis And Result Ranking Report

Reporting Format 62-550.730(4)(a)

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System Name: The Woods Subdivision PWS-ID: 660-0347							Date	e Submitted to ort Date:	Lab:	06/18/ July 14			
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Lab	oratory C	ontact	÷	Brand	on O'Hara		90th	Percentile Va	lue:	0.0195	5		
Lab	Phone N	lumber	:	(407)9	937-1594								
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	2			14	3280 CR 676	A2005314014	06/11/2020	0.0015	U	0.0015	SM 3113B	06/29/2020	
	3			2	11417 CR 675	A2005314002	06/12/2020	0.0015	U	0.0015	SM 3113B	06/29/2020	Ī
	4			11	11601 CR 675	A2005314011	06/15/2020	0.0015	U	0.0015	SM 3113B	06/29/2020	
	5			10	11427 CR 675	A2005314010	06/16/2020	0.0015	U	0.0015	SM 3113B	06/29/2020	Ĩ
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SIGNATURE OF AUTHORIZED LABORATORY REPRESENTATIVE: Brandon O'Hava

NAME:

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Brandon O'Hara TITLE and DATE: Laboratory Manager

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7/14/2020

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Altamonte Springs: 528 S. Northlake Blvd., Ste. 1016 • Alt Gainesville: 4965 SW 41st Blvd. • Gainesville, FL 32608 • 35: Jacksonville: 6681 Southpoint Pkwy. • Jacksonville, FL 3221 Miramar: 10200 USA Today Way • Miramar, FL 33025 • 954.88 Tallahassee: 2639 North Monroe Street, Suite D • Tallahasse Tampa: 9610 Princess Palm Ave. • Tampa, FL 33619 • 813.630



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Miramar: 10200 USA Today Way • Miramar, FL 33025 • 954.889.2288 • Fax 954.889.2281

Tallahassee: 2639 North Monroe Street, Suite D • Tallahassee, FL 32303 • 850.219.6274 • Fax 850.219.6275

Tampa: 9610 Princess Palm Ave. • Tampa, FL 33619 • 813.630.9616 • Fax 813.630.4327

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13	11432 CR 678	G	06/17/20	1:05 PM	DW	1		X	X									13
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IMPORTANT INFORMATION ABOUT LEAD and COPPER IN YOUR DRINKING WATER

The Woods Utility found elevated levels of lead in drinking water in some home/buildings during the January – June 2020. Lead can cause serious health problems, especially for pregnant women and children 6 years and younger. Please read this information closely to see what you can do to reduce lead in your drinking water.

Health Effects of Lead

Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys, and can interfere with the production of red blood cells that carry oxygen to all parts of the body. The greatest risk of lead exposure is to infants, young children, and pregnant women. Scientists have linked the effects of lead on the brain with lowered IQ in children. Adults with kidney problems and a high blood pressure can be affected by low levels of lead more than healthy adults. Lead is stored in the bones and it can be released later in life. During pregnancy, the child receives lead from the mother's bones, which may affect brain development.

Sources of Lead

Lead is a common metal found in the environment. Drinking water is one possible source of lead exposure. The main sources of lead exposure are lead-based paint and lead-contaminated dust or soil, and some plumbing materials. In addition, lead can be found in certain types of pottery, pewter, brass fixtures, food, and cosmetics. Other sources include exposure in the work place from certain hobbies (lead can be carried on clothing or shoes).

New brass faucets, fittings, and valves, including those advertised as "lead-free", may contribute lead to drinking water. The law currently allows end-use brass fixtures, such as faucets, with up to 8 percent lead to be labeled "lead free". However, plumbing fixtures labeled National Sanitation Foundation (NSF) certified may only have up to 2 percent lead. Consumers should be aware of this when choosing fixtures and take appropriate precautions.

The Woods Utility has one source water well which pulls from the Floridian Aquifer. When water is in contact for several hours with pipes or plumbing that contains lead, the lead may enter the drinking water. Homes built before 1986 are more likely to have plumbing containing lead. New homes may also have lead; even "lead-free" plumbing may contain some lead.

EPA estimates that 10 to 20 percent of a person's potential exposure to lead may come from drinking water. Infants who consume mostly formula mixed with lead-containing water can receive 40 to 60 percent of their exposure to lead from drinking water.

Lead is not only found in drinking water; other sources of lead include paint, dust, and soil. Don't forget about other sources of lead such as lead paint, lead dust, and lead in soil. Wash your children's hands and toys often as they can come into contact with dirt and dust containing lead.

Steps You Can Take To Reduce Your Exposure To Lead In Your Water

- Run your water to flush out lead. If water hasn't been used in several hours, run water for 15-30 seconds or until it becomes cold or reaches a steady temperature before using it for drinking or cooking. This flushes lead-containing water from the pipes.
- Use cold water for cooking and preparing baby formula. Do not cook with or drink water from the hot water tap; lead dissolves more easily into hot water. Do not use water from the hot water tap to make baby formula.

- 3. Do not boil water to remove lead. Boiling water will not reduce lead.
- 4. Look for alternative sources or treatment of water. You may want to consider purchasing a water filter or bottled water. Read the package to be sure the filter is approved is approved to reduce lead or contact NSF International at 800-NSF-8010 or <u>www.nsf.org</u> for information on performance standards for water filters. Be sure to maintain and replace a filter devise in accordance with the manufacturer's instructions to protect water quality.
- 5. Test you water for lead. If you think you may have elevated lead levels in your home drinking water, have it tested. Call the Safe Drinking Water Hotline (800-426-4791) for more information, the Sumter County Environmental Health Department at 352-569-3131 Currently the Woods Utility System collected ten (10) samples from the approved Lead and Copper sampling plan on a semi-annual basis.
- 6. Get your child's blood tested. If you are concerned about exposure to lead, contact your local health department or health care provider to find out how you can get your child tested.
- 7. Identify and replace plumbing fixtures containing lead. Brass faucets, fittings, and valves, including those advertised as "lead-free", may contribute lead to drinking water. The law currently allows end-use brass fixtures, such as faucets, with up to 8% lead to be labeled as "lead free." Visit the National Sanitation Foundation Web site at <u>www.nsf.org</u> to learn more about lead-containing plumbing fixtures.

What happened? What is being done?

The Woods Utility detected elevated levels of lead in drinking water in some homes during the January – June 2020 monitoring period.

The Woods Utility System has recently installed a sequestrian agent (Aqua Gold) on August 16, 2019, and has installed auto flushers and an orthosphate system to the WTP (Water Treatment Plant). Orthophosphate is a food-grade additive that we add to our treatment plants to help reduce lead levels in water. When water with orthophosphate runs through the system, it creates a coating on the inside of lead service lines, creating a barrier between the lead pipes and the water. This is called "corrosion control". The Environmental Protection Agency (EPA) and the Florida Department of environmental Protection (FDEP) recognizes orthophosphate as an effective additive in water in reducing lead levels. It is also recognized as safe by the U.U. Food and Drug Administration.

For more information

Call us at 866-753-8292, or visit our website at <u>www.mywaterservice.com</u>. For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA's website at <u>www.epa.gov/lead</u>, or contact your health care provider.

The Woods Subdivision PWS# 660-0347

July 20, 2020: