

Antonia Hover

From: Betty Leland
Sent: Wednesday, October 14, 2020 10:39 AM
To: Commissioner Correspondence
Subject: Secondary Standard Workshop
Attachments: RE Secondary Standard Workshop; Secondary Standard Workshop

Good Morning:

Please place this email in Docket #20200000.

Thanks.

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

Antonia Hover

From: Troy Rendell <trendell@uswatercorp.net>
Sent: Tuesday, October 13, 2020 11:39 AM
To: Joe Kuhns; Marissa Ramos; Office of Commissioner Polmann; Office of Commissioner Graham
Cc: Gary.williams@frwa.net; mike@fus1llc.com; JR Kelly; chris.snow@uiwater.com; Patrick.Flynn@uiwater.com; Tom Ballinger; mfriedman@deanmead.com; Kathryn Cowdery
Subject: RE: Secondary Standard Workshop
Attachments: Testing for Secondary Water Standards in Water Distribution Systems.docx

Good morning,

I also appreciate the opportunity for us to participate in the workshop last week. I have attached a proposed draft rule for further discussions and/or workshop. The attached proposal would address distribution sampling plans being required to be submitted and approved by the Commission.

I look forward to further discussions on this topic.

Troy Rendell
Vice President - Investor Owned Utilities



4939 Cross Bayou Boulevard
New Port Richey, FL 34652
(Office) 727-848-8292 x245
(Mobile) 727-777-2508
(Fax) 727-848-7701
(E-Mail) trendell@uswatercorp.net

From: Joe Kuhns <jkuhns@plurisusa.com>
Sent: Tuesday, October 13, 2020 11:19 AM
To: mramos@psc.state.fl.us; Commissioner.Polmann@psc.state.fl.us; Commissioner.Graham@psc.state.fl.us
Cc: trendell@uswatercorp.net; Gary.williams@frwa.net; mike@fus1llc.com; kelly.jr@leg.state.fl.us; chris.snow@uiwater.com; Patrick.Flynn@uiwater.com
Subject: Secondary Standard Workshop

Dear Marissa,

Thank you for allowing Pluris Wedgfield to participate in the Secondary Standards workshop. I have attached a letter expressing our appreciation and our intentions on sampling for Secondary Standards going forward.

Joseph M. Kuhns
Regional Manager



Pluris Holdings LLC

O 863.940.9771 / **M** 813.526.0608

O 1102 S. Florida Ave., Lakeland, FL. 33803

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Testing for Secondary Water Standards in Water Distribution Systems

Each water utility should submit a distribution system testing plan for secondary water standards to the Commission for review and approval. The distribution system secondary water standards testing plan should be system specific and should take into consideration the following criteria:

- (a) Number of customer complaints received within the most recent twelve month period on secondary water standard complaints include discoloration of water (color), odor, and hardness (Total Dissolved Solids – TDS);
- (b) Location of customer complaints;
- (c) Source water constituents;
- (d) Length of distribution system;
- (e) Customer density
- (f) Customer seasonality
- (g) Previous secondary water standards test results;
- (h) Type of material of distribution system.

If customer complaints concerning secondary water standards is below five percent (5%) of the total number of water customers in the most recent twelve month period, the water utility shall follow the required testing schedule of the Department of Environmental Protection.

If customer complaints concerning secondary water standards is above five percent (5%) of the total number of water customers in the most recent twelve month period, the water utility shall follow its approved distribution system secondary water standards testing plan.

In no instance shall the water utility not follow the required schedule prescribed by the Department of Environmental Protection.

If the utility experiences clusters of secondary water complaints in a concentrated area or areas, the utility should perform further investigation of the area.

Secondary water standard results should be submitted to the Public Service Commission with the utility's summary of the test results. The summary should provide an explanation of the issue and the proposed resolution, as well as the potential cost of the proposed resolution.

Prior to filing for a rate increase pursuant to Sections 367.081, 367.0814, 367.0822; the water utility shall perform secondary water standards testing no less than twelve months prior to the request.

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Sent: Tuesday, October 13, 2020 11:19 AM
To: Marissa Ramos; Office of Commissioner Polmann; Office of Commissioner Graham
Cc: trendell@uswatercorp.net; Gary.williams@frwa.net; mike@fus1llc.com; JR Kelly; chris.snow@uiwater.com; Patrick.Flynn@uiwater.com
Subject: Secondary Standard Workshop
Attachments: Pluris Wedgefield_Secondary Standards Workshop_Letter.pdf

Dear Marissa,

Thank you for allowing Pluris Wedgefield to participate in the Secondary Standards workshop. I have attached a letter expressing our appreciation and our intentions on sampling for Secondary Standards going forward.

Joseph M. Kuhns
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October 13, 2020

via email only: mramos@psc.state.fl.us

Ms. Marissa Ramos
Division of Engineering
Florida Public Service Commission

Re: Staff Workshop on Testing for Secondary Water Quality Standards in Water Distribution System

Dear Ms. Ramos,

I am writing to you to thank you for the opportunity Pluris Wedgefield, Inc., had in participating with other utilities in the Florida Public Utilities Commission's ("Commission") Workshop. While the Florida Department of Environmental Protection ("FDEP") requirements provide for testing of secondary water quality standards every three years at a point prior to entering the distribution system, Pluris Wedgefield, Inc. recognizes that this may not be indicative of the water quality experienced by everyone of the utility's customer. Thus, Pluris would support annual testing for secondary water quality standards at point(s) within the distribution system as determined by the utility operator or in concurrence with the FDEP, to be most indicative of system-wide water quality.

Pluris believes this information will not only be valuable information to the utility in providing its customers with continued good quality water, but will provide the Commission in rate cases with subjective data with which to evaluate customer's subjective comments on water quality. Although such testing is not yet required, Pluris intends to conduct such testing in its distribution system this year and will present the results in its upcoming rate case.

Although expensive, the cost of annual secondary water quality sampling is a reasonable operating and maintenance expense and should be recovered in the revenue requirement as other O&M expenses. We look forward to working with the Staff is moving towards more specific guidelines addressing this issue.

Again, thank you for allowing utilities to participate in the workshop and best regards,



Joseph Kuhns
Pluris Florida Manager