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July 5, 1994

**ORIGINAL  
FILE COPY**

HAND DELIVERED

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
101 East Gaines Street  
Tallahassee, Florida 32399-1400

Re: Petition for Interim and Permanent Rate Increase in Franklin County, Florida  
by St. George Island Utility Company, Ltd., FPSC Docket No. 940109-WU.

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of the  
Prehearing Statement of St. George Island Utility Co., Ltd.

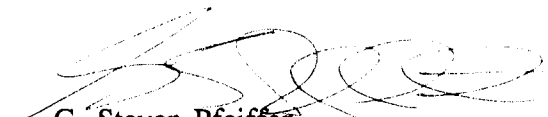
Please acknowledge receipt and filing of the above by stamping the duplicate copy of  
this letter and returning it to the undersigned.

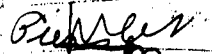
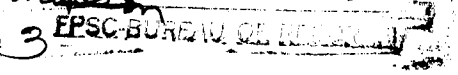
ACK  \_\_\_\_\_  
APP  2 Thank you for your assistance.

APP \_\_\_\_\_  
CMT \_\_\_\_\_  
CMT \_\_\_\_\_  
CTR \_\_\_\_\_


Sincerely,

APGAR, PELHAM, PFEIFFER  
& THERIAQUE

  
G. Steven Pfeiffer

GSP/rd \_\_\_\_\_  
Enclosure \_\_\_\_\_

  
Willis  
GTH \_\_\_\_\_

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Interim and ) DOCKET NO. 940109-WU  
Permanent Rate Increase in )  
Franklin County, Florida by )  
ST. GEORGE ISLAND UTILITY )  
COMPANY, LTD. )  
\_\_\_\_\_ )

**PREHEARING STATEMENT OF ST.  
GEORGE ISLAND UTILITY CO., LTD.**

The Applicant ST. GEORGE ISLAND UTILITY COMPANY, LTD. ("SGIU"), by and through its undersigned counsel, in accordance with The Commission's Order Establishing Procedure entered March 21, 1994, as modified by subsequent orders, files this Prehearing Statement.

**A. The Name of All Known Witnesses That May be Called by SGIU, and the Subject Matter of Their Testimony.**

1. Gene D. Brown

Mr. Brown is President of two corporate general partners of Leisure Properties, Ltd., which is the general partner of SGIU. He is also Manager and attorney for SGIU.

Mr. Brown will testify generally regarding the management and operation of SGIU, including improvements that have been put in place since the last rate case in 1989. He will testify regarding management fees, personnel needs, employee salaries and benefits and quality of service. He will rebut testimony filed by Public Counsel and by the Commission

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

Staff.

2. Frank Seidman

Mr. Seidman is a consultant in the utility regulatory field. He serves as President of Management and Regulatory Consultants, Inc.

Mr. Seidman will support SGIU's "Minimum Filing Requirements," and SGIU's "Response to Audit Exceptions." He will offer conclusions regarding SGIU's rate base, operating revenue, cost of capital, operating income, rates and charges and revenue requirements. He will rebut testimony filed by Public Counsel and by the Commission staff.

3. Jeanie Drawdy

Ms. Drawdy is an accountant who has performed accounting services to SGIU on a contract basis since 1992. She will testify regarding SGIU's books and records and offer the opinion that SGIU's books and records are in substantial compliance with USOA standards and requirements.

4. Sandra Chase

Ms. Chase is the office manager of SGIU. She will testify regarding the day-to-day operations of the utility, including employee benefits, travel reimbursements, and bad debt analysis. She will rebut testimony offered by Public Counsel.

5. Hank Garrett

Mr. Garrett is the Operations Manager for SGIU. He will testify regarding day-to-day operations of SGIU, including personnel needs, travel reimbursement, and equipment needs. He will rebut testimony offered by Public Counsel.

6. Wayne Colony

Mr. Colony is a consulting engineer with substantial experience in the area of water and sewer service systems. He will testify regarding his prior analysis of the rate base of SGIU, and with regard to capacity and quality of service. He will rebut testimony filed by Public Counsel and by Commission Staff.

7. Barbara S. Withers

Ms. Withers is a Certified Public Accountant who has a retainer agreement to provide service to SGIU. She will offer an opinion that SGIU's books and records are maintained in substantial compliance with applicable requirements and in support of SGIU's Response to Audit Exceptions.

8. Gary Williams

Mr. Williams is a representative of the Florida Rural Water Association. He will testify regarding quality of service provided by SGIU and the capacity of the system.

9. Ted Bidy

Mr. Biddy is an engineer with Baskerville, Donovan, a consulting engineering firm that undertook an analysis of the SGIU system to determine its capacity and operational needs. The witness will testify regarding the quality of service provided by the utility and the capacity of the system.

**B. A Description of All Known Exhibits that May be Used by SGIU and the Witness Sponsoring Each Exhibit.**

1. SGIU Minimum Filing Requirements.

The exhibit is in three volumes, will be offered as a composite exhibit and will be sponsored by the witness Frank Seidman.

2. SGIU's Response to Audit Exceptions.

This exhibit will be sponsored by the witness Frank Seidman.

3. Documents Prepared by Les Thomas Consulting Engineers Relating to contractual services with SGIU.

This exhibit will be offered as a composite exhibit. It relates to services in permit proceedings before the NFWFMD; a fire protection analysis; and a water system capacity analysis, including recommendations to meet service demands through the year 2010. The Exhibit will be sponsored by the witness Gene Brown.

4. Documents Establishing SGIU's Pension Plan.

This exhibit will be offered as a composite exhibit and will be sponsored by the witness Gene Brown.

5. Documents Relating to Insurance.

This exhibit will be offered as a composite exhibit and will be sponsored by the witness Gene Brown.

6. Other Documents.

SGIU has not completed its prefiled rebuttal testimony. The testimony will be filed on July 7, 1994. SGIU reserves the right to supplement this exhibit list as necessary to support prefiled rebuttal testimony. Copies of all such exhibits will be provided to all parties on July 7, 1994.

**C. Statement of Basic Position In the Proceeding.**

SGIU is seeking a rate increase arising from the facts that as adjusted for the test year ending December 31, 1992, SGIU has operated at a net loss in its water operations, and that in order to meet needs of its customers SGIU desires to implement programs to ensure continued provision of good quality service. SGIU proposes to increase its water operating revenues in order to meet customer needs and in order to produce a reasonable rate of return on its rate base.

**D. Statement of Questions of Fact At Issue, SGIU's Position on Each Issue, and Identification of Witnesses Who Will Address the Issue.**

The parties are working toward an "Issue Statement" that will set out issues of fact and specify issues that the parties have resolved through stipulation. What follows is the most recent iteration of this Statement. It is anticipated that the

Statement will be refined prior to the Prehearing Conference, and that additional issues will be resolved by stipulation.

**(1) Issues Related to Quality of Service**

ISSUE 1: Is the quality of service provided by SGIU satisfactory?

SGIU Position: Yes.

SGIU Witness: Gene Brown, Frank Seidman, Wayne Colony, Hank Garrett, Ted Bidy, and Gary Williams.

**(2) Issues Related to Rate Base**

ISSUE 2: Should plant in service be reduced by \$2,067 per Audit Exception No. 5?

SGIU Position: SGIU does not take exception to the Audit Exception as expressed in this issue.

SGIU Witness: Frank Seidman.

ISSUE 3: Should plant in service be reduced by \$12,665 as stated in Audit Exception No. 6?

SGIU Position: SGIU contends that a reduction in the amount of \$10,774 is appropriate.

SGIU Witness: Frank Seidman.

ISSUE 4: Should plant in service be reduced by \$876 for unsupported costs associated with the third well per Audit Exception No. 9?

SGIU Position: SGIU does not take exception to the Audit Exception as expressed in this issue.

SGIU Witness: Frank Seidman.

ISSUE 5: Should plant in service be reduced by \$2,370 for the duplicative recording of Coloney Company invoices as stated in Audit Exception No. 10?

SGIU Position: Yes. SGIU does not take exception to the Audit Exception as expressed in this issue.

SGIU Witness: Frank Seidman

ISSUE 6: Should an adjustment be made to increase plant in service by \$1,941 as shown in Audit Exception 11 for

the recording of the utility's new generator?

SGIU Position: Yes. SGIU does not take exception to the Audit Exception as expressed in this issue.

SGIU Witness: Frank Seidman.

ISSUE 7: Should plant in service be reduced by \$12,518 to remove costs associated with the 50,000 gallon storage tank as stated in Audit Exception No. 12?

SGIU Position: Yes. SGIU does not take exception to the Audit Exception as expressed in this issue.

SGIU Witness: Frank Seidman.

ISSUE 8: Should plant in service be adjusted for plant retirements as stated in Audit Exception No. 8?

SGIU Position: Yes. SGIU does not take exception to Audit Exception No. 8.

SGIU Witness: Frank Seidman.

ISSUE 9: Should the SGIU utility pro forma adjustment of \$21,000 for engineering design fees, as stated in Audit Exception 14, be removed?

SGIU Position: No. SGIU has provided documentation in its response to Audit Exception No. 9. The Coloney Company fees are not a duplication of expenses and have never been capitalized or expensed.

SGIU Witness: Frank Seidman.

ISSUE 10: Should plant in service be reduced by \$4,393 as stated in Audit Exception No. 7?

SGIU Position: No. SGIU disagrees that transportation costs are not plant, but agrees that finance charges are not plant, except to the extent they may be reflected in AFUDC (USOA Accounting Instruction No. 14). Leasehold improvements are a proper component of utility plant (USOA Accounting Instruction 18), however, SGIU agrees that the cost of the improvement should be adjusted to reflect only the portion allocated to utility use. The position of SGIU and Staff differ by \$647.

SGIU Witness: Frank Seidman.

ISSUE 11: Should the land account be reduced by \$570 to remove



non related charges per Audit Exception No. 4?

SGIU Position: Yes. SGIU agrees with this adjustment reflected in the exception.

SGIU Witness: Frank Seidman.

ISSUE 12: Should rate base be reduced by \$1,104 to reflect the actual cost of the elevated storage tank land per Disclosure No. 1?

SGIU Position: No.

SGIU Witness: Frank Seidman.

ISSUE 13: What used and useful adjustments, if any, are appropriate?

SGIU Position: SGIU has reached an agreement with Staff regarding the correct used and useful adjustment.

SGIU Witness: Gene Brown, Frank Seidman, Wayne Colony.

ISSUE 14: Should adjustments be made to land and CIAC as stated in Audit Exception No. 13?

SGIU Position: This adjustment will be appropriate when SGIU receives a bill of sale for the contributed property, and the transaction should at that time be recorded on the Utility's books.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 15: Is an adjustment necessary to increase CIAC to record contributions from Department of Natural Resources for Rattlesnake Cove?

SGIU Position: No. SGIU does not believe that the agency made contributions as expressed in the Issue. If payments were made, the adjustment would be appropriate.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 16: Should an adjustment be made to impute the full amount of CIAC for 30 lots not recorded at the required charge according to Audit Exception No. 17?

SGIU Position: No. Although the fees for the 30 lots in question were recorded on the books in 1991, they are fees for customers in service prior to the last rate case order in 1989 for which fees had not been

recorded.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 17: Should CIAC be increased by \$29,758.59 to record costs associated with contributions paid by St. George Island Volunteer Fire Department and Higdon and Bates?

SGIU Position: Some adjustment to CIAC in accordance with SGI's response to Audit Exception 18 is appropriate to reflect contributions, however, there is disagreement as to the appropriate offset. Furthermore, the costs of hydrants installed with these funds were expensed and never recorded as plant in service. Correcting entries to record these entries as CIAC must be accompanied by offsetting entries to record to plant in service the cost of the hydrants.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 18: Should Accumulated Amortization of CIAC be increased by \$10,635 according to Audit Exception No. 16?

SGIU Position: SGIU and the Staff agree as to the methodology to be followed in determining this issue, and agree that the correct increase will be determined based upon the determination of other issues.

SGIU Witness: Frank Seidman.

ISSUE 19: Should Advances for Construction be decreased by \$9,257 as stated in Audit Exception No. 20?

SGIU Position: Yes. SGIU does not take exception to the Audit Exception as expressed in the issue.

SGIU Witness: Frank Seidman.

ISSUE 20: What is the appropriate working capital allowance?

SGIU Position: SGIU agrees that Rule 25-30.430(2) sets the means for computing working capital allowance, and that the resolution of the issue depends on the resolution of other issues.

SGIU Witness: Frank Seidman.

ISSUE 21: What is the appropriate level of test year rate base.

SGIU Position: This issue will be determined based upon the resolution of other issues.

SGIU Witness: Frank Seidman.

**(3) Issues Relating to Cost of Capital**

ISSUE 22: Should the cost rate for customer deposits be adjusted?

SGIU Position: SGIU agrees that Commission Rule 25-30.111 sets the standards for resolving this issue.

SGIU Witness: Frank Seidman.

ISSUE 23: What is the appropriate capital structure for ratemaking purposes?

SGIU Position: The resolution of this issue depends upon the resolution of other issues.

SGIU Witness: Frank Seidman.

ISSUE 24: What is the cost of common equity capital?

SGIU Position: The resolution of this issue depends upon the resolution of other issues.

SGIU Witness: Frank Seidman.

ISSUE 25: What is the weighted average cost of capital including the proper components, amounts, and cost rates associated with the appropriate capital structure?

SGIU Position: The resolution of this issue depends upon the resolution of other issues.

SGIU Witness: Frank Seidman.

**(4) Issues Relating to Operating Income**

ISSUE 26: Should material and supplies be reduced by \$4,851 as stated according to Audit Exception No. 22?

SGIU Position: Yes, SGIU agrees with the Audit Exception as expressed in the issue.

SGIU Witness: Frank Seidman.

ISSUE 27: Should employee salaries and wages be reduced.

SGIU Position: No. The utility has a second field assistant who is working full time. This second assistant is needed to ensure that the utility is able to provide needed attention to the system on a 24-hour basis. Maintaining fair compensation for the

utility's employees is vital to maintaining consistency in the utility's operations.

SGIU Witness: Gene Brown, Frank Seidman, Hank Garrett.

ISSUE 28: Should pension and benefits be reduced?

SGIU Position: No. Operational problems that the utility has experienced in the past have in many instances been a direct result of losing good employees to better paying jobs. Establishing a pension program is both fair to the employees and will serve as a significant inducement to keep them working with the utility. SGIU has a funded pension plan in place.

SGIU Witness: Gene Brown, Frank Seidman, Hank Garrett.

ISSUE 29: Should an adjustment be made to reduce engineering contractual services by \$1,959 as suggested in Audit Disclosure No. 6?

SGIU Position: No. SGIU's retainer payment relationship with Wayne Colony offers substantial benefits to SGIU at a cost that is less than would result from employing the services on an as-needed basis.

SGIU Witness: Gene Brown, Frank Seidman, Wayne Colony.

ISSUE 30: Should an adjustment be made to reduce legal contractual services?

SGIU Position: No. The availability of legal services on an on going basis is a valuable service for the utility, and is less expensive than employing counsel at hourly rates on an as needed basis. On account of improved management of the company, and the likelihood of reduced need for on going legal services, SGIU agrees to reduce its legal fees to \$1,000 per month.

SGIU Witness: Gene Brown.

ISSUE 31: Should an adjustment be made to reduce management fees?

SGIU Position: SGIU needs to ensure that an allocation for management is maintained at a sufficient level to ensure that a qualified manager can be employed and kept. SGIU will offer testimony regarding the appropriate level of compensation.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 32: Should test year contractual services-other be reduced by \$3,873 per Audit Exception No. 24?

SGIU Position: Yes. SGIU does not take issue with the Audit Exception as expressed in the issue.

SGIU Witness: Frank Seidman.

ISSUE 33: Should an adjustment be made to reduce the utility's pro forma adjustment for contractual services-other for storage tank maintenance, pipe cleaning, testing and uniforms.

SGIU Position: There is no rule or policy that requires the utility to bid these services. SGIU will offer quotes from various vendors to support the proforma adjustment.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 34: Should an adjustment be made to reduce the rent for the Tallahassee office per Audit Disclosure 10.

SGIU Position: No. The utility pays a competitive, fair rate for lease of office space in Tallahassee. In addition, the utility has use of office space for which it pays no rental.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 35: Should transportation expenses be reduced?

SGIU Position: No. While the utility has not maintained travel logs, the travel allowance is a fair means for compensating employees for travel in a manner than minimizes paper work and does not result in more money being paid for travel than actually occurs. The system is less expensive than purchasing vehicles. The utility will produce travel logs for some employees as requested at the hearing to substantiate its travel allowances.

SGIU Witness: Gene Brown, Frank Seidman, Sandra Chase, Hank Garrett.

ISSUE 36: Should an adjustment be made to reduce insurance expense since the utility does not have policies in effect?

SGIU Position: No. The utility does have policies in effect, and has received various price quotes to secure a fair price.

SGIU Witness: Gene Brown.

ISSUE 37: Should an adjustment be made to reduce chemical expenses by \$657 as shown in Audit Exception No. 21?

SGIU Position: Yes. SGIU does not take exception to the Audit Exception as expressed in the issue.

SGIU Witness: Frank Seidman.

ISSUE 38: Is St. George Island Utility Co. Ltd.'s level of unaccounted for water excessive, and if so, should adjustment be made to the chemical and purchased power expenses?

SGIU Position: No.

SGIU Witness: Gene Brown, Frank Seidman, Gary Williams.

ISSUE 39: Should bad debt expense be reduced to reflect a reasonable level?

SGIU Position: No. The expense reflects reality. Because of the fact that many SGIU customers are transitory residents who may have water service for only a few weeks or a few months, SGIU suffers higher than usual unpaid water bills. SGIU is not able to recoup these debts when new customers move in.

SGIU Witness: Gene Brown, Sandra Chase.

ISSUE 40: Should miscellaneous expenses be reduced?

SGIU Position: No. The cellular telephone is an important communication tool that enables SGIU to service its customers better. The corporate filing is for a corporate owner of SGIU. SGIU is a partnership. Because SGIU does not operate as a corporation customers are saved corporate income taxes and other costs of doing business as a corporation. The corporate structure of the partners is a necessary feature of SGIU doing business in a manner that saves its customers money.

SGIU Witness: Gene Brown, Sandra Chase, Hank Garrett.

ISSUE 41: What is the appropriate amount of rate case expense.

SGIU Position: SGIU contends that its estimates regarding rate case expense are reasonable and relate only to prudently incurred expenses. A detailed accounting of rate case expenses will be provided.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 42: Should an adjustment be made to amortization expenses for system analysis, aerator analysis, hydrological study, and fire protection study?

SGIU Position: No. The utility will provide documentation regarding the system analysis, the aerator analysis, and the hydrological study. The fire protection study is a prudent means for addressing the nature of improvements that would be needed to provide full fire protection so that SGI's customers can make an informed decision as to whether they wish to pay for that service.

SGIU Witness: Gene Brown, Frank Seidman, Gary Williams.

ISSUE 43: Should an adjustment be made to taxes other than income?

SGIU Position: This issue will be determined based upon resolution of other issues.

SGIU Witness: Frank Seidman.

ISSUE 44: What is the appropriate level of test year operating income?

SGIU Position: This issue will be determined based upon resolution of other issues.

SGIU Witness: Frank Seidman.

**(5) Issues Relating to Revenue Requirements**

ISSUE 45: What is the total revenue requirement?

SGIU Position: This issue will be determined based upon resolution of other issues.

SGIU Witness: Frank Seidman.

**(6) Issues Relating to Rates and Charges**

ISSUE 46: What are the appropriate rates and charges and their effective dates?

SGIU Position: This issue will be determined based upon resolution of other issues.

SGIU Witness: Frank Seidman.

ISSUE 47: Should the utility's service availability policy and charges be revised?

SGIU Position: SGIU contends that the service availability policy should not be revised; however, whether any revision is needed would be determined based upon resolution of other issues.

SGIU Witness: Frank Seidman.

ISSUE 48: Should the utility's service availability charges be escrowed?

SGIU Position: No.

SGIU Witness: Gene Brown, Frank Seidman.

ISSUE 49: What is the appropriate amount by which rates should be reduced four years after the established effective date is determined after the resolution of other issues.

SGIU Position: This issue will be determined based upon resolution of other issues.

SGIU Witness: Frank Seidman.

ISSUE 50: In determining whether any portion of the interim increase granted should be refunded, how should the refund be calculated, and what is the amount of the refund, if any?

SGIU Position: No refund is warranted. To the extent that any refund could be warranted, the issue will be determined based upon resolution of other issues.

SGIU Witness: Frank Seidman.

ISSUE 51: Should the utility's AFPI charge be adjusted?

SGIU Position: This issue will be determined based upon resolution of other issues.

SGIU Witness: Frank Seidman.

**(7) Other Issues**

ISSUE 52: Does the utility keep its books and records in substantial compliance with the Commission's Rules and Regulations? If not should it be penalized.

SGIU Position: As determined in the Audit, SGIU keeps its books and records in compliance with Commission rules



and regulations and accepted accounting principals.

SGIU Witness: Barbara Withers.

ISSUE 53: What is the number of ERC's that the utility is currently serving and what is the maximum number of ERC's that the utility is capable of serving while maintaining compliance with the regulatory agencies?

SGIU Position: SGIU will maintain capacity to serve anticipated growth for a number years.

SGIU Witness: Gene Brown, Wayne Coloney, Ted Bidy.

ISSUE 54: Is additional capacity required of the utility, and if so, what specific actions are required in order to achieve additional capacity?

SGIU Position: Additional capacity and actions needed to meet it will be determined by engineering analysis.

SGIU Witness: Gene brown, Wayne Coloney, Ted Bidy, Gary Williams.

ISSUE 55: Does the utility own the third well property and its improvements?

SGIU Position: Yes.

SGIU Witness: Gene Brown.

**E. Statement of Questions of Law At Issue, SGIU's Position on Each Issue.**

SGIU knows of no issues of law about which there is disagreement except as set out in pending motions.

**F. Statement of Policy Questions At Issue, SGIU's Position on Each Issue, and Witness Who will Address the Issue.**

1. Whether the Public Service Commission has any policy requiring utilities to obtain three bids for services the utility needs to provide quality service to its customers. SGIU knows of

no such policy and has seen no statement of the policy. Gene Brown and Frank Seidman will address the issue.

2. Whether the Public Service Commission has any policy requiring utilities to maintain travel logs in order to reimburse employees for travel expenses. SGIU knows of no such policy and has seen no statement of the policy. Gene Brown and Frank Seidman will address the issue.

**G. Statement of Issues that have been Stipulated to by the Parties.**

1. The parties have agreed upon a resolution of the appropriate "used and useful" calculation.

2. SGIU and the Staff have resolved many of the issues set out as factual issues above. It appears that stipulations have been reached regarding Issues 2, 4-8, 11, 13, 19-26, 32, 37, 43-46, 49, and 51. Further discussions should result in stipulations regarding other issues. A detailed statement will be available prior to the prehearing conference.

**H. Statement of Pending Motions.**

1. Public Counsel's Motion for Leave to File Supplemental Testimony.

2. Public Counsel's Motion to Compel.

3. SGIU's Motion to Compel.

4. SGIU's Motion in Limine.

**I. Statement of Procedural Requirements SGIU Cannot Comply With.**

SGIU will file its prefiled rebuttal testimony in accordance with an order of the Prehearing Officer on July 7, 1994. SGIU may file additional exhibits not identified in this statement as part of its prefiled rebuttal testimony.

Respectfully submitted this 5<sup>th</sup> day of July, 1994.



G. Steven Pfeiffer  
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& THERIAQUE  
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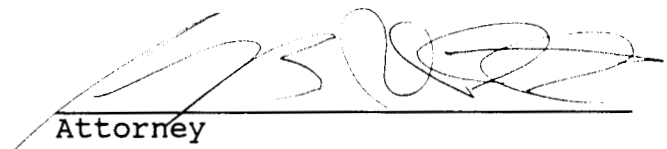
**-and-**

Gene D. Brown  
Florida Bar No. 096262  
3848 Killearn Court  
Tallahassee, Florida 32308  
Telephone: 904/668-6103

**Attorneys for St. George  
Island Utility Company, Ltd.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery to Robert Pierson and Suzanne Summerlin, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32399-0863; and to Harold McLean, Associate Public Counsel, Claude Pepper Building, Room 812, 111 West Madison Street, Tallahassee, Florida 32399-1400; and a copy has been furnished by U.S. Mail to Barbara Sanders, St. George Island Water and Sewer District, Post Office Box 157, Apalachicola, Florida 32320 this 5<sup>th</sup> day of July, 1994.



Attorney