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December 19, 2008

VIA HAND DELIVERY

Ms. Ann Cole, Director
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, FL 32399-0850

Re: *In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.*, Docket No. 080121-WS

Dear Ms. Cole:

On behalf of Aqua Utilities Florida, Inc. ("AUF"), enclosed for filing are the original and 9 copies of AUF's Notice of Filing Late-Filed Hearing Exhibit No. 191 (11/08 Flushing Data for Chuluota).

Please acknowledge receipt of this filing by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance.

Sincerely,

HOLLAND & KNIGHT LLP

Gigi Rollini

GR/cb
Enclosures
cc: Ralph Jaeger, Esq. (w/encl.)
Katherine Fleming, Esq. (w/encl.)
Caroline Klancke, Esq. (w/encl.)
Erik Sayler, Esq. (w/encl.)
Charles Beck, Esq. (w/encl.)
Cecilia Bradley, Esq. (w/encl.)
Kimberly A. Joyce, Esq.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.	)	**DOCKET NO. 080121-WS** **FILED: December 19, 2008**

AQUA UTILITIES FLORIDA, INC.'S NOTICE OF FILING
LATE-FILED HEARING EXHIBIT NO. 191

Aqua Utilities Florida, Inc. ("AUF"), by and through its undersigned counsel, gives notice of filing of AUF's Late-Filed Hearing Exhibit No. 191, which responds to the Office of Public Counsel's request to provide "a late-filed exhibit for November 2008 so that we can get a handle and understand a little more about the impact or the quantity of flushing" in Chuluota. (Hearing Transcript, vol. V, at 586.)

Respectfully submitted this 19th day of December, 2008.

HOLLAND & KNIGHT LLP

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-and-

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Attorneys for Aqua Utilities Florida, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was furnished by hand delivery to **Ralph Jaeger, Katherine Fleming, Caroline Klancke and Erik Sayler, Esq., Office of General Counsel, Florida Public Service Commission**, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, to **Charles Beck, Esq., Office of Public Counsel**, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, and to **Cecilia Bradley, Esq., Office of the Attorney General**, The Capitol–PL01, Tallahassee, FL 32399-1050, this 19th day of December, 2008.

Attorney

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REPORT ON 11/08 FLUSHING ACTIVITY IN CHULUOTA

Page 1 of the attached Water Flushing and Break Repair Record records the flushing that occurred system wide for Chuluota in November 2008. The accompanying documents detail what and where flushing occurred. Per the attached, November 11 and 19, 2008, were low-flow days, and increased flushing was required to turn over the water tanks.

The attached documents also demonstrate that one very important system management tool to control nitrification and to respond to "black water" conditions is flushing of the distribution system. As Witness Walker also explained at the rate hearing, (Tr.1003), flushing "is a reasonable beneficial use, and it is necessary to maintain distribution water quality."

Since July 2004, AUF has added 14 automatic flushing valves in the distribution system. These automatic valves flush predetermined amounts of water from the dead ends during hours of low use to keep the water from stagnating in the mains. These are critical for maintaining water quality at dead ends and extremities of the distribution system where nitrification would otherwise first occur.

As Witness Walker also explained, the St. Johns Management District staff is aware of AUF's flushing program and they have no evidence that the flushing program is causing harm to wetlands. (Tr.986.) As Witness Luitweiler explained, AUF is not flushing water in any wetlands. (Tr.1133).

Witness Luitweiler also explained at the hearing that a plan has been developed by Dr. Taylor to monitor and sample the distribution system to obtain a baseline for water quality. As Aqua begins to get this baseline data, it will aide AUF in determining when and how much flushing is required to maintain water quality. As AUF gathers and develops a history of this data, flushing at current levels will reduce and only if a significant event takes place would flushing increase. There will be increased spikes in flushing as we conduct semi annual or annual flushing throughout the system. In the event customers should complain of water discoloration or have water quality issues, isolated flushing will take place. However, as Witness Luitweiler stated, flushing is not a long-term solution and Dr. Taylor has provided several long-term recommendations in his report at Exhibit No. 148 (PL-1).

Water Flushing & Break Repair Record

To be used to record water lost due to flushing or main/service line repairs

Plant CHUCUOTA

Month / Year NOV. 2008

FLUSHING:
(Include service lines, mains, hydrants, tanks, etc)

Date	H_2O Appear. Before	CL_2 Res. After	Flush Point Size	Time Flushed minutes	Hydrant Meter Readings start	/ end	Total Gallons Flushed	Location of Flush Point	Reason Flushed
11/6							10,000	HYDRO TANK	NH3 Problem
11/7							50000	Hyd@pH	Adj pH
11/8				W/ Boyd			157000	Hyd@pH	" "
11/9			flush	system			500,000	system	
11/11			"	"			350,000	"	

Flushing legend:

Flushing Program	FP	Customer Complaint	CC
Line Repair	LR	Main Clearance	MC
Contractor Use	CU	(explain others)	

MAIN / SERVICE LINE REPAIRS:

Date	Location of Repair	Size of Line	Size of Hole or Crack	Approx. Time Leaked	Estimated Water Loss	Cause of Break (if known)	Initials

(Use *AWWA Water Loss Calculation Tables*, located in the Florida Water Unaccounted for Water Guide, to estimate water losses.)

Water Flushing & Break Repair Record

To be used to record water lost due to flushing or main/service line repairs

Plant Mull.

Month / Year Nov 08

FLUSHING:
(Include service lines, mains, hydrants, tanks, etc)

Date	H_2O Appear. Before	CL_2 Res. After	Flush Point Size	Time Flushed minutes	Hydrant Meter Readings start	/ end	Total Gallons Flushed	Location of Flush Point	Reason Flushed
11/6	clear	3.8	hyd				15000	Mazurka	FP
"	"	3.5	"				8000	Camelia	"
"	"	3.5	"				5000	Asin. Hibiscus	"
"	"	3.2	"				2000	Live Oak	"
"	"	3.6	"				1500	Poinsetta	"
"	dirty	3.5	"				10,000	1st / Ave F.	"
"	clear	3.1	"				5000	1st / end	"
"	"	3.4	"				5000	Velveteen	"
"	"	3.4	"				5000	"	
11/11	clear		hyd.	60		Plant Q		Mazurka	"
"	"		"	60		meter		Center	"
"	"		"	60				Live Oak x2	"
"	"		"	"				Ik Mills Pk	"
"	"		"	"				Millstone x2	"
"	"		"	"				Poinsetta	"
"	"		"	"				Camelia	"
"	"		"	"				5th St	"
"	"		2 "	"				WWTP	"

Flushing legend:

Flushing Program	FP	Customer Complaint	CC
Line Repair	LR	Main Clearance	MC
Contractor Use	CU	(explain others)	

MAIN / SERVICE LINE REPAIRS:

Date	Location of Repair	Size of Line	Size of Hole or Crack	Approx. Time Leaked	Estimated Water Loss	Cause of Break (if known)	Initials

(Use *AWWA Water Loss Calculation Tables*, located in the Florida Water Unaccounted for Water Guide, to estimate water losses.)

Water Flushing & Break Repair Record

To be used to record water lost due to flushing or main/service line repairs

Plant Chul.

Month / Year Nov 08

FLUSHING:
(Include service lines, mains, hydrants, tanks, etc)

Date	H_2O Appear. Before	CL_2 Res. After	Flush Point Size	Time Flushed minutes	Hydrant Meter Readings start / end		Total Gallons Flushed	Location of Flush Point	Reason Flushed
11/19	clear		hyd	60		Read @ Meter		Market	"
"	"		"	"				Center	"
"	"		"	"				Live Oak	"
"	"		"	"				LK Mills PK	"
"	"		"	"				Millshore x2	"
"	"		"	"				Pinetta	"
"	"		"	60				Cornelia	"
"	"		"	"				5th St	"
"	"		2"	"				WWTP	"

Flushing legend:

Flushing Program	FP	Customer Complaint	CC
Line Repair	LR	Main Clearance	MC
Contractor Use	CU	(explain others)	

MAIN / SERVICE LINE REPAIRS:

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(Use *AWWA Water Loss Calculation Tables*, located in the Florida Water Unaccounted for Water Guide, to estimate water losses.)

Water Flushing & Break Repair Record

To be used to record water lost due to flushing or main/service line repairs

Plant Chuluota

Month / Year 11/08

FLUSHING:
(Include service lines, mains, hydrants, tanks, etc)

Date	H_2O Appear. Before	CL_2 Res. After	Flush Point Size	Time Flushed minutes	Hydrant Meter Readings start	/ end	Total Gallons Flushed	Location of Flush Point	Reason Flushed
11-11				60				SKY VIEW	FP
11-11				60				568 YELLOW TAIL	FP
11-11				60				Knot Hole	FP
11-11				60				158 Velveteen	FP
11-11				60				Osprey Lk Cir	FP
11-11				60				620 White Crane	FP
11-19				180				495 Center	FP
11-19				75				SKY VIEW	FP
11-19				120				568 Yellow Tail	FP
11-19				60				158 Velveteen	FP
11-19				300				803 Mazurka	FP
11-19				70				Knot Hole	FP
11-19				60				Osprey Lk Cir.	FP
11-19				120				620 White Crane	FP

Flushing legend:

Flushing Program	FP	Customer Complaint	CC
Line Repair	LR	Main Clearance	MC
Contractor Use	CU	(explain others)	

MAIN / SERVICE LINE REPAIRS:

Date	Location of Repair	Size of Line	Size of Hole or Crack	Approx. Time Leaked	Estimated Water Loss	Cause of Break (if known)	Initials

(Use *AWWA Water Loss Calculation Tables*, located in the Florida Water Unaccounted for Water Guide, to estimate water losses.)

Maintaining Distribution System Water Quality

A publication produced by the American Water Works Association Research Foundation (AWWARF) - *'Guidance Manual for Maintaining Distribution System Water Quality'* - serves as the industry-recognized standard, which utilities can use to optimize water quality in a distribution system. The document outlines best management practices (BMPs) in a 5-step protocol. These practices have been widely implemented at utilities throughout North America.

Step 1 Understand your distribution system and define the problems

Distribution system water quality concerns can be attributed to:

- chemical/microbiological reactions within the bulk water;
- chemical/microbiological interactions between the bulk water and piping materials;
- introduction of sediment, silt, sand, turbidity, tastes, odour, colour and organisms from the source water;
- chemical/microbiological interaction between the bulk water and silt/sediments, etc.;
- direct chemical/microbiological intrusion into the distribution system.

Step 2 Set water quality goals and establish preliminary performance objectives

To maximize distribution system water quality relative to safety and consumer satisfaction, all water utilities should have an effective water quality monitoring program in place. At a minimum, the program should:

- provide regular information about the source water quality;
- ensure that finished water entering the distribution system meets all applicable standards for disinfection and turbidity and is treated to minimize corrosion at the consumer's tap;
- monitor distribution system water quality at the frequency prescribed and look for signs of water quality deterioration;
- monitor secondary parameters, such as pH, temperature, alkalinity, turbidity and colour, throughout the distribution system to evaluate changes in water quality due to contact with distribution system materials and extended water age;
- be responsive to source water changes, treatment upsets and events in the distribution system that may impact safety, quality, or quantity.

Once a sampling plan is established, water quality goals for monitored parameters should be established. Utilities may also establish goals for the aesthetics of water at the consumer's tap in an attempt to reduce complaints and increase customer satisfaction. The utility should then establish specific performance standards to help meet the water quality goals (e.g. minimum pressure of 20 psi, minimum residual of 0.2 mg/L, maximum water age of 3 days, etc.).

Step 3 Evaluate alternatives and select the best approach

This step uses the information from Steps 1 and 2 to develop, evaluate and select the preferred approach to address water quality problems. Each of the pathways noted in Step 1 can be addressed to some degree through practices related to monitoring, operations, maintenance, engineering, and/or management. Depending on the type of water quality problem, the most appropriate solution may require changes in operations or maintenance practices, additional monitoring or an engineered solution at the source or within the distribution system.

It is important to note that distribution system operation and maintenance activities only help to maintain water quality conditions in the distribution system. As such, adequate source treatment is the first step towards improving distribution system water quality. Treated water should ideally be non-corrosive, chemically stable, non-scaling and should be free of pathogenic organisms. The water should also be stable from a microbiological standpoint to minimize the growth potential in the system. This generally means that the organic content should be low and that the water should be biologically stable.

In addition, pH instability, which results in pH fluctuations in the distribution system, causes problems because metallic piping and aging scales exposed to varying or cyclical pH conditions are more susceptible to metal release and precipitation when compared with more stable conditions. Rapid or extensive pH fluctuations may also trigger microbial changes and releases into water.

Step 4 Implement good management practices and monitor effectiveness

This step puts the recommended plan from Step 3 into action. Operating practices should be implemented to minimize the water's age, maintain positive pressure and control the direction and velocity of the water. It is important to minimize the age of the water in the distribution system because reactions within the bulk water and between the bulk water and piping materials causes water quality degradation. It is very important to maintain positive pressures throughout the system to ensure the backflow of contaminants does not occur. Various codes of good practice and manuals suggest 20 psi as a minimum pressure to maintain under extreme operating conditions such as fire flows. Utilities should also attempt to minimize rapid and/or extreme fluctuations in flow velocities and should minimize the frequency of flow reversals. These types of changes can scour sediments and bring particles into the water causing water quality deterioration.

Additional good management practices include:

- implementation of a cross connection control program - to minimize the possibility of chemical or microbiological contamination;
- implementation of a leak detection and repair program - leaks may serve as an entry point for contaminants when pressure drops in the system, in addition to contributing to excess water losses.

Maintenance procedures include system flushing and cleaning. Flushing helps to remove stagnant water and to remove unwanted contaminants that may have inadvertently entered the system. Flushing can also keep the system free of sediment if sufficient cleansing velocities are achieved. Cleaning techniques include mechanical scraping, pigging, swabbing, chemical cleaning and flow jetting. Each technique has its benefits and drawbacks and should be tailored to the specific problem. More information on flushing is provided in Appendix 'B' (Flushing Practices).

Normal utility maintenance activities also include conducting emergency pipe repairs with sanitary

precautions in place. This includes keeping contaminated water out of a trench and from entering the pipe as much as possible, flushing the line in the vicinity of the break, applying disinfectant to the components that were potentially contaminated and conducting bacteriological testing of the water to confirm the absence of contamination. Sanitary practices are also necessary in the construction and release of new watermains. Disinfection practices should follow AWWA Standards.

Utilities should also have regard for water quality during system design. Dead end pipelines should be avoided or precautions taken to minimize water age (e.g. flushing, blow-offs, etc.) Pressure zones should be planned or configured to reduce water age and maintain water quality.

Step 5 Finalize performance standards and develop standard operating procedures

This step requires the utility to develop standard operating procedures (SOPs). The preliminary performance standards proposed in Step 2 should be re-visited and changed if needed to reflect lessons learned during implementation. SOPs should be developed for each operation and maintenance function that affects system water quality, including but not limited to storage facility inspection/maintenance/operation, flushing programs, disinfection of mains, disposal of chlorinated water, etc.

The water quality goals for the distribution system and the goals for the particular function should be specifically described in the introduction of the SOP. The SOPs should include all activities needed to conduct the procedure. Standard details, tables, drawings, pictures and forms should be part of the SOP to illustrate and clarify the specific activities. The SOPs should also describe the labour, equipment and materials needed to complete the activities. Work preparation steps, actual work steps, and work completion steps should be clearly outlined and described. The activities should be periodically reviewed and modified based on input received from all affected groups to ensure SOPs remain accurate, beneficial and easy to follow.

Management should work with distribution staff to develop and implement written SOPs. This will help staff know what is expected of them, can serve as a basis for training and can help pass down knowledge from experienced staff to those who are assuming increased responsibility.

For more information contact:

Nova Scotia Environment and Labour
PO Box 697
Halifax, NS B3J 2T8
Tel: 902-424-5300
Fax: 902-424-0501
Web: www.gov.ns.ca/enla/

Flushing Practices

Effective flushing practices are identified as key for maintaining water quality and for addressing water quality concerns in most municipal distribution systems. The *Guidance Manual for Maintaining Distribution System Water Quality* as published by the AWWARF identifies a 4-step flushing program.

Step 1 Determining the Appropriateness of Flushing as Part of a Utility Maintenance Program

The guidance manual recommends that when a system experiences difficulty in maintaining a disinfectant residual in portions of the distribution system, it is recommended that a flushing program be put in place.

Step 2 Planning and Managing a Flushing Program

A site-specific program will address water quality concerns and minimize unnecessary costs. There are several types of acceptable methods including:

- *Unidirectional Flushing* – often used to remove biofilm and corrosion products by applying a minimum flushing velocity of 1.83 metres/second. Lower velocities can be used to restore chlorine residual. This method can achieve water savings of greater than 40% compared to 'conventional flushing'.
- *Conventional Flushing* – normally the method of choice as it needs little or no pre-design/engineering when compared to 'unidirectional flushing'. Also, this method requires less planning than unidirectional flushing so it can be more quickly implemented to address low chlorine residual concerns.
- *Continuous Blow-Off* – commonly implemented at systems that have numerous dead-ends and water circulation problems. Blow-offs can be installed with automation, which lessens the labour requirements compared to other flushing methods.

Step 3 Implementing a Flushing Program and Data Collection

Implementation of a flushing program may include a number of parameters to be addressed, such as:

- determining flushing velocity requirements;
- developing standard operating procedures;
- addressing public and employee safety concerns/issues;
- public notification requirements;
- data collection and management;
- reporting requirements.

Step 4 Evaluating and Revising a Flushing Program

Evaluating a flushing program allows the municipality to properly adjust their specific program. Determining whether the type of flushing and the procedures used were effective in meeting the objectives of the program will assist managers in making any necessary revisions to their program.

For more information contact: Nova Scotia Environment and Labour