ORIGINAL

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE:

April 1, 1998

TO:

Division of Records and Reporting

Division of Legal Services (Gervasi)

FROM:

Edith Xanders, Division of Water and Wastewater

RE:

Docket No. 971186-SU: Application for approval of

reuse project plan and increase in wastewater rates

in Seminole County by Sanlando Utilities

Corporation

Please place the attached in the above referenced docket file. If you have any questions, please feel free to contact.

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March 24, 1998

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Ms. Rosanne Gervasi, Senior Attorney **Public Service Commission** Capital Service Office Center 2540 Shumard Oak Boulevard Tallahassee. Florida 32399-0850

Subject:

Sanlando Utilities Corporation

Dear Ms. Gervasi.

In response to your letter dated February 23, 1998, I am providing the following additional information regarding Sanlando Utilities Corporation's consumptive (water) use permit ("CUP"). Again, please do not hesitate to contact me at (904) 329-4491 should you have further questions regarding this project or this matter.

RESPONSES

I do not have any knowledge as to why Sabal Point has not submitted the required cost estimates. However, the District is currently following up on this as a compliance matter. When the District receives the estimates, I will forward them to you.

Question 2: Same as with question 1.

Ouestion 3: None of the permittees specified in your letter have submitted an economic feasibility study regarding this matter. However, the District is currently working with the permittees to obtain the needed information. Since it is not specifically required, I do not anticipate that an actual "feasible study" will be performed. Instead, the District will work with the permittees to resolve any outstanding issues and to get the information needed to resolve this matter.

The permittees will be allowed to keep the wells. However, use from the wells will be limited to emergency situations only. The District usually provides an allocation for back-up should reclaimed water become temporarily unavailable.

Sincerely.

Dwight T. Senkins, Esq. O.G.

Director, Division or Water Use Regulation

Department of Resource Management

Dan Roach, CHAIRMAN FERNANDINA BEACH

Kathy Chinoy, vice CHAIRMAN PONTE VEDRA

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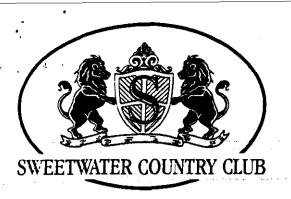
Otis Mason, SECRETARY

ST. AUGUSTINE

bc: Hal Wilkening
Jennifer Springfield



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D. Neil Bethea
Public Utilities Supervisor
Division of Water & Wastewater
2540 Shumard Oak Blvd.
Tallahassee, FL 323-0850

RE: Re-use water

March, 1998

Dear Sir:

The following information represents the impact of Sweetwater Country Club (SWCC) accepting and using re-use water. As you know, our St. Johns River Water Management District's Use Permit states that when re-use water is available and is technologically and economically feasible SWCC must accept its use. In pursuit of identifying our technical and economic feasibility we have discussed and/or consulted with Sanlando Utilities, Florida Department of Environmental Protection, and several experts in the field of Golf Course Turf Management. Our conclusion at this point is that the re-use program identified by Sanlando Utilities is technologically feasible based upon certain issues described below; and it will also be financially feasible if the steps outlined below are accepted by the organizations defined and delineated actions taken:

TECHNICAL FEASIBILITY:

Technical feasibility as measured by SWCC falls into three categories:

- 1) INSTALLATION: Our current understanding is that Sanlando Utilities will perform all activities (letter to Bob Elzer from Jerry Salsano dated 1-19-98) necessary to bring the re-use water to SWCC maintenance area. Additionally, Sanlando Utilities will perform all design and installation of a pumping station and its hook up to SWCC irrigation system. This installation will meet all Department of Environmental Protection requirements as defined in Florida Administrative Code 62-610 Part III. In addition, this installation will allow SWCC to switch between re-use water or on property well water (as currently used) by the manipulation of an on site Sanlando Utility designed and installed gate and check valve system. Following the installation of all components, SWCC affected grounds will be restored to pre-installation condition.
- 2) USE: From all experimentation and investigation to date, the usage aspect of re-use water by SWCC personnel, equipment, and grounds is acceptable. This is conditioned upon the following assumptions:

- A) The re-use water agreement between Sanlando Utilities and SWCC will not enforce a minimum quantity requirement.
- B) St. Johns River Water Management District will grant SWCC a use permit for the current wells.
- C) Our current fresh water system remains in tact and is an option for our use.
 - D) Sanlando re-use monitoring program provides an early warning alert to SWCC should re-use water become out of specification (specification to be jointly agreed upon between SWCC and Sanlando Utility).
 - 3) MAINTENANCE: Following the change over to low trajectory irrigation heads in a few locations near country club eating areas, we do not anticipate major changes in our sprinkler head maintenance program. Overall maintenance will be increased to closely monitor the water quality and impact of re-use water on our turf sensitive areas.

ECONOMIC FEASIBILTY:

Our agreement that re-use water is economically feasible will be based upon major assumptions we have made. These assumptions stem from discussions held with the various governmental departments and a survey of re-use water using golf courses in the Orlando area (survey conducted by Wekiva Golf Course). It appears from the survey results that de-facto precedent has been set wherein the re-use water supplying utilities have either provided funding or assumed the financial burden for the installation and operations of a re-use system on existing golf courses. If SWCC understanding of Florida Administrative Code 62-610 Part III, as informally defined to us by the Department of Environmental Protection, is correct, the financial burden of our irrigation system modification is quite small (less than \$1,000). Consequently, the financial question is: How is the expensive installation, operation, and monitoring of the re-use on-site pumping station and per 1000 gallon water cost paid for?

This is SWCC position on economic feasibility. We assume the rate case presented by Sanlando Utility (PSC Docket No. 971186-SU) currently before the Florida Public Service Commission, Public Utilities Supervisor D. Neil Bethea includes financial consideration for SWCC pumping station, installation, operation (including energy cost), and monitoring. As such, there will be no cost to SWCC. However, there are "other" costs to SWCC that must be considered.

- A) Cost of signage for the entrance and holes #I and 10, and change over of golf scorecard design (\$300/sign scorecards \$1650) to include note of re-use water. Estimate \$1950.00
- B) Changeover of golf course bathrooms' hand washing facilities to potable water. (Orange City Public Utilities, James Magwood, 836-7202, \$3171.88 plus pipe installation, etc.) Estimate \$5076.00
- C) Cost of re-use water per 1,000 gal. Estimate \$.22/1,000 gallons

D) Addition of second fertigation pump to re-use system. Estimate \$1375.00

If the cost of items A-D and the pump station installation, operation, and monitoring costs are not a SWCC cost; then the re-use project is economically feasible for SWCC.

Thank you for your attention to this most important issue. Please contact me for any interpretations of this letter or for additional information. I look forward to your response.

Sincerely,

Bob Elzer

General Manager

CC: Jerry M. Salsano, VP/GM Sanlando Utilities
Dwight T. Jenkins, Esq., St. Johns River Water Management District
Christianne C. Ferraro, Florida Department of Environmental Protection