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REBUTTAL TESTIMONY OF RAFAEL A. TERRERO  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
ON BEHALF OF  
FLORIDA WATER SERVICES CORPORATION  
DOCKET NO. 971638-SU

1 Q. PLEASE STATE YOUR NAME AND ADDRESS.

2 A. My name is Rafael A. Terrero. My business address  
3 is P.O. Box 609520, Orlando, Florida 32860-9520.

4 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

5 A. I am employed by Florida Water Services  
6 Corporation. (Florida Water) as Vice President -  
7 Environmental Compliance. Prior to holding this  
8 position, I served as Manager of Environmental  
9 Services and then as Chief Engineer in charge of  
10 Engineering and Planning.

11 Q. COULD YOU BRIEFLY DESCRIBE YOUR DUTIES AS VICE  
12 PRESIDENT OF ENVIRONMENTAL COMPLIANCE?

13 A. As Vice President of Environmental Compliance, I  
14 am responsible for all activities of the  
15 Environmental Compliance and Permitting Department  
16 including coordination of all Company efforts with  
17 environmental regulators, preparation, filing and  
18 processing of permits for all facilities  
19 statewide, and statewide monitoring, training and  
20 auditing of compliance with applicable laws, rules  
21 and standards. My department must maintain  
22 familiarity with all environmental issues  
23 affecting Florida Water's facilities statewide. I

1           also work with Florida Water's other departments  
2           in the budget evaluation process so Florida  
3           Water's investments each year are directed to  
4           projects based on an established priority basis.

5       **Q.   PLEASE SUMMARIZE YOUR EDUCATION.**

6       A.   I received a Bachelor of Science degree with a  
7           major in Environmental and Urban Systems from the  
8           School of Technology, Florida International  
9           University in December 1974.

10                I have completed courses in utility  
11                regulation sponsored by the National Association  
12                of Regulatory Utility Commissioners (NARUC) in  
13                conjunction with the University of South Florida.  
14                I have also participated in seminars sponsored by  
15                the Training Research and Education for  
16                Environmental Occupation (TREEO) center in  
17                conjunction with the University of Florida in  
18                reference to water and wastewater treatment  
19                facilities.

20       **Q.   WHAT ARE YOUR PROFESSIONAL AFFILIATIONS?**

21       A.   I am a Professional Engineer and have been  
22           registered to practice in the State of Florida  
23           since 1977.  I am a member of the American Society

1 of Civil Engineers, Florida Engineering Society,  
2 the American Water Works Association and the Water  
3 Environment Association. I also am a member of  
4 the AWWA Water Supply Committee, AWWA Reuse  
5 Committee, FEA Reuse Committee and am a former  
6 member of the Lee County Water Supply Authority.

7 **Q. HAVE YOU PREPARED A RESUME WHICH REFLECTS YOUR**  
8 **QUALIFICATIONS AND PRIOR WORK EXPERIENCE?**

9 A. Yes. Exhibit \_\_\_\_\_ (RAT-1) contains a copy of my  
10 current resume which identifies my qualifications  
11 and prior work experience.

12 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE A REGULATORY**  
13 **AGENCY?**

14 A. Yes. I have testified before the Florida Public  
15 Service Commission and before hearing officers in  
16 Hillsborough County on behalf of Florida Water in  
17 multiple dockets. I have also testified as an  
18 expert witness before the Division of  
19 Administrative Hearings on matters of  
20 environmental regulations and compliance.

21 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

22 A. To rebut certain assertions made by the City of

1 Longwood's witnesses in this matter.

2 **Q. WHAT SPECIFIC STATEMENTS DO YOU WISH TO REBUT?**

3 A. Mr. Kornbluh and Mr. Brock both indicate in their  
4 prefiled testimony that, subject to the  
5 Commission's denying Florida Water's amendment  
6 application, the City could have sewer service  
7 available to the disputed territory in 1999. Mr.  
8 Kornbluh also indicates that the costs for Florida  
9 Water and the City to provide service are similar.  
10 For the record, Florida Water wishes to make it  
11 clear that it could have service available to the  
12 disputed territory in six to nine months from the  
13 date of the Commission's granting Florida Water's  
14 application. Florida Water would provide service  
15 just as quickly, if not more quickly, than the  
16 City. Further, as has already been stated in the  
17 discovery answers and testimony provided in this  
18 case, (1) Florida Water's estimated construction  
19 cost for providing service is lower than the  
20 City's, \$130,000 for Florida Water versus  
21 approximately \$220,000 plus \$20,000 in outside  
22 engineering costs for the City; (2) Florida Water  
23 has a collection line less than 300 feet from the

1 connection point of Bennett Commerce Park while  
2 the City's nearest collection line is over 1000  
3 feet away (per the City's answer to staff  
4 interrogatory no. 5); and (3) Florida Water's  
5 existing treatment plant has available unused  
6 capacity. (A conceptual design drawing for the  
7 collection facilities needed for Florida Water to  
8 provide wastewater service to the disputed  
9 territory is attached hereto as Exhibit \_\_\_\_ (RAT-  
10 2)). Florida Water maintains that it is  
11 economically efficient for Florida Water to serve  
12 the disputed territory.

13 **Q. DO YOU HAVE ANY OTHER REBUTTAL COMMENTS?**

14 A. Yes. The City's witnesses state that it is not in  
15 the public interest for Florida Water to serve the  
16 disputed territory. Needless to say, Florida  
17 Water disagrees for the reasons it has already  
18 presented. It also warrants emphasizing that  
19 Florida Water has reuse available to the disputed  
20 territory, but the City does not. It is debatable  
21 whether Florida Water could provide reuse to the  
22 disputed area if the Commission were to deny  
23 Florida Water's application. Aside from any legal

1            questions involved, as a practical matter, Florida  
2            Water might not have sufficient wastewater flows  
3            from its existing customer base to provide reuse-  
4            only service to the disputed territory. In other  
5            words, to provide reuse to the disputed area,  
6            Florida Water will need the wastewater flows from  
7            the disputed area. Therefore, in order to  
8            maximize reuse utilization, it would be in the  
9            public interest to include the disputed territory  
10           in Florida Water's service area.

11        **Q. DO YOU HAVE ANY FURTHER COMMENTS AT THIS TIME?**

12        **A. No.**

**RAFAEL A. TERRERO, P.E., DEE**  
Vice President, Environmental Compliance

Mr. Terrero has 33 years of experience in the water and wastewater business. He is the Vice President of Environmental Compliance at Florida Water Services Corporation. In this role, he is responsible for the overall management of the Company's sophisticated water and wastewater permitting and compliance issues.

Permitting and Compliance of Reuse Systems:

Mr. Terrero also served as Chief Engineer, Planning and Engineering

**EDUCATION**

B.S. Environmental and Urban Systems

**PROFESSIONAL REGISTRATION**

Civil Engineer, State of Florida No. 21076, (January 1977)

**PUBLICATIONS**

Co-Author of The Planning and Design of a Reverse Osmosis Plant Using a Deteriorating Water Supply presented at the AWWA Membrane Technology Conference (March 1991). Co-Author of Marco Island RO Plant, Overcoming Regulatory and Construction Obstacles, A Case Study presented at the AWWA 1992 Conference, Vancouver B.C. (June 1992).

**EXPERIENCE**

(May 1992 to Present)

Performs water and wastewater monitoring for operational compliance with environmental regulatory requirements; such monitoring may include safety considerations, testing and permitting. Performs administrative work relating to assignments including appropriate reports (Capacity Analysis Reports, Operation and Maintenance Performance Reports and Reuse Feasibility Studies), action plans and recommendations. Effective performance achieved through application of internal and professional practices and cost considerations to assure compliance with all rules, regulations and permits while maintaining reliable, cost-effective service.

(August 1989 to May 1992)

Chief Engineer, Planning and Engineering. (Solely in charge of Engineering and Planning Department and staff of 14. Provided in house Engineering services and supervision of outside Consultants for all of the company's 144 water, wastewater and gas systems. Responsibilities included management and coordination of all activities of engineering staff, establishment of basic design approach.) In charge of planning, including feasibility studies and budgeting. Preparation of used and useful analysis, testifying on prudence of investment, etc., before the Public Service Commission and other regulatory agencies.

Robayna and Associates, 15900 N.W. 57th Ave., Miami Lakes, Florida 33014  
(March 1989 to August 1989)

Vice President/Chief Operating Officer, Dade County Office. Directed operations for Dade County's office consisting of 26 professional and technical personnel. In charge of complete office operation client contact, providing engineering support to Engineering and Surveying Departments. Supervision and coordination of office and field personnel.



**Rafael A. Terrero, P.E., DEE**

Manager, Environmental Services

Deltona Utilities Consultants, Inc., 3250 S.W. Third, Miami, Florida 33129  
(October 1966 to March 1989)

Vice President and Chief Utilities Engineer, Engineering Department. Responsibilities included management and coordination of all activities of engineering staff, establishment of basic design approach to be used for all network systems and treatment facilities. Coordination and programming of facility design consistent with community growth. Master planned all of the Deltona Utilities System's water and wastewater systems. Responsible for water and wastewater systems operations.

Consultant to Utilities Field personnel in all phases of facility construction and operation. Coordination with clients to provide consulting services. Professional engineering and administrative work directing and coordinating water and wastewater facility agreements between the utilities and private property developers and owners. Responsibilities included directing the activities and coordinating the functions of water and wastewater developer inspections, developer agreements preparation, new business activities and develop plan review.

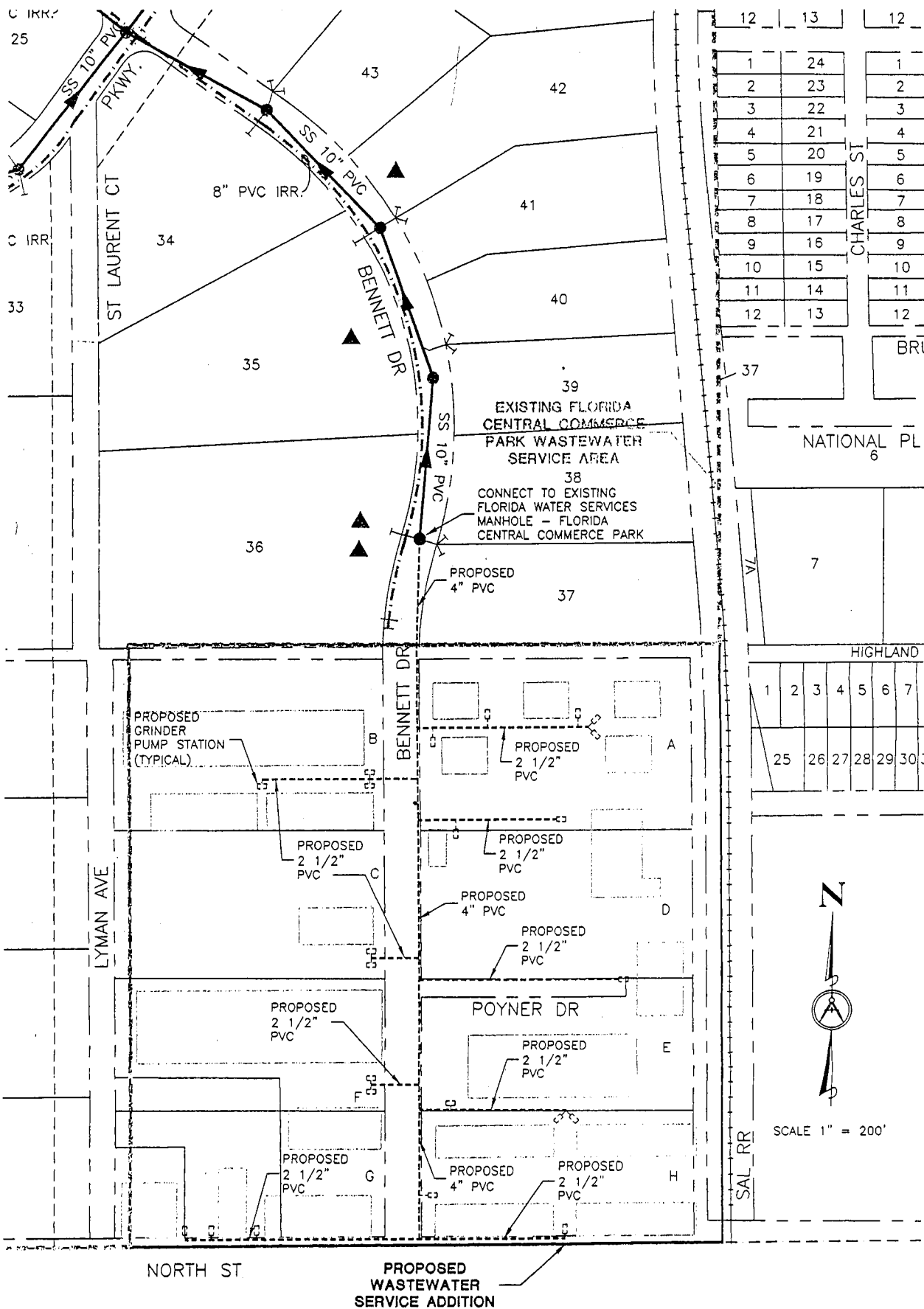
Anthony J. Malley, Consulting Engineer, 1111 Boxwood Lane, Syracuse, New York  
(October 1963 to September 1966)

Designer. Design and inspection of water distribution and wastewater collection systems. Design and inspection of stormwater systems.

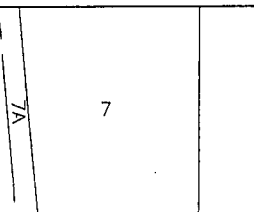
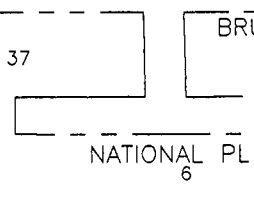
**ORGANIZATIONS**

American Society of Civil Engineers  
Florida Engineering Society  
American Water Works Association (AWWA)  
AWWA Water Supply Committee  
Water Environment Association  
Lee County Water Supply Authority (former member)  
St. Johns River Water Management District Water  
Utility Advisory Board Subcommittee

FEA Reuse Committee  
Water Environment Federation Reuse Committee  
AWWA Reuse Committee  
Florida Operators Reuse Committee  
South Florida Water Management District Water  
Utility Advisory Board, Reuse Subcommittee



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HIGHLAND						
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SCALE 1" = 200'



PRELIMINARY DESIGN PLAN FOR FLORIDA CENTRAL COMMERCE PARK  
PROPOSED EXPANSION - BENNETT COMMERCE PARK  
GRINDER PUMP SYSTEM