2:05pm

## STATE OF FLORIDA PUBLIC SERVICE COMMISSION



IN RE:

Petition of SANLANDO UTILITIES CORPORATION For a Limited Proceeding to Implement Water Conservation Plan in Seminole County

Docket No.: 930256-WS

## PREHEARING STATEMENT

FLORIDA AUDUBON SOCIETY, Inc. and FRIENDS OF THE WEKIVA RIVER, by and through their undersigned representative, and pursuant to Rule 25-22.038 (3), Florida Administrative Code, and pursuant to that certain Order Establishing Procedure (Order No. PSC-94-0375-PCO-WS), hereby files their prehearing statement and state as follows:

## WITNESSES THAT MAY BE CALLED -- SUBJECT MATTER OF TESTIMONY

- 1. Audubon and Friends of the Wekiva may call Bernard J. Yokel Ph. D., President of the Florida Audubon Society. If called, he will testify about those matters contained in the direct testimony previously filed by Audubon and Friends of the Wekiva.
- Audubon and Friends of the Wekiva may call Nancy Prine. If called, she will
  testify about those matters contained in the direct testimony previously filed by Audubon and
  Friends of the Wekiva.
- 3. Audubon and Friends of the Wekiva may call Henry H. Fishkind, Ph.D. If called, he will testify about:
  - (a) Those matters contained in direct testimony previously filed by Audubon and s of the Wekiya

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DOCUMENT NUMBER-DATE 08825 AUG 26点 (b) Financial analyses related to Sanlando's reuse facility, financing structure, proposed rates, and inverted rate structure.

## **DESCRIPTION OF ALL EXHIBITS**

Audubon and Friends will rely on the exhibits produced by Sanlando and the St. Johns River Water Management District.

## FUNDAMENTAL POSITION OF AUDUBON AND FRIENDS IN THIS PROCEEDING

Audubon and Friends support the proposed Water Conservation Plan of Sanlando, and believe that this plan should be approved by the Florida Public Service Commission, believe that the plan is fair, and legally supportable.

#### QUESTIONS OF FACT THAT AUDUBON AND FRIENDS CONSIDER AT ISSUE

Audubon and Friends adopt the questions of fact stated by Sanlando.

#### **AUDUBON AND FRIEND'S POSITIONS ON EACH QUESTION OF FACT**

Audubon and Friends agree with the Positions stated by Sanlando.

### IDENTIFICATION OF WITNESSES THAT WILL ADDRESS EACH ISSUE OF FACT

- Issue 1: Bernard Yokel, Nancy Prine, Henry H. Fishkind
- Issue 2: Bernard Yokel, Nancy Prine, Henry H. Fishkind
- <u>Issue 3</u>: Henry H. Fishkind

QUESTIONS OF LAW THAT AUDUBON AND FRIENDS CONSIDERS AT ISSUE None.

POLICY QUESTIONS THAT AUDUBON AND FRIENDS CONSIDER AT ISSUE

None.

## ISSUES THAT HAVE BEEN STIPULATED TO BY ALL PARTIES

None.

## PENDING MOTIONS UPON WHICH AUDUBON AND FRIENDS SEEK ACTION

Motions to dismiss, regarding "Motion to Intervene" of Wekiva Golf Club.

# REASONS WHY AUDUBON AND FRIENDS CANNOT PROVIDE LISTED INFORMATION REFERENCED ABOVE

All information required to be included by the Order (Order No. PSC-9490375-PCO-WS) is included in this Prehearing Statement.

Respectfully Submitted,

Charles Lee

Senior Vice President Florida Audubon Society 460 Highway 436, Suite 200 Casselberry, Fl. 32707

(407) 260-8300

Representative of Florida Audubon Society and Friends of the Wekiva River, Inc.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the original and fifteen (15) copies of each of the foregoing prehearing statement were filed with the Division of Records and Reporting, Florida Public Service Commission, and one (1) true and correct copy of each Testimony was forwarded by United States Mail this 26th day of August, 1994 to the following parties of record:

Nancy B. Barnard, Esq. and Jennifer L. Burdick, Esq. Assistant General Counsel St. Johns River Water Mgt. Dist. P.O.B. 1429 Palatka, Fl. 32178-1429

John F. Lowndes, Esq. Cleatous J. Simmons, Esq. Lowndes, Drosdick, Doster, Kantor & Reed P.O.B. 2809 Orlando, Florida 32802

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Respectfully Submitted,

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