

ORIGINAL

DOCKET NO. 990696-WS - APPLICATION FOR ORIGINAL CERTIFICATES TO OPERATE WATER AND WASTEWATER UTILITY IN DUVAL AND ST. JOHNS COUNTIES BY NOCATEE UTILITY CORPORATION.

DOCKET NO. 992040-WS - APPLICATION FOR CERTIFICATES TO OPERATE A WATER AND WASTEWATER UTILITY IN DUVAL AND ST. JOHNS COUNTIES BY INTERCOASTAL UTILITIES, INC.

WITNESS: DIRECT TESTIMONY OF SCOTT TRIGG, APPEARING ON BEHALF OF STAFF

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FPSC-RECORDS/REPORTING

DIRECT TESTIMONY OF SCOTT TRIGG

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2 | Q. Please state your name and business address.

3 | A. My name is Scott Trigg, and I am Professional Engineer III Program  
4 | Supervisor for the Potable Water Section in the Northeast District of the  
5 | Florida Department of Environmental Protection (DEP). My business address is  
6 | 7825 Baymeadows Drive, Jacksonville, Florida 32256.

7 | Q. Please state a brief description of your educational background and  
8 | experience.

9 | A. I have a Civil Engineering Degree from Florida Institute of Technology  
10 | (1992). I have been with DEP for 7 1/2 years, 5 1/2 in the Potable Water  
11 | Section (Section). I have experience as an Inspector/Permitting Engineer  
12 | (1992-96). I have been the Permitting Supervisor since May 1998 and became  
13 | a Program Supervisor in January 1999.

14 | Q. What are your general responsibilities at the DEP?

15 | A. As Program Supervisor, I supervise 12 positions and perform  
16 | administrative functions for the Section. I review and oversee all compliance  
17 | and enforcement activities. I am also the permitting supervisor and certify  
18 | (sign and seal) all permits for the Section.

19 | Q. Have you testified on behalf of the DEP in previous Public Service  
20 | Commission (Commission) proceedings?

21 | A. No.

22 | Q. What is the purpose of your testimony in this docket?

23 | A. The purpose of my testimony is to provide information on the technical  
24 | ability of Intercoastal Utilities, Inc. (Intercoastal) to provide water  
25 | service to the area at issue in the original certificates application filed

1 | by Nocatee Utility Corporation (NUC). My testimony will address the specific  
2 | concerns the DEP has with respect to water in this area and the ability of  
3 | Intercoastal to address and satisfy these concerns.

4 | Q. Would you explain what you mean by concerns relating to water by the  
5 | DEP?

6 | A. Yes. The area is experiencing increasing salt water intrusion;  
7 | therefore, the permitting of new water wells and the withdrawals from existing  
8 | wells is being more closely monitored by the DEP and the Water Management  
9 | District (WMD).

10 | Intercoastal's level of sulfates has increased over the past several  
11 | years, but remains at approximately 60% of the MCL based on 1997 data.  
12 | Chlorides have consistently shown to be low and are not a problem.  
13 | Intercoastal has only deep wells.

14 | The water quality of Intercoastal is satisfactory and meets all the  
15 | water quality standards required by the DEP based on our most recent  
16 | compliance testing. Sulfates and chlorides are secondary standards which are  
17 | considered mostly for aesthetic purposes and sodium is a primary standard  
18 | which is considered for health effects.

19 | Q. Would you discuss the ability of Intercoastal to provide water to the  
20 | area at issue?

21 | A. Intercoastal has two water plans gridded together to serve one  
22 | distribution system. Based upon current information in the DEP files, the  
23 | maximum rated capacity of both plants combined is approximately 4.75 MGD.  
24 | Based upon the previous 12 months of data, Intercoastal's maximum daily flow  
25 | was 3.7 MGD. It has uncompleted projects estimated to be 0.250 MGD. This

1 | places its system at approximately 78% of capacity and leaves it with a  
2 | reserve of 1.05 MGD. A permit was issued in January 2000 to expand its  
3 | treatment facilities to a maximum daily capacity of 9.0 MGD.

4 | Intercoastal has an excellent history of compliance and has adequate  
5 | staff to provide water to the area at issue.

6 | Q. From a safety, water quality, system reliability, and customer service  
7 | standpoint, would the customers in the proposed area be better served by JEA  
8 | or Intercoastal?

9 | A. To my knowledge, Intercoastal has not had any past problems in regard  
10 | to safety, water quality, reliability, or customer service that would indicate  
11 | that the customers would be better served by JEA. Although the DEP does not  
12 | regulate JEA directly, I am aware that JEA is a larger utility and has its own  
13 | laboratory facility and personnel. I believe that the customers of the  
14 | proposed area would be well served by either utility.

15 | Q. Do you have any other comments on the ability of Intercoastal to provide  
16 | water service to the area at issue?

17 | A. No, not at this time.

18 | Q. Does this conclude your testimony?

19 | A. Yes.

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