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OFFICE OF THE PUBLIC COUNSEL

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July 31, 2000

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

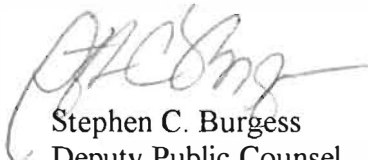
RE: Docket No. 991643-SU

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Prefiled Testimony of Ted L. Bidy, P.E./P.L.S. for filing in the above-referenced docket.

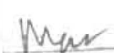
Also Enclosed is a 3.5 inch diskette containing the Prefiled Testimony of Ted L. Bidy, P.E./P.L.S. in WordPerfect for Windows 6.1 format. Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,


Stephen C. Burgess
Deputy Public Counsel

SCB/dsb
Enclosures

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**PREFILED TESTIMONY
OF
TED L. BIDDY, P.E. / P.L.S.**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ON BEHALF OF THE

CITIZENS OF THE STATE OF FLORIDA

DOCKET NO. 991643-SU

July 31, 2000

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July 31, 2000

1 **Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

2 A. My name is Ted L. Bidy. My business address is 2308 Clara Kee Boulevard,
3 Tallahassee, Florida 32303.

4 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

5 A. I am currently self-employed as a professional engineer and land surveyor.

6 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND AND WORK
7 EXPERIENCE?**

8 A. I graduated from the Georgia Institute of Technology with a B.S. degree in Civil
9 Engineering in 1963. I am a registered professional engineer and land surveyor
10 in Florida, Georgia, Mississippi and several other states. I was the vice-
11 president of Baskerville-Donovan, Inc. (BDI) and the regional manager of their
12 Tallahassee Office from April 1991 until February 1998. I left the employment
13 of BDI on September 30, 1998. Before joining BDI in 1991, I had operated my
14 own civil engineering firm for 21 years. My areas of expertise include civil
15 engineering, structural engineering, sanitary engineering, soils and foundation
16 engineering and precise surveying. During my career, I have designed and
17 supervised the master planning, design and construction of thousands of
18 residential, commercial and industrial properties. My work has included: water
19 and wastewater facility design; roadway design; parking lot design; stormwater
20 facilities design; structural design; land surveys; and environmental permitting.

1 I have served as the principal and chief designer for numerous utility projects.
2 Among my major water and wastewater facilities designs have been a 2,000 acre
3 development in Lake County, FL; a 1,200 acre development in Ocean Springs,
4 MS; a 4-mile water distribution system for Talquin Electric Cooperative, Inc.
5 and a 320-lot subdivision in Leon County, FL.

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

7 A. I am a member of the Florida Engineering Society, National Society of
8 Professional Engineers, Florida Institute of Consulting Engineers, American
9 Consulting Engineers Council, American College of Forensic Examiners and the
10 Florida Society of Professional Land Surveyors.

11 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE A STATE OR
12 FEDERAL COURT AS AN ENGINEERING EXPERT WITNESS?**

13 A. Yes, I have had numerous court appearances as an expert witness for cases
14 involving roadways, utilities, drainage, stormwater, water and wastewater
15 facilities designs.

16 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE FLORIDA
17 PUBLIC SERVICE COMMISSION (PSC OR COMMISSION) FOR USED
18 AND USEFUL ANALYSIS AND OTHER ENGINEERING ISSUES?**

19 A. Yes, I have testified before the PSC for Docket Nos. 940109-WU, 950495-WS,
20 950387-SU, 951056-WS, 950387-SU, 960329-WS and 971065-SU on various

1 engineering issues and used and useful analyses.

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

3 A. The purpose of my testimony is to provide engineering testimony on the used
4 and useful calculation issues for this rate case.

5 **Q. DURING YOUR REVIEW OF THIS CASE WHAT DOCUMENTS DID
6 YOU REVIEW AND WHAT INVESTIGATIONS DID YOU MAKE?**

7 A. I studied all the MFR filings and exhibits as filed by the Utility, all PSC Staff
8 and Utility correspondence, all discovery furnished by Aloha to the PSC Staff. I
9 also attended the depositions of Aloha's engineer and accountant, Messrs. David
10 Porter and Robert Nixon. I also made an onsite inspection of the construction
11 work in progress at Aloha's Seven Springs Wastewater Treatment Plant
12 (WWTP) and conducted a field inspection of all the service area. I further
13 interviewed Florida Department of Environmental Protection (FDEP) permitting
14 and enforcement staff regarding Aloha's WWTP and read all FDEP files
15 concerning Aloha since 1996. I also obtained copies of pertinent parts of
16 FDEP's file.

17 **Q. DO YOU AGREE WITH THE 100% USED AND USEFUL ANALYSIS
18 PROPOSED BY THE ALOHA UTILITIES, INC. (UTILITY OR ALOHA)
19 FOR THE SEVEN SPRINGS WASTEWATER COLLECTION SYSTEM?
20 IF NOT, PLEASE EXPLAIN WHY YOU DO NOT AGREE AND WHAT**

1 **IS THE APPROPRIATE METHODOLOGY FOR CALCULATING THE**
2 **USED AND USEFUL PERCENTAGE?**

3 A. No, I do not agree that the collection system is 100% used and useful. Aloha
4 asserts that all the wastewater collection systems are fully contributed in
5 Schedule F-7. However, according to the Schedule A's, Aloha has constructed
6 many force mains and pumping stations which were not contributed by the
7 developers. Moreover, during the projected test year ending 9/30/01, Aloha
8 proposes to construct a major pumping station and force mains and
9 improvements to the gravity collection system at a cost of \$1,657,815, none of
10 which is shown as contributed by developers. Therefore, a used and useful
11 adjustment to the rate base is necessary. Because there is no detail system
12 information available the appropriate methodology should be the comparison of
13 connected lots and total potentially available lots. For my determination, the
14 most recent aerial photos and the Pasco County Tax Assessor's online database
15 were used to identify the build out percentages in each section of Aloha's service
16 area.

17 **Q. WHAT IS THE APPROPRIATE USED AND USEFUL PERCENTAGE**
18 **FOR THE WASTEWATER COLLECTIONS SYSTEM?**

19 A. By my methodology, I have computed a used and useful percentage for the
20 collection system of 78.7%. See my attached Exhibit TLB-1 for the detailed

1 calculations.

2 **Q. DO YOU AGREE WITH THE UTILITY'S WITNESS MR. PORTER**
3 **THAT ALOHA SHOULD EXPECT 350,000 TO 1,400,000 GPD**
4 **INFILTRATION TO ITS COLLECTION SYSTEM?**

5 A. No. It is correct that there are many guidelines suggesting different allowances
6 of infiltration amounts for wastewater collection systems. However, many of
7 those numbers are intended for older types of sewer systems, such as clay pipes
8 with non-compression type joints. I believe a stringent standard should be used
9 for this system because it has mostly PVC gravity sewers, which are not prone to
10 infiltration, because the joints are sealed with rubber gaskets or synthetic
11 material. If the PSC were to allow 1,400,000 GPD flow for normal infiltration
12 as requested by Aloha in MFR Schedule F-6 page 2 of 3, then 87.5% of the 1.6
13 MGD plant capacity will be wasted because it would be treating groundwater in
14 addition to the domestic wastewater. Even a flow of 350,000 GPD will equate to
15 21.8% of the 1.6 MGD plant capacity. From today's engineering and economic
16 standpoint, the infiltration allowance range of 350,000 to 1,400,000 GPD flow is
17 definitely unacceptable for the general ratepayers. It is certainly not economical
18 or cost effective to devote so much plant capacity to treat groundwater instead of
19 domestic wastewater. The familiar FDEP rule of 200 GPD per inch of pipe
20 diameter per mile of sewer line should be used as the limit for any I/I. By this

1 rule and for Aloha's 35 miles of average 8 inch diameter sewers, the I/I
2 allowance would be 56,000 GPD.

3 **Q. DO YOU BELIEVE THERE IS EXCESS INFILTRATION IN THE**
4 **WASTEWATER COLLECTION SYSTEM AND HOW MUCH**
5 **ADJUSTMENT SHOULD BE MADE TO THE TREATED PLANT**
6 **FLOW?**

7 A. Yes, I believe this system does have inflow and infiltration (I/I) problems and
8 the amount is excessive because this issue was specifically identified in the DEP
9 consent final judgment (Case No. 93-4356). In that Judgment, the Utility is
10 entitled to a half-gallon credit for each gallon of flow to the plant that is
11 eliminated as a result of the I/I program. Currently the Utility has identified that
12 a flow reduction of 140,000 GPD can be achieved when just a portion of the
13 collection system is repaired. At this point, however, the I/I reduction program
14 has not been completed. Rather, the program is still in the process of seeking to
15 identify other areas of the collection system that might reduce I/I if repaired.
16 This amount of I/I reduction will be higher when the I/I reduction program has
17 studied the entire collection system. Since the entire projected cost of the I/I
18 reduction program has been included in the filing, the entire reduction effect also
19 should be recognized.

20 There is evidence in the March 1, 2000 Capacity Analysis Report, Update

1 Number 2, prepared by Mr. David Porter for Aloha Utilities, Inc., that indicates
2 excess inflow/infiltration in the collection system. For the flow projection, a
3 flow reduction close to 210,000 GPD was made to the 1998 plant flow because
4 abnormally high groundwater level/surface flooding occurred in that year. Since
5 Aloha's Engineer, at his deposition of 7/24/00, could not confirm what
6 percentage of the system has been investigated, I have used the assumption that
7 the total infiltration reduction can achieve 280,000 GPD after the I/I study is
8 complete. We know that only a small portion of the collection system has been
9 examined with a finding of 140,000 GPD of I/I which can be eliminated, and
10 therefore it is not unreasonable to assume that at least another 140,000 GPD of
11 I/I will be found and eliminated from the remainder of the collection system.
12 Therefore, the plant flows I used for the used and useful calculations have been
13 adjusted downward for the removal of 280,000 GPD excess I/I. If the study
14 update information becomes available after my filing, I will revise my I/I
15 adjustment accordingly.

16 **Q. SHOULD THE OPERATING EXPENSES BE ADJUSTED FOR THE**
17 **EXCESS INFLOW AND INFILTRATION?**

18 A. Yes, consistent with the reasoning explained above, I believe the power and
19 chemical expenses should be adjusted for 23.37% (i.e. 280,000 GPD/1.198
20 MGD). This number may increase, if more I/I study reports become available

1 after my original pre-filed testimony. I also believe that the maintenance of new
2 equipment which is shown as 5% of the value of new equipment is overstated
3 because the equipment manufacturer and general contractor must guarantee and
4 repair any defects during the first year of service. The new equipment will be
5 operational about October 1, 2000 and therefore the equipment guarantee will
6 last almost exactly the full projected test year. Because Aloha has not adjusted
7 for this factor, this overstated estimate should be removed.

8 **Q. WHAT IS THE APPROPRIATE USED AND USEFUL PERCENTAGE**
9 **FOR THE WASTEWATER TREATMENT PLANT?**

10 A. See my attached Exhibit TLB-2 for methodology and Exhibit TLB-3 for details.
11 The percentage adjustment of 72.97% for the year 2006 which gives a full 5
12 years margin reserve should be applied to the Rate Base for the plant capacity
13 increase to 1.6 MGD. I have recently received the design calculations for the
14 plant which was a part of the FDEP permit application. These design
15 calculations indicate that portions of the current upgrade to the plant were
16 designed for the ultimate capacity of 2.4 MGD. These components were the
17 equalization tank and the new headworks. Moreover, two of the existing
18 components consisting of the reuse chlorine contact chamber and the seven-cell
19 filter are also shown in the design calculations to be sized for the ultimate flow
20 of 2.4 MGD. For these four components, a more accurate used and useful

1 percentage would be 1,167,574 GPD/2,400,000 GPD or 48.65%. If we can
2 verify that these ultimate capacity components were actually installed and if the
3 accountant can isolate the costs of these components, then a further used and
4 useful adjustment should be made to these components. I will file a revised
5 Exhibit TLB-3 once this information can be verified.

6 **Q. DO YOU BELIEVE A USED AND USEFUL ADJUSTMENT SHOULD BE**
7 **MADE TO THE REUSE FACILITIES?**

8 A. Though the reuse facilities are required to comply with the FDEP requirement, I
9 believe that equity and fairness would dictate that existing customers should
10 only pay for their own share but should not pay for the future customers.
11 Therefore, the used and useful adjustments should be applied to all the reuse
12 facilities and reuse force mains. When there is no detail design information
13 available, the treatment plant used and useful percentage (72.97%) should be
14 applied to the reuse facilities, pumping station and force mains. If more detail
15 information became available after my pre-filed testimony, I intend to update the
16 used and useful percentages before the public hearing. Based on my field
17 investigation and verbal information provided by Mr. Porter, I believe the reuse
18 system can have a 2.5 MGD capacity without additional upgrade. The 2.5 MGD
19 should provide enough capacity to serve additional demand for the next 20
20 years. This capacity is based on the reported 24, 18 and 12 inch force mains

1 with two 1,750 GPM pumps and one 1750 GPM spare pump at the reuse
2 pumping station. If this design information is confirmed, the used and useful
3 percentage with a 5 year margin reserve would be substantially lower than the
4 72.97% adjustment discussed above.

5 **Q. WHAT IS THE EFFECT OF SECTION 367.0817, FLORIDA STATUTES,**
6 **ON THE PERMISSIBILITY OF MAKING USED AND USEFUL**
7 **ADJUSTMENTS ON REUSE FACILITIES?**

8 **A.** I am aware that Section 367.0817 addresses this issue. That provision was only
9 recently passed, and to my knowledge, it has not been interpreted by a Florida
10 court. Since I am not a lawyer, I do not feel qualified to render a legal opinion
11 as to how that statutory provision would be applied in this particular situation. It
12 is inconceivable to me, however, that the Florida legislature could have intended
13 that today's customers should be saddled with the capital carrying costs for
14 facilities that will not be needed until the year 2021.

15 **Q. WHAT ARE THE EXHIBITS TLB-4A, TLB-4B AND TLB-4C WHICH**
16 **YOU HAVE ATTACHED TO YOUR TESTIMONY AND WHY DID YOU**
17 **PREPARE THESE EXHIBITS?**

18 **A.** Exhibits TLB-4A, B & C are summaries of the Utility's Schedules A-4(A), A-
19 4(B), and A-4(C) which they filed. I prepared my exhibits as summaries of
20 starting, ending and 13 month average balances of wastewater plant in service

1 for the three years ending 9/30/01; 9/30/00 and 9/30/99 using the identical
2 amounts shown on the Aloha Schedules. The reason that I prepared these
3 schedules was for ease in reading the schedules and to add a remarks column in
4 which I have computed and shown the amount of increase in each plant category
5 item for each of the three years. I have also added totals for the proposed plant
6 additions for each year. Please refer to the Exhibits and note that one can now
7 easily see that Aloha stated that it had added total plant in the amount of
8 \$2,316,543 in the historical test year ended 9/30/99; \$5,602,489 during the
9 intermediate year ending 9/30/00 and proposes \$1,657,815 in plant additions
10 during the projected test year ending 9/30/01. The grand total of plant additions
11 shown for the three years would therefore be the amount of \$9,576,847.

12 **Q. DURING YOUR INVESTIGATION, HAVE YOU BEEN ABLE TO**
13 **VERIFY THAT ALOHA HAS ADDED, IS ADDING AND PROPOSES TO**
14 **ADD TO THEIR TOTAL PLANT THE AMOUNTS WHICH YOU**
15 **COMPUTED ON YOUR EXHIBITS TLB-4(A), TLB-4(B) AND TLB-4(C)?**
16 **IF NOT, WHAT IS YOUR ADVICE IN THIS MATTER?**

17 A. No, I have not been able to confirm that as of the preparing of this testimony. I
18 would advise that we continue on with discovery and investigations in this
19 matter after the filing of the direct testimony and present revised testimony at the
20 hearing of this matter.

1 **Q. HOW MUCH OF THE \$9,576,847 ADDITION TO WASTEWATER**
2 **PLANT IN SERVICE AS PROPOSED BY ALOHA HAVE YOU BEEN**
3 **ABLE TO VERIFY DURING YOUR INVESTIGATION?**

4 A. I have been able to verify a total of approximately \$4,000,000 which is the total
5 of four construction contracts let on/about October 1, 1999 for upgrades at the
6 treatment plant which are nearing completion. I also have been told verbally by
7 Aloha's engineer, David Porter, that a part of the total consists of the new reuse
8 force mains which were constructed during the historical test year and a part will
9 consist of a new major pumping station and force main presently under design
10 and to be constructed during the projected test year. I also understand from Mr.
11 Porter that approximately \$571,000 of engineering fees to several engineering
12 firms is probably included in the total. I propose to continue my investigation
13 after this testimony is filed to try to verify the \$9,576,847 total. I would request
14 the opportunity to file revisions to this testimony, should it be necessary and
15 relevant.

16 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

17 A. Yes.

EXHIBIT LIST

EXHIBIT TLB-1	WASTEWATER COLLECTION SYSTEM ANALYSIS
EXHIBIT TLB-2	USED AND USEFUL METHODOLOGY
EXHIBIT TLB-3	USED AND USEFUL% SUMMARY
EXHIBIT TLB-4A, B & C	PLANT IN SERVICE SUMMARY

OPC WASTEWATER COLLECTION SYSTEM ANALYSIS

EXHIBIT TLB-1

Page 1 of 1

ANALYSIS OF USED & USEFULNESS OF ALOHA'S SEVEN SPRINGS WASTEWATER COLLECTION SYSTEM AS RELATED TO FORCE MAINS AND ONLINE PUMPING STATIONS

SECTION	TOWNSHIP	RANGE	TOTAL POTENTIAL CONNECTIONS	EXISTING CONNECTIONS
13	26S	16E	1479	1358
14	26S	16E	1399	1386
15	26S	16E	369	314
21	26S	16E	181	177
22	26S	16E	2078	2045
23	26S	16E	680	61
26	26S	16E	855	342
27	26S	16E	1122	548
28	26S	16E	184	153
34	26S	16E	801	675
35	26S	16E	988	477
36	26S	16E	895	329
31	26S	17E	1260	191
30	26S	17E	703	388
29	26S	17E	182	42
TOTALS			13176	8486

ERC REGRESSION EQUATION: $Y = 348.6X + 6985.7$

YEAR 2000: $Y = 348.6(7) + 6985.7 = 9426$

YEAR 2001: $Y = 348.6(8) + 6985.7 = 9774$

YEAR 2006: $Y = 348.6(13) + 6985.7 = 11,517$ (To give 5 year margin reserve)

$$\frac{\text{CONNECTIONS IN 2000}}{\text{ERCs IN 2000}} = \frac{\text{CONNECTIONS IN 2006}}{\text{ERCs In 2006}}$$

$$8486/9426 = X/11,517$$

$$\text{CONNECTIONS IN 2006} = 10,368$$

$$2006 \text{ USED \& USEFUL} = \frac{\text{LOTS CONNECTED IN 2006}}{\text{TOTAL LOTS}} = \frac{10,368}{13,176} = 78.7 \%$$

EXHIBIT TLB-2

USED AND USEFUL METHODOLOGY

I. WASTEWATER TREATMENT PLANT

Used & Useful % = **Annual ADF of Projected Year/Total Plant Capacity**

Annual ADF of Projected Year = (1999 AADF-Excess I/I) x $\frac{\text{Projected Year ERCs}}{1999 \text{ ERCs}}$

Note: AADF wastewater flow was adjusted for excess inflow/infiltration.

II. EFFLUENT DISPOSAL AND REUSE FACILITY

Used & Useful % = **Annual ADF of Projected Year/Total Plant Capacity**

Annual ADF of Projected Year = (1999 AADF-Excess I/I) x $\frac{\text{Projected Year ERCs}}{1999 \text{ ERCs}}$

Note: Since no effluent reuse data was yet available, the treatment plant used and useful percentage was applied for the effluent reuse facilities.

OPC USED AND USEFUL CALCULATIONS

Line **Wastewater Treatment Plant**
No. **Schedule F-6 (S)**

Docket No. 991643-SU

Company: Aloha Utilities, Inc. (Aloha)

Schedule Year Ended: **Sept. 30**

Historic [x]; Projected [x]

Seven Springs WWTP	Seven Springs WWTP	Seven Springs WWTP	Seven Springs WWTP
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	1999	2001	2002.5	2006
1 PERMITTED PLANT CAPACITY, ANNUAL ADF (GPD)	1,200,000	1,600,000	1,600,000	1,600,000
2 EFFLUENT DISPOSAL CAPACITY, ANNUAL ADF (GPD)	1,200,000	1,600,000	1,600,000	1,600,000
3 ANNUAL AVG. DAILY FLOW (GPD)¹	1,197,959	990,789	1,043,870	1,167,574
4 Without Excess Inflow/Infiltration (GPD)	917,959	990,789	1,043,870	1,167,574
5 EXCESS INFLOW/INFILTRATION (GPD)²	280,000	0	0	0
6				
7 TREATMENT PLANT AND EFFLUENT DISPOSAL³:				
8 Treatment Plant:				
9 OPC Calculated Used & Useful (%)	76.50%	61.92%	65.24%	72.97%
10 Aloha Requested U & U (%)	100.00%	100.00%	100.00%	100.00%
11				
12 Land & Land Rights:				
13 Total Acreage (ac)	5	5	5	5
14 Future Use Acreage (ac)	0	0	0	0
15 OPC Calculated Used & Useful (%)	100.00%	100.00%	100.00%	100.00%
16 Aloha Requested U & U (%)	100.00%	100.00%	100.00%	100.00%
17				
18 Effluent Disposal/Reuse Facilities:				
19 OPC Calculated Used & Useful (%)	76.50%	61.92%	65.24%	72.97%
20 Aloha Requested U & U (%)	100.00%	100.00%	100.00%	100.00%
21				
22				
23				
24				
25				
26				
27				
28 Notes:				
29 1. Per MFR Sch. F-2 and Projected from Sch. F-10. Assume two times of 140,000 gpd.				
30 2. Adopted from MFR Sch. F-6 plus 100% since only a small part of the system has been examined. If final I/I report reveals a different amount, then updated information will be provided.				
31 3. Use the same capacity as the plant, though the actual capacity is still under FDEP's evaluation.				
32				
33				
34				
35				
36				
37				

SUMMARY OF STARTING, ENDING AND 13 MONTH AVERAGE BALANCE OF WASTEWATER PLANT IN SERVICE

SUMMARY OF SCHEDULE A-4(A)				Exhibit TLB-4A		
				ENDING 9/30/01		
	09/30/2000	09/30/2001	13 Mo. Avg.	Non-Used & Useful %	Non-Used & Useful Amount	COMMENTS
Franchises	\$3,095	\$3,095	\$3,095			
COLLECTION PLANT						
Land & Land Rights	208,414	208,414	208,414			
Structures & Improvements	216,914	216,914	216,914			
Collection Sewers-Force Mains	1,534,349	2,763,962	2,347,040			Add \$1,229,613 during year
Collection Sewers-Gravity	5,979,802	6,159,802	6,069,802			Add \$180,000 during year
Services to Customers	121,702	121,702	121,702			
Flow Measuring Devices	37,961	37,961	37,961			
Other Plant & Misc. Equipment	1,469	1,469	1,469			
SYSTEM PUMPING PLANT						
Land & Land Rights	10,580	10,580	10,580			
Structures & Improvements	528,839	660,318	650,202			Added \$131,479 during year
Pumping Equipment	1,971,292	2,088,015	2,079,036			Add \$96,723 during year
TREATMENT & DISPOSAL PLT.						
Land & Land Rights	329,950	329,950	329,950			
Structures & Improvements	959,359	959,359	959,359			
Treatment & Disp. Equipment	1,016,215	1,016,215	1,016,215			
Plant Sewers	354,309	354,309	354,309			
Outfall Sewer Line	478,741	478,741	478,741			
Other Plant & Misc. Equipment	14,614	14,614	14,614			
RECLAIMED WATER TRT. PLT.						
Structures & Improvements	268,643	268,643	268,643			
Power generation equipment	337,306	337,306	337,306			
Reuse Distribution Reservoirs	208,730	208,730	208,730			
Treatment & Disposal Equipment	744,517	744,517	744,517			
Plant Sewers	499,027	499,027	499,027			
RECLAIMED WATER DIST. PLT.						
Structures & Improvements	768,093	768,093	768,093			
Reuse Meters & Meters Install.	159,188	159,188	159,188			
Reuse Trans. & Distribution	4,545,472	4,545,472	4,545,472			
GENERAL PLANT						
Land & Land Rights	7,840	7,840	7,840			
Office Furn. & Equipment	93,157	93,157	93,157			
Transportation Equipment	153,501	153,501	153,501			
Tools, shop & Garage Equip.	10,889	10,889	10,889			
Labatory Equipment	5,898	5,898	5,898			
Power Operated Equipment	53,239	53,239	53,239			
Communications Equipment	18,513	18,513	18,513			
Miscellaneous Equipment	4,564	4,564	4,564			
TOTALS	\$21,646,182	\$23,303,997	\$22,777,980			Added \$1,657,815 during year
Total Additions from 9/30/98 to 9/30/01 = \$9,576,847						

SUMMARY OF STARTING, ENDING AND 13 MONTH AVERAGE BALANCE OF WASTEWATER PLANT IN SERVICE

SUMMARY OF SCHEDULE A-4(B)						
					ENDING 9/30/00	Exhibit TLB-4B
	09/30/1999	09/30/2000	13 Mo. Avg.	Non-Used & Useful %	Non-Used & Useful Amount	COMMENTS
Franchises	\$3,095	\$3,095	\$3,095			
COLLECTION PLANT						
Land & Land Rights	208,414	208,414	208,414			
Structures & Improvements	216,914	216,914	216,914			
Collection Sewers-Force Mains	1,191,815	1,534,349	1,342,703			Add \$342,534 during year
Collection Sewers-Gravity	5,749,512	5,979,802	5,879,953			Add \$230,290 during year
Services to Customers	119,062	121,702	121,298			Add \$2,640 during year
Flow Measuring Devices	37,961	37,961	37,961			
Other Plant & Misc. Equipment	1,469	1,469	1,469			
SYSTEM PUMPING PLANT						
Land & Land Rights	10,580	10,580	10,580			
Structures & Improvements	77,173	528,839	111,917			Added \$451,666 during year
Pumping Equipment	726,948	1,971,292	867,280			Add \$1,244,344 during year
TREATMENT & DISPOSAL PLT.						
Land & Land Rights	329,950	329,950	329,950			
Structures & Improvements	959,359	959,359	959,359			
Treatment & Disp. Equipment	1,016,215	1,016,215	1,016,215			
Plant Sewers	354,309	354,309	354,309			
Outfall Sewer Line	478,741	478,741	478,741			
Other Plant & Misc. Equipment	14,614	14,614	14,614			
RECLAIMED WATER TRT. PLT.						
Structures & Improvements	16,819	268,643	36,190			Added \$251,824 during year
Power generation equipment	0	337,306	25,947			Added \$337,306 during year
Reuse Distribution Reservoirs	0	208,730	16,056			Added \$208,730 during year
Treatment & Disposal Equipment	0	744,517	57,271			Added \$744,517 during year
Plant Sewers	0	499,027	38,387			Added \$499,027 during year
RECLAIMED WATER DIST. PLT						
Structures & Improvements	8,000	768,093	66,469			Add \$760,093 during year
Reuse Meters & Meters Install.	12,500	159,188	23,784			Add \$146,688 during year
Reuse Trans. & Distribution	4,162,642	4,545,472	4,192,089			Add \$382,830 during year
GENERAL PLANT						
Land & Land Rights	7,840	7,840	7,840			
Office Furn. & Equipment	93,157	93,157	93,157			
Transportation Equipment	153,501	153,501	153,501			
Tools, shop & Garage Equip.	10,889	10,889	10,889			
Laboratory Equipment	5,898	5,898	5,898			
Power Operated Equipment	53,239	53,239	53,239			
Communications Equipment	18,513	18,513	18,513			
Miscellaneous Equipment	4,584	4,584	4,584			
TOTALS	\$16,043,713	\$21,646,202	\$16,758,586			Added \$5,602,489 during year

SUMMARY OF STARTING, ENDING AND 13 MONTH AVERAGE BALANCE OF WASTEWATER PLANT IN SERVICE

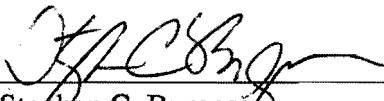
SUMMARY OF SCHEDULE A-4(C)						
					ENDING 9/30/99	Exhibit TLB-4C
	09/30/1998	09/30/1999	13 Mo. Avg.	Non-Used & Useful %	Non-Used & Useful Amount	COMMENTS
Franchises	\$3,095	\$3,095	\$3,095			
COLLECTION PLANT						
Land & Land Rights	208,414	208,414	208,414			
Structures & Improvements	216,914	216,914	216,914			
Collection Sewers-Force Mains	994,238	1,191,815	1,069,505			Add \$197,577 during year
Collection Sewers-Gravity	5,399,808	5,749,512	5,521,951			Add \$349,704 during year
Services to Customers	85,337	119,062	102,920			Add \$33,725 during year
Flow Measuring Devices	26,712	37,961	31,913			Add \$11,201 during year
Other Plant & Misc. Equipment	1,469	1,469	1,469			
SYSTEM PUMPING PLANT						
Land & Land Rights	10,580	10,580	10,580			
Structures & Improvements	77,173	77,173	77,173			
Pumping Equipment	590,575	726,948	653,997			Add \$136,373 during year
TREATMENT & DISPOSAL PLT.						
Land & Land Rights	329,950	329,950	329,950			
Structures & Improvements	959,359	959,359	959,359			
Treatment & Disp. Equipment	984,570	1,016,215	987,004			Add \$31,645 during year
Plant Sewers	354,309	354,309	354,309			
Outfall Sewer Line	478,741	478,741	478,741			
Other Plant & Misc. Equipment	14,614	14,614	14,614			
RECLAIMED WATER TRT. PLT.						
Structures & Improvements	16,819	16,819	16,819			
RECLAIMED WATER DIST. PLT.						
Structures & Improvements	0	8,000	1,231			Add \$8,000 during year
Reuse Meters & Meters Install.	0	12,500	1,923			Add \$12,500 during year
Reuse Trans. & Distribution	2,677,400	4,162,642	2,909,543			Add \$1,485,242 during year
GENERAL PLANT						
Land & Land Rights	7,840	7,840	7,840			
Office Furn. & Equipment	66,085	93,157	82,784			Add \$27,072 during year
Transportation Equipment	134,815	153,501	141,135			Add 18,686 during year
Tools, shop & Garage Equip.	10,703	10,889	10,789			Add \$186 during year
Laboratory Equipment	5,898	5,898	5,898			
Power Operated Equipment	53,239	53,239	53,239			
Communications Equipment	18,513	18,513	18,513			
Miscellaneous Equipment	0	4,584	4,213			Add \$4,584 during year
TOTALS	\$13,727,170	\$16,043,713	\$14,275,835			Added \$2,316,543 during year

CERTIFICATE OF SERVICE
DOCKET NO. 991643-SU

I HEREBY CERTIFY that a copy of the foregoing Prefiled Testimony of Ted L. Bidby,
P.E./P.L.S. has been furnished by U.S. Mail or *hand-delivery to the following parties this 31st
day of July, 2000.

Ralph Jaeger*
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