

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of Allied Universal )  
Corporation and Chemical Formulators, )  
Inc. against Tampa Electric Company )  
for violation of Sections 366.03, )  
366.06(2) and 366.07, Florida Statutes, )  
with respect to rates offered under )  
Commercial/Industrial Service Rider tariff; )  
petition to examine and inspect confidential )  
information; and request for expedited )  
relief. )  
\_\_\_\_\_ )

Docket No. 000061-EI

**REBUTTAL TESTIMONY**

**OF**

**PETER DE ANGELIS**

**ON BEHALF OF**

**ALLIED UNIVERSAL CORPORATION**

**AND**

**CHEMICAL FORMULATORS, INC.**

**January 22, 2001**

DOCUMENT NUMBER-DATE

00931 JAN 22 2001

FPSC-RECORDS/REPORTING

1       **Q.     Please state your name and address.**

2       A.     My name is Peter De Angelis. My address is 5700 Verlaine Court,  
3             Tallahassee, Florida 32308.

4       **Q.     What is your occupation?**

5       A.     I am self-employed as a consultant, doing business as CEP Associates. I am  
6             a chemist by profession, and I have 34 years of experience in the design,  
7             construction and operation of chlor-alkali manufacturing plants. A copy of  
8             my resume is attached to my testimony as Exhibit\_\_ (PD-1).

9       **Q.     On whose behalf are you testifying?**

10      A.     I am testifying at the request of Allied Universal Corporation ("Allied") and  
11             its affiliate, Chemical Formulators, Inc. I have been employed as a  
12             consultant by Allied since April, 1999.

13      **Q.     Have you previously submitted testimony in this proceeding or in any**  
14             **other proceeding before this Commission?**

15      A.     No, I have not.

16      **Q.     What is the purpose of your testimony?**

17      A.     The purpose of my testimony is simply: [REDACTED]  
18             [REDACTED]  
19             [REDACTED]  
20             [REDACTED]  
21             [REDACTED]  
22             [REDACTED]

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

REDACTED TEXT

1

2

3

REDACTED TEXT

4

5

6

7

8

9       **Q.     Does this conclude your testimony?**

10      A.     Yes.

11

Allied/CFI  
Docket No. 000061-EI  
Prefiled Rebuttal Testimony of Peter De Angelis  
Exhibit \_\_ (PD-1)

**CEP ASSOCIATES**  
CONSULTANTS  
5700 VERLAINE COURT  
TALLAHASSEE, FLORIDA 32308  
-----  
850-942-6532

**EDUCATION:** BA Hofstra University

**ASSOCIATIONS:** Chlorine Institute  
American Chemical Society  
Certified Arbitrator - BBB

**SERVICES:** Perform chlorine and hazardous chemical handling safety audits for users. Recommend improved safety methods and procedures.

Hold safety seminars for hazardous chemical users. Train operators, maintenance and emergency personnel on safe chlorine handling and emergency procedures.

Investigate chlorine releases at client facilities and recommend corrective actions to prevent recurrence.

Assist in selection of equipment and design of new chlorine production plants.

CEP has worked and is presently working for:

Paper Mills, Chlorine Repackagers, Chlorine Producers, Bleach Manufacturers, Water Treatment Facilities, and Specialty Chemical Manufacturers.

**ACHIEVEMENTS:** Two patents for water pollution control systems.

Appointed to Hazardous Waste Task Force by Governor. Report to Governor 1981.

Chairman of Maine Low Level Radioactive Waste Authority. Served from 1987 through 1992

**EXPERIENCE:**

1982 to Date President of CEP Associates, a consulting firm specializing in production and safe handling of hazardous chemicals. With extensive experience in the chlor-alkali industry.

1978-1982 Director of Manufacturing: International Minerals and Chemical Corporation. Responsible for three chemical plants in three states. Manufacturing, Environmental, Engineering and Accounting reported to me.

1966-1978 Plant Manager: Supervised design, construction and start up of a 200 TPD chlor-alkali plant in Maine. Manufacturing and Environmental responsibility with a staff of 62 people.

1956-1966 Production Supervisor: FMC Corporation. Experience in multi unit chemical plant supervision.

1951-1956 Pilot: United States Air Force.