

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water rates in Highlands County by HC Waterworks, Inc.	Docket No. 20190166-WU Filed: June 16, 2020
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HC WATERWORKS, INC. RESPONSE TO THE OFFICE OF PUBLIC COUNSEL PETITION PROTESTING PORTIONS OF THE PROPOSED AGENCY ACTION AND CROSS PETITION OF HC WATERWORKS, INC.

HC Waterworks, Inc. (hereinafter referred to as "HC Waterworks" or "Utility"), by and through its undersigned representative and pursuant to Sections 120.57 and 120.80(13)(b), Florida Statutes (F.S.), and Rules 25-22.029 and 28-106.201, Florida Administrative Code (F.A.C.), hereby files its response to the Office of Public Counsel (OPC) petition protesting portions of the Proposed Agency Action and motion for clarification and files its Cross-Petition. In support of its Cross-Petition, HC Waterworks, Inc. states the following:

Background

HC waterworks filed its application for rate relief with the Commission on October 15, 2019. In effort to minimize rate case expense – a cost which is ultimately borne by its customers – HC Waterworks requested the Commission process its application under the proposed agency action (“PAA”) procedures set forth in Section 367.081(8), Florida Statutes (F.S.) After reviewing the Utility’s responses to numerous staff data request, reviewing received documents from the Florida Department of Environmental Protection (FDEP), and conducting a customer meeting held in Sebring, FL, the Commission issued the PAA Order on May 22, 2020. The PAA Order granted in part the rate relief requested by HC Waterworks. Although HC Waterworks found portions of the PAA Order objectionable, it was prepared to accept the PAA Order in the spirit of compromise to avoid

protracted litigation and minimize rate case expense. However, on June 12, 2020 the OPC filed a Petition protesting portions of the PAA Order and Motion for further clarification. As explained above, HC Waterworks initially elected not to protest the PAA Order in hopes that it could minimize rate case expense and avoid protracted litigation. However, OPC's demand that disputed issues in this case be fully litigated in a formal administrative hearing takes away the opportunity for these cost savings to occur. Moreover, the relief requested by the OPC Petition, if granted, would deny HC Waterworks the compensatory rate relief to which it is entitled under the Florida and United States Constitutions and Chapter 367, Florida Statutes as it would require additional O&M expense related to monitoring and reporting costs not included in the current approved PAA rates.

At the PSC Agenda Conference held on May 5, 2020, the OPC representative began her presentation with the incorrect statement that "In short, the ongoing service issues are brown and black fowl smelling water, water which is painful for customers to shower in, and which appear to put them in health risk in that it causes painful skin reactions and kills or sickens pets." (Agenda TR 8 – Document **02591-2020** – emphasis added) This is a serious allegation towards the Utility, not backed up by any verified evidence presented.

At the Agenda, Commissioners Brown and Polmann stated their concern with better communication with customers and a perceived lack of trust of the Utility. (TR 36)

Subsequently during the protest period, OPC filed a letter to Chairman Gary Clark dated May 29, 2020, beginning: "Pursuant to our telephone conversation after the last agenda." OPC continued by stating in its letter, "I am writing to summarize the issues we discussed related to the above referenced docket." HC Waterworks was unaware of this conversation and is concerned that this infringes towards "ex parte" communication since

OPC has now filed a petition of the PAA Order on June 12, 2020 after this “conversation” with the Chairman.

Evidenced by this subsequent communication with the Commission, HC Waterworks believes it is now disingenuous for the OPC now to disavow itself of its responsibility in this communication process with the customers it represents. HC Waterworks was and is fully prepared to work with the OPC in a betterment of its communication process with its customers.

In its PAA decision, the Commission found the quality of service unsatisfactory and imposed a penalty of fifty basis points to the allowed return on equity. The Florida Supreme Court has cautioned that the FPSC’s authority to reduce earnings is a “powerful tool” to bring about improved utility services, but it should be used “carefully” so as to avoid depressing earnings to a level that would jeopardize the utility’s ability to continue service improvement programs. See *Askew v. Bevis*, 283 So. 2d 337, 340 (Fla. 1973). In keeping with this warning, the FPSC has been careful to limit ROE penalties to egregious situations such as where the utility has flagrantly disregarded environmental regulations, ignored FPSC rules. See, e.g., Order No. PSC-03-0699-PAA-SU and Order No. PSC-98-0763-FOF-SU. There is no evidence in this case, and indeed no claim, that HC Waterworks has flagrantly disregarded FDEP’s or the FPSC’s rules, charged unauthorized rates, or ignored staff’s requests for information.

The Supreme Court decision in *Gulf Power Co. v. Wilson*, 577 So.2d 270 (Fla. 1992) is particularly instructive in addressing whether the FPSC should impose an ROE. In that case, the utility’s management admitted that a senior executive had for years been engaged in corrupt practices such as theft, misuse of utility property and inappropriate political

contributions. Because of those extraordinary circumstances, the FPSC reduced Gulf Power's rate of return by 50 basis points, but limited that ROE reduction for a period of two years on the basis that utility management had shown a commitment to address its prior problems. None of those extraordinary circumstances are present in this case. The punitive ROE penalty approved by the Commission ignores HC Waterworks' good faith efforts to provide and improve its quality of service to customers.

The water quality issues have existed for numerous years in the water system. Previously, in Order No. PSC-10-0297-PAA-WS issued May 10, 2010, the FPSC approved a Phase II Monitoring Plan agreed to by the OPC and Aqua Utilities Florida (AUF). The Lake Josephine and Leisure Lakes systems were included in the monitoring plan. As indicated in Document No. 07777 filed September 16, 2010 in Docket No. 20080121-WS (Attached), meetings were held in both Leisure Lakes and in the Lake Josephine area. This document indicated that "The Company made several attempts to contact customers to represent the Lake Josephine system but those customers declined to participate.." Again, OPC participated in this process.

The Parties

1. The name and address of the agency affected and the agency's docket number are:

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Docket No. 20190166-WU

2. The name and mailing address of the Applicant that initiated this docket are:

HC Waterworks, Inc.
4939 Cross Bayou Blvd.
New Port Richey, Florida 34652
(727) 848-8292 (Telephone)
(727) 848-7701 (Facsimile)

3. The names and addresses of the Utility's authorized representative is

Troy Rendell
Vice President
Investor Owned Utilities
U.S. Water Services Corporation
4939 Cross Bayou Blvd.
New Port Richey, Florida 34652
(727) 848-8292 (Telephone)
(727) 848-7701 (Facsimile)

4. HC Waterworks received obtained a copy of the PAA Order via email on or about May 22, 2020. HC Waterworks received a copy of OPC Petition via email on June 12, 2020.

5. HC Waterworks provides water and wastewater utility service in Highlands County which is subject to the Commission's jurisdiction. HC Waterworks water and wastewater rates are regulated by the Commission. The PAA Order establishes the rates and charges that HC Waterworks can charge for water service it provides to the public. Therefore, the PAA Order affects directly the substantial interests of HC Waterworks.

6. HC Waterworks is not opposed if the Commission wishes to add further clarification to its PAA Order on what further actions it desires, however, OPCs petition is vague and unclear as to how further "testimony" and "discovery" would bring further clarification to its request. Indeed, further discovery and testimony will result in additional rate case expense in which HC Waterworks would be entitled to recover from its customers. Again, HC Waterworks has been willing and looks forward to working with

the OPC and its customers to provide improved communication of the significant improvements made to the water system and quality of water. HC Waterworks contends the Commission always carries with it the statutory authority to enforce its Orders and impose penalties in failing to comply. (Section 367.121 and 367.161, F.S.)

7. HC Waterworks contends that the OPC's "Statement of the Ultimate Facts Alleged" do on the contrary not state any alleged facts for the Commission to proceed to an administrative hearing. As such, HC Waterworks maintains that the PAA Petition fails to raise a genuine issue as to any material fact, and therefore the Petitioner is not entitled to a formal administrative hearing under Section 120.57(1), Florida Statutes. Instead, the PAA Petition merely requests further clarification as to possible future requirements. Moreover, the PAA Petition does not allege that the Commission's decision reflects a mistake of law.

Disputed Issues of Material Fact and Law

8. This Cross-Petition is filed for the purpose of reserving HC Waterworks request for further rate case expense or monitoring costs in the event of an administrative hearing. As such, HC Waterworks is seeking Commission action on the following disputed issues of material fact and law:

a) Whether the amount of O&M expenses properly reflect any additional monitoring, customer meeting costs (including travel), monitoring and reporting costs necessary to provide OPCs requested accountability.

b) Whether the amount of rate case expense reflected in the PAA Order is accurate and properly reflects the full rate case expense that has been and will be incurred through the conclusion of the formal administrative hearing.

Ultimate Facts Alleged

9. HC Waterworks has supplied the Commission with adequate documentation that demonstrates that the Utility has made significant capital investment to address the water quality which has existed over several years. This investment was required by the Florida Department of Environmental Protection (FDEP) in order to address customer complaints. This evidence specifically shows that HC Waterworks meets or exceeds both primary and secondary water quality standards set by the FDEP and is currently in compliance. The PAA Order specifically states, “We find that HC’s water system infrastructure and operating conditions are currently in compliance with DEP.”

10. The Commission further found that: “While the Utility is in compliance with DEP and customer complaints have declined overall since 2016, there are still many customer complaints on the pressure, color, and smell of the water provided by HC.”

11. The Commission finally stated that: In an effort to reduce the number of overall complaints for this Utility, we also require that HC engage with its customers and the Office of Public Counsel (OPC) to address the Utility’s customer service issues. *This shall be an ongoing effort by HC* to work with its customers and OPC to resolve the Utility’s service quality issues and communication problems.” (emphasis added)

12. The Commission has previously Ordered a similar cooperation with the OPC in one of the sister utilities, The Woods Utility Company. See Order No. PSC-2020-0087-PAA-WS, issued March 25, 2020 where it stated: “Additionally, the

Utility shall engage with its customers and with the Office of Public Counsel on its efforts to ameliorate the quality of its product.” The OPC subsequently did not file a Petition protesting that decision in that docket.

Reservation of Rights

13. HC Waterworks reserves the right to amend this Cross-Petition based upon information obtained from discovery or other means.

Request for Relief

WHEREFORE, HC Waterworks as Cross-Petitioner respectfully request the Commission dismiss OPCs Petition Protesting the PAA Order. In the event a formal administrative hearing is scheduled, HC Waterworks request the Commission issue a final order approving the rate relief requested by HC Waterworks in the hearing.

Respectfully submitted this 16th day of June, 2020.



Troy Rendell
Vice President
Investor Owned Utilities
// for HC Waterworks, Inc.
4939 Cross Bayou Blvd.
New Port Richey, Florida 34652
(727) 848-8292 (Telephone)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Application has been furnished via U.S. Mail to the following this 16th day of June 2020:

Kurt Schrader
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

J.R. Kelly
Office of Public Counsel
c/o The Florida Legislature
111 W Madison St, Room 812
Tallahassee, FL 32399-1400



Troy Rendell
Vice President
Investor Owned Utilities

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: September 16, 2010
TO: Ann Cole, Commission Clerk, Office of Commission Clerk
FROM: Marshall W. Willis, Director, Division of Economic Regulation 
RE: Docket No. 080121-WS - Aqua Utilities Company

Please add the attached correspondence from Jack Lihvarcik dated September 15, 2010 to the above docket. Thank you.

MW:kb

DOCUMENT NUMBER-DATE

07777 SEP 16 2

FPSC-COMMISSION CLERK



Memorandum

Date: September 15, 2010

To: Florida Public Service Commission Staff

Cc:

From: Jack Lihvarcik

Re: **Summary of Customer Meetings – Secondary Water Quality**

In accordance with the additional 6 month Customer Service Monitoring discussed in Order No. PSC-10-0297(the " Order"), Aqua agreed to conduct two series of meetings with customers of the 7 systems identified for Secondary Water Quality improvements: Lake Josephine/Sebring Lakes, Leisure Lakes, Rosalie Oaks, Zephyr Shores, Tangerine, and Tomoka View. With respect to the first series of meetings, the Order required Aqua to meet with between 2 to 3 customers from each system and the OPC to discuss water quality, and service issues, and to present distribution system improvements to address water quality and reliability. With respect to the second series of meetings, Aqua was required to meet again with 2 to 3 customers from each system to address the costs and impact on rates. The first series of e meetings took place were scheduled from July 7, 2010 to July 9, 2010 for Lake Josephine/Sebring Lakes, Leisure Lakes, Rosalie Oaks, Zephyr Shores, Tangerine, and Tomoka View. In Aattendingance from Aqua were Jack Lihvarcik, Troy Rendell, Tricia Williams;, representing the Office of Public Council were Charles Beck and Earl Poucher.

The commission order required between 2 to 3 customers from each system to meet with the Company and OPC and discuss water quality, service issues, and the Company was to present distribution system improvements to address water quality and reliability. The second meeting is to address the costs and impact or rates.

Below is a summary of the first series of meetings with the 7 systems (there are actually 6 since Lake Josephine and Sebring Lakes are now one system):

1. Lake Josephine/Sebring Lakes:

Mr. Carr attended representing Sebring Lakes. Mr. Denardis could not attend due to medical conditions. Aqua The Company made several attempts to contact customers to represent the Lake Josephine system but those customers declined to participate. was not successful in having a customer represent Lake Josephine.

DOCUMENT NUMBER DATE

07777 SEP 16 2010

FPSC-COMMISSION CLERK

Several attempts were made contacting customers but these customers did not want to participate.

Customer's Statements:

- The customer represented that over the last 12 to 18 months, the service and water quality has improved. This has been since the last rate case public hearing.
- The sulfur smell is better in the system. The installation of the blow-off at the end of his street with a timer has improved water quality. Mr. Carr indicated that he had experienced a problem when there was an incident when the timer failed. and immediately Mr. Carr experienced water quality issues.
- There are water complaints on Caravele Street, Some of the customers asked if the water main can be looped in the Caravele Street area. AquaThe company will be looking into the cost to loop the system or other actionsremedies to improve water quality.
- A question was raised as to whether the installation of if the AdEdge system would impact rates.be installed what would it do to rates? This will be discussed at the next meeting.
- Mr. Beck asked "what is the current sulfide situation". Mr. Carr responded he and his wife have not smelled any sulfur.
- Some customers stated that they Still hashad some residue on plumbing fixtures (sink and tub).

2. Leisure Lakes:

Mr. Loomis (HOA Vice President) and Beryll Hansen (Board Member) represented Leisure Lakes.

Customer's Statements:

- Mr. Loomis indicated that he liked his water.
- Mr. Hansen indicated that the water does not taste bad; however he has experienced a black ring in the toilet.
- The water quality in March was perfect. They have seen the quality change in April and May. It was explained that when the residents leaveing their homes for an extended period, to return home, water stagnates in the lines which presents challenges to maintain water quality. water usage is reduced and water quality is more difficult to maintain.
- CustomersThey commented the sewer plant is working great. Mr. Loomis walks every morning and does not smell any odors from the plant.
- When a customers use the Aqua on-line complaint - the response has improved.
- The HOA indicated that conducted an internal survey and the majority of water quality concerns related to response was issues with taste & odor. The residents could not figure out why one block has no water quality issues and another has water quality issues.
- The HOA, as a consensus, would not mind paying more for water if water quality improves because they would not and will eliminate them haveing to purchase filters or bottled water.

- The HOA They indicated they would like Aqua to proceed with improvements.

3. Rosalie Oaks

Ms. Schmidt and Mr. Bessett represented Rosalie Oaks.

Customer's Statements:

- Ms. Schmidt does not have any issues or problems with water quality or service. She drinks the water, tells everyone to drink the water. The water is clear and the customer uses it for preparing food, coffee etc.
- Mr. Bessett has issues with an orange/pink or black ring in his toilet, and chlorine smell that at times is present in the water. The customer stated however that the chlorine smell is not there all the time.
- Mr. Bessett has water quality issues and checks with his neighbors across the street or next to him and they do not have issues with the water.
- Mr. Bessett mentioned his neighbor does not drink the water or allows his dog drink the water. After the meeting Troy, Tricia and myself personally met with Mr. Bessett's neighbor to discuss his water quality issues. The neighbor could not quantify or give specific issues with the water only he would not drink it nor give to his dog. I asked if the water had a chlorine smell, rotten egg smell or discoloration and his answer was no, he just doesn't drink the water.
- Both customers stated there are no rotten egg or sulfur issues with the water.

4. Zephyr Shores

There were approximately 55 customers who attended. Approximately 16 customers gave comments.

Customer's Statements:

- Discussed the installation of the sequestering system to improve the water quality, iron and hardness of the water.
- The new sequestering system worked in March when it was first installed. Customers stated that The water quality appeared to have degraded in April when the residents moved back home.
- One customer stated that Denny:he did have good water in May and June but d. Does see a residue in his denture case
- The majority of the complaints were based around rates. Customers stated that They would not have a problem paying the rates if the water quality is good.
- The attendees discussed the installation of additional flushing hydrants and looping dead end lines and interconnecting water mains. The cost of these improvements will be addressed at the next meeting.
- American Condo representatives stated that : They do not have any odor issues, but notice "white ring build up" after they finish . When the washing their cars. white rings build up when the water dries.
- Some customers stated there is some rust in the water but not all the time.

- Some customers stated that they do not drink the water because it does not taste good.
- Aqua representatives went to a customer's home to examine the water from his faucet and to discuss the meeting. The water from the kitchen tap looked clear and tasted good. All representatives of Aqua tasted the water and discussed with the customer.
- Customers discussed the possibility of interconnecting with the county or city. The differences in disinfection methodologies were discussed.

5. Tangerine

Representing Tangerine:; Grace Culler, Mary Pezzo and Tony Vanderburg

Customer's Statements:

- Mr. Vanderburg mentioned that he does smell some chlorine in the morning but . Does not have rust in his water.
- Customers residing on Oak Street indicated that they do experience does have some smell and taste issues with in the water.
- They suggested Aqua send letters to the customers when any major construction projects are taking place in their community.
- Discussed the distribution system improvement project, looping of dead end water lines, elimination of cast iron, and galvanized water mains to improve water quality.
- Aqua representatives noted that Tthe distribution system project was on-going at the time of the meeting.
- Discussed the installation of the sequestering system to improve the water quality, iron and hardness of the water.
- Overall the customers were satisfied with the water quality and service.

6. Tomoka View

Representing Tomoka View: Harley Hoffman, Alan Gilbert, and Rock Hartley.

Customer's Statements:

- Discussed the distribution system improvements, the replacement of cast iron mains, installation of critical valves and flushing hydrants to improve water quality.
- The installation of the chloramination system to reduce the Tthm violation. Rock Hartley commented on bringing the system back into compliance and had the test results from the Volusia County Health Dept. which confirmed compliance.
- Aqua representatives Iinformed the customers m of the future capital improvements involving the by lining the storage tank. This will eliminate the tank from leaking.
- Mr. Hartley wanted to discusspursue the customer billing complaints that were submitted to Mr. Devlin at the PSC. Information on these customers' bills were previously sent to the PSC for review during the last rate case.
- Mr. Hoffman commented the water quality from February to July was excellent. He did have an issue recently and it was explained with a

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chloramination system you periodically had to chlorinate burn out the system to return it bring it back into balance.

- Mr. Hoffman suggested the installation of posts around the flushing hydrant at the entrance to the shopping center to protect it from being hit.
 - Mr. Hoffman very little complaints or water quality issues. In the June news letter Mr. Hoffman informed everyone of the meeting to let him know of any issues. He had no complaints. In July he had 2 complaints.
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Leisure Lakes Tuesday, Sept. 21, 2010 10:00 a.m. ■■■

Clubhouse 101 Parkview Cir S, Lake Placid, FL 33852

Joan Terrell Board Prez, 172 Woodside Drive, Lake Placid, FL 33852 412.999.7197 or 863.699.0430

Richard Loomis VP of Board, 2 Pine Tree Ct, Lake Placid, FL 33852 863-699-6625

Bill Allis, 56 Venetian Way, Lake Placid, FL 33852

Lake Josephine / Sebring Lakes Tuesday, Sept. 21, 2010 1:00 p.m. ■■■

Holiday Inn (Meeting Room) 601 South Lakeview Road, Lake Placid, FL 33852 863-465-9916

Mr. Mark Denardis, 5402 Sebring Lakes Blvd, Sebring, FL 33875 863-655-0220 Sebring Lakes

Roy & Pat Carr, 4349 Sebring Lakes Blvd, Sebring, FL 33871 863-655-0352 Sebring Lakes

Rosalie Oaks Wednesday, Sept. 22, 2010 9:00 a.m. ■■■

Perkins, 503 Hamlin Street, Lake Wales, FL 33853 863-676-0991

Helen Schmidt, 46 Rosalie Oaks Blvd, Lake Wales, FL 33898 863-696-3831

Ken Bessette, 11 Rosalie Oaks Blvd, Lake Wales, FL 33898 863-696-1495 or 813-417-1693

Zephyr Shores Wednesday, Sept. 22, 2010 3:00 p.m. ■■■

Club House 35112 Ada Ave, Zephyrhills, FL 33541

Gus Alexakos, 4625 Windy Lane, Zephyrhills, FL 33541 813-780-2810

Bob Ellis, 4600 Clarice Ave, Zephyrhills, FL 33541 813-779-9996

Tangerine Thursday, Sept. 23, 2010 9:30 a.m. ■■■

Tangerine Community Center, 7101 Wright Ave., Tangerine, FL 32777

Grace Culler 5700 Huron St, Tangerine, FL 32777 352-383-8219 Mailing: PO Box 553

Mary Pezzo 7177 Scott Ave, Tangerine, FL 32777 352-383-9629 Mailing: PO Box 397

Tony Vanderburg 7072 Earlwood Ave, Mount Dora, FL 32757 352-383-2410 Mailing: PO Box 314

Tomoka View Thursday, Sept. 23, 2010 2:00 p.m. ■■■

Hampton Inn 155 Interchange Blvd., Ormond Bch, FL 32714 (Sm Meeting Room) 386-677-9999

Harley Hoffman, 108 Seminole Drive, Ormond Beach, FL 32174 386-677-6306 or 386-295-7873

Richard Hartley (Rock), 307 Water Oak Ln, Ormond Beach, FL 32174 386-672-4423

Alan Gilbert, 109 Seminole Drive, Ormond Beach, FL 32174 386-672-5078

		Zephyr Shores	Rosalie Oaks	Lake Josephine	Sebring Lakes	Leisure Lakes	Tomoka View	Tangerine
System Stats	Number of Customers	468	89	538	75	273	263	269
	Current Type Of Treatment	Chlorination	Chlorination	Aeration & Chlorination	Aeration & Chlorination	Aeration & Chlorination	Aeration & Chlorination	Chlorination
	Capacity (GPD)	200,000	100,000	300,000	280,000	72,000	193,000	360,000
	Age of System	~1975	~ 1977	2008 WTP - Distribution ~ 30yr old	~ 1981	Built 1974	Built 1965	Built 1945
	Aqua Supervisor	Gene DeMayo	Gene DeMayo	Gene DeMayo	Gene DeMayo	Gene DeMayo	Paul Thompson	Will Fontaine
	Aqua System Facility Operator	Steve Fuller	Steve Fuller	Eddie Christmas	Eddie Christmas	Eddie Christmas	David Haring	Terry McCarthy
Water Quality Complaints	# of Complaints 6/1/09-3/22/10	30	2	6	1	9	20	16
	Water Quality Issues	Sulfur		X	X	X	X	X
		Manganese	X	X				
		Calcification	X	X	X	X	X	X
		Iron	X					X
Particles	X	X	X	X	X	X	X	
Plan of Action	Type Of Treatment Identified	Unidirectional Flushing Program; Sequestering with Aqua Mag	None, adjust flushing to coincide w/ vacancies	AdEdge, merge with Sebring Lakes	AdEdge Pilot, merge with Lake Josephine	Unidirectional Flushing Program; AdEdge	Unidirectional Flushing Program; Chloramination	Sequestering with Aqua Mag, Install chlorine analyser & autodialer, looping deadend mains
	Unidirectional Flushing Upgrades Needed	Install Isolation Valves & Blow Offs	Extend water line and install additional Blow Offs	None identified prior to merge with Sebring Lakes	None identified prior to merge with Lake Josephine	No additional installation work identified	Install Isolation Valves & Blow Offs	Install Isolation Valves & Blow Offs
	DEP permitting necessary	Yes, for sequestration	No	Yes, to merge systems & installation of AdEdge	Yes, to merge systems & installation of AdEdge	Yes, for AdEdge	Yes, for chloramination	Yes, for sequestration
	WMD permitting necessary	N/A	N/A	Yes	Yes	N/A	N/A	N/A
	Distribution System Improvements	\$ 500	\$ 6,600	\$ 6,139.00		\$ 14,788.00	\$ 39,382.00	
	Cost of additional treatment	\$10,000		\$150,000	\$150,000	\$ 150,000	\$ 13,610	\$ 9,500
	Cost of additional line looping							\$ 90,000
Expected Results of Solution	Remove iron & sediments from distribution system, give water "soft" appearance	Provide fresher water to customers prior to return to system	Improve pressure problems, remove hydrogen sulfide	Improve pressure problems, remove hydrogen sulfide	Remove sediment and scour distribution system, remove hydrogen sulfide	Remove sediment and scour distribution system, Chloramination to control TTHMs	Improve pressure problems, give water "soft" appearance, remove sediment from distribution system	