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September 11, 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 Rebuttal 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 MS Word for Windows 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

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**REBUTTAL 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

September 11, 2000

DOCUMENT NUMBER-DATE

11255 SEP 11 8

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Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

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

Q. ARE YOU THE SAME TED L. BIDDY WHO FILED DIRECT TESTIMONY IN THIS CASE ON JULY 31, 2000?

A. Yes I am.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to offer comments on the testimony of Public Service Commission (PSC) Staff witness David G. MacColeman of the Compliance/Enforcement Section of the Domestic Wastewater Section of the Florida Department of Environmental Protection (FDEP) Tampa Office.

Q. WHAT ARE YOUR COMMENTS ON MR. MACCOLEMAN'S TESTIMONY?

A. My comments will address the answers to questions which Mr. MacColeman gave when asked about the normal Aloha System wastewater flow and when asked whether the Infiltration and Inflow (I/I) in Aloha's system was excessive.

Q. WHAT IS YOUR COMMENT CONCERNING MR. MACCOLEMAN'S ANSWER TO THE QUESTION ABOUT THE NORMAL ALOHA SYSTEM WASTEWATER FLOW?

A. Mr. MacColeman was asked if FDEP considered 150 gallons per day (GPD) per equivalent residential connection (ERC) to be normal for the Aloha System to

1 which he answered, yes. My comment is that Mr. MacColeman was speaking of
2 the “normal” average daily flow (ADF) which an engineer would use in the
3 design of future upgrades to the Aloha treatment facilities and that he was not
4 speaking of the actual historic or projected ADF for the Aloha treatment plant.
5 Mr. MacColeman certainly knows that the Annual ADF of the Aloha System for
6 the historic test year ended September 30, 1999 was 134 GPD per ERC and that
7 the average ADF of the six years preceding 1999 was also 134 GPD per ERC, as
8 shown in Schedules F-2 and F-10 of the MFRs. Mr. MacColeman was simply
9 agreeing to a nominal value which would be recommended for engineering
10 design for future upgrades of the Aloha System. His agreement that 150 GPD
11 per ERC was normal for the Aloha System was in no way in reference to actual
12 historic flows or projected 5 year margin reserve growth period flows which are
13 used in calculating the used and useful percentages for the existing Aloha
14 wastewater treatment plant.

15 **Q. WHAT IS YOUR COMMENT CONCERNING MR. MACCOLEMAN’S**
16 **ANSWERS TO THE QUESTIONS DEALING WITH WHETHER**
17 **ALOHA HAS EXCESSIVE I/I IN ITS COLLECTION SYSTEM?**

18 A. Mr. MacColeman answered the question, “What does DEP consider excessive
19 I/I”, by saying that, “FDEP accepts engineering standards for infiltration and
20 inflow.” And “Excessive flows are those flows which interfere with the
21 treatment process.” Mr. MacColeman did not go on to say, as he could have to
22 have made his answer more clear, that the FDEP long ago adopted into its rules

1 for collection systems, the “Recommended Standards for Wastewater Facilities”
2 as reported by the “Great Lakes-Upper Mississippi River Board of State Public
3 Health and Environmental Managers.” (Also known as the “Ten States
4 Standards”)

5 These standards are hard and fast rules of FDEP which are enforced rigidly by
6 FDEP for wastewater facilities. The “engineering standards” which Mr.
7 MacColeman referred to in his answer are indeed these Ten States Standards
8 which include the rule for infiltration in Chapter 30, Section 33 at Paragraph
9 33.93 on page 30-6 as follows:

10 **33.93 Water (Hydrostatic) Test**

11 **The leakage exfiltration or infiltration shall not exceed 200**
12 **gallons per inch of pipe diameter per mile per day (0.019**
13 **m³/mm of pipe dia./km/day) for any section of the system.**

14 **An exfiltration or infiltration test shall be performed with a**
15 **minimum positive head of 2 feet (610 mm).**

16 Since Aloha has approximately 35 miles of mostly 8-inch sewers in its
17 collection system, the limit of infiltration by the Ten States Standards rule
18 quoted above would be as follows:

19
$$\text{Infiltration Limit} = (200) \times (8) \times (35) = 56,000 \text{ GPD}$$

20 Since Aloha has already eliminated 140,000 GPD of infiltration from its system
21 through repairs to the “a” small portion of the system and we have estimated that
22 at least another 140,000 GPD will be found and eliminated as the remainder of

1 the system is examined, it is obvious that Aloha has excessive I/I in its collection
2 system.

3 Mr. MacColeman's further answer that, "Excessive flows are those flows which
4 interfere with the treatment process", is directly to the point since Aloha is being
5 forced to increase its treatment plant capacity by the Amended and Restated
6 Consent Final Judgement partially because the treatment facilities are not
7 adequate to serve present customers. Mr. MacColeman's answer to the capacity
8 question on page 2, lines 13 through 15 makes clear that the plant capacity is not
9 adequate to meet current flows. My calculations of ADF without the excessive
10 I/I as shown in Exhibit TLB-3 of my direct testimony makes it clear that the
11 plant would have the capacity to treat current flows if all the excessive I/I was
12 eliminated. Therefore, by any definition, the I/I which has been found and
13 eliminated and the estimated future I/I which will be eliminated from the system
14 would have to be classified as excessive.

15 Furthermore, Mr. MacColeman states that his Department was also aware of
16 inflow to the Aloha System during storm events which caused operational
17 problems.

18 In summary, the mere fact that Mr. MacColeman would not give an amount of
19 excessive I/I does not mean that Aloha's I/I is not excessive. As Mr.
20 MacColeman states on page 4 of his testimony at line 17, "The extent of
21 infiltration was not known by the Department."
22

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2 **Q. DO YOU HAVE ANYTHING FURTHER TO ADD CONCERNING THIS**
3 **MATTER?**

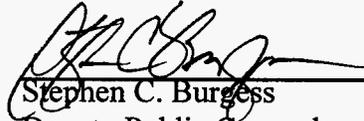
4 **A. No.**

CERTIFICATE OF SERVICE
DOCKET NO. 991643-SU

I HEREBY CERTIFY that a copy of the foregoing Rebuttal Testimony of Ted L. Bidly, P.E./P.L.S. has been furnished by U.S. Mail or *hand-delivery to the following parties this 11th day of September, 2000.

Ralph Jaeger*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

F. Marshall Deterding, Esquire
Rose, Sundstrom and Bentley, LLP
2548 Blairstone Pines Drive
Tallahassee, Florida 32301



Stephen C. Burgess
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