

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

NOTICE OF STAFF WORKSHOP

TO

WATER AND WASTEWATER UTILITIES

AND

ALL INTERESTED PERSONS

RE: UNDOCKETED

USED AND USEFUL RULEMAKING WORKSHOP

ISSUED: June 12, 1995

NOTICE is hereby given that the Staff of the Florida Public Service Commission will conduct a workshop, in the above-referenced matter, to which all persons are invited, at the following time and place:

9:30 a.m., Wednesday and Thursday, July 12 - 13, 1995  
Room 152, Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399

PURPOSE

The purpose of this workshop is to discuss and evaluate staff's proposed rules regarding the determination of plant used and useful in rate proceedings. A copy of staff's proposed rules is attached to this Notice. Workshop participants should review the rules and be prepared to comment on them.

Parties who wish to comment but cannot attend the workshop are encouraged to file comments with the Division of Records and Reporting, 2500 Shumard Oak Blvd., Tallahassee, Florida 32399-0850, on or before July 5, 1995, specifically referencing "Undocketed Water and Wastewater Used and Useful Workshop."

Those rules pertaining to both water and wastewater systems, such as margin reserve, will be discussed first on July 12th. The workshop will then focus on issues applicable to wastewater systems. The final topic will be the rules pertaining to water systems only.

Any person requiring accommodation at this workshop due to a physical impairment should call the Division of Records and Reporting at (904) 413-6770 at least five calendar days prior to the workshop. Persons who are hearing or speech impaired should contact the Florida Public Service Commission using the Florida Relay Service, which can be reached at (800) 955-8771 (TDD).

DOCUMENT NUMBER-DATE

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### General Information

Pursuant to Section 367.081(2)(a), Florida Statutes, the Commission is required to consider plant "used and useful" in the public service. The Commission practice is to consider used and useful in each rate proceeding. In an effort to codify prior practice, and to introduce new procedures, the proposed rules are offered. A utility's investment in transmission and distribution and collection lines is not addressed by the default used and useful formulas; however, it is addressed with respect to margin reserve. Due to the potential complexity of codifying formulas for lines, this subject is not being addressed at the workshop.

Parties who wish to submit materials for the Commission's and participants' review and discussion should submit them to Mr. John Williams, Division of Water and Wastewater, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850, by July 3, 1995, so that copies may be made.

### Issues

#### Both Water and Wastewater Systems

1. Are the proposed definitions adequate?
2. Are the proposed margin reserve calculations proper and sufficient?
3. Have cost/benefit analyses been addressed adequately?

#### Wastewater Systems Only

4. Are infiltration and inflow addressed sufficiently?
5. Are the used and useful default formulas for wastewater systems adequate?

#### Water Systems Only

6. Is the proposed rulemaking regarding fire flow appropriate and adequate?
7. Has unaccounted for water been addressed sufficiently?
8. Are the used and useful default formulas for water systems adequate?
9. What is the appropriate methodology for determining instantaneous demand?

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JURISDICTION

Jurisdiction is vested in this Commission pursuant to Chapter 367, Florida Statutes. The workshop will be governed by the provisions of that Chapter and Chapters 25-22 and 25-30, Florida Administrative Code.

By DIRECTION of the Florida Public Service Commission, this  
12th day of June, 1975.

Blanca S. Bayó

BLANCA S. BAYÓ, Director  
Division of Records and Reporting

( S E A L )

SKE/KJ.

1        25-30.432 Used and Useful in Rate Case Proceedings.

2            (1) Definitions - the following definitions apply to Rule 25-  
3        30.432, F.A.C., for determining used and useful water and wastewater  
4        facilities.

5            (a) Economies of scale - The decrease in unit cost of water or  
6        wastewater plant that typically occurs with an increase in system  
7        capacity. Economies of scale can be defined either in the context of  
8        total system capacity or changes in a single component of the system.

9            (b) Effluent Disposal Facilities - this includes, but is not  
10       limited to, the transmission lines, percolation and evaporation ponds,  
11       sprayfields, irrigation systems, effluent pumping equipment, and deep  
12       wells utilized in the disposal of effluent or reclaimed water, as required  
13       to meet applicable federal, state and local requirements.

14           (c) Emergency Storage - that storage required by a water system to  
15       meet the emergency-like demands of the customers. Typically, Emergency  
16       Storage is made available when it is more cost effective to provide the  
17       storage and pumping facilities than to add redundancy to the system for  
18       emergency conditions. The quantity of Emergency Storage need is a  
19       function of the duration of the emergency condition and is assumed to be  
20       approximately one half of the maximum day demand.

21           (d) Equalization Volume - the quantity of storage in a water  
22       system necessary to meet the customers' greatest demands which are beyond  
23       the throughput capacity of the source of supply or water treatment

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1 equipment. The Equalization Volume is assumed to be approximately one-  
2 quarter of the maximum daily demand.

3 (e) Equivalent Residential Connection (ERC) - 350 gpd per ERC for  
4 water and 280 gpd per ERC for wastewater. -

5 (f) Fire Flow Requirement - as defined in 25-30.432(5)(b), F.A.C.

6 (g) Firm Reliable Capacity - the capacity of a particular  
7 component of a water facility in which at least the largest unit is  
8 assumed to be out of service. If the used and useful category contains  
9 several components, the Firm Reliable Capacity is assumed to be the  
10 limiting component in that category with the largest unit out of service.  
11 If there is only one component, then that component's capacity becomes the  
12 Firm Reliable Capacity. For finished water storage, the Firm Reliable  
13 Capacity excludes any unusable or dead storage (10% of ground storage  
14 capacity).

15 (h) Infiltration - refers to those extraneous flows (usually from  
16 groundwater sources) that enter the wastewater system through openings in  
17 pipes that may be caused by normal deterioration, corrosion, or damage  
18 from ground movement or structural overload.

19 (i) Inflow - refers to extraneous flows from sources other than  
20 infiltration, such as surface water run-off into manholes or from  
21 unauthorized connections to surface water sources.

22 (j) Instantaneous Demand - the greatest demand that a water system  
23 attains. It is typically used only as a design criteria for small water

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1 systems with no storage and a small distribution system that does not have  
2 the ability to absorb these instantaneous demands through depressurization  
3 of the distributions system. The charts in Rule 25-30.432(7), F.A.C.,  
4 shall be used to determine the instantaneous demand unless specific  
5 quantitative information indicates greater demands.

6 (k) Large Water System - a system that has a firm reliable  
7 capacity of 1 million gallons per day or greater. Staffing shall be as  
8 mandated in Rule 62-699, F.A.C.

9 (l) Margin Reserve - as defined in 25-30.432(5)(a), F.A.C.

10 (m) Maximum Day Demand - the maximum daily demand that a water  
11 system attained during the past 5 years of time, exclusive of emergency or  
12 fire flow events.

13 (n) Other Wastewater Facilities - this includes, but is not  
14 limited to, disinfection units, emergency generators, auxiliary engines,  
15 customer service laterals, laboratory equipment, utility office and other  
16 general plant and equipment used in the operation of a wastewater system.  
17 Specifically excluded from this definition are a wastewater system's  
18 pumping stations and collection mains (both gravity and force).

19 (o) Other Water Facilities - this includes, but is not limited to,  
20 hydropneumatic tanks, disinfection facilities, emergency generators,  
21 auxiliary engines, customer service lines and meters, laboratory  
22 equipment, utility office and other general plant used in the operation of  
23 a water system. Specifically excluded from this definition are a water

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1 system's transmission and distribution lines.

2 (p) Peak Hour Demand - the greatest demand attained by a water  
3 system over a sustained period of 60 minutes. Typical design criteria for  
4 a Peak Hour Demand of 2 times the maximum day demand or 1.1 gpm per ERC  
5 can be used if historical flow data is not available.

6 (q) Small Water System - a system that has a firm reliable  
7 capacity of less than 1 million gallons per day. Staffing shall be as  
8 mandated in Rule 62-699, F.A.C.

9 (r) Unaccounted for water - all water produced or purchased by a  
10 water utility that is neither sold, metered nor accounted for in the  
11 records of the utility. Water, other than that sold, that shall be  
12 accounted for includes, but is not limited to, water for plant operations,  
13 line flushing, hydrant testing, hydrant use, sewer cleaning, and street  
14 cleaning.

15 (s) Wastewater Customer Demand - the wastewater flows which match  
16 the utility's specified time frame in its Department of Environmental  
17 Protection (DEP) permit -- annual average daily flow, the three month  
18 average daily flow, or the maximum month average daily flow.

19 (t) Wastewater Permitted Capacity - the established design  
20 capacity of a wastewater facility in its DEP permit and the specified time  
21 frame (annual average daily flow, maximum monthly average daily flow,  
22 three-month average daily flow).

23 (u) Wastewater Treatment Equipment - this includes, but is not

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1 limited to, the influent structure, pretreatment facilities, pumps,  
2 aerators, clarification tanks, filters, digestors, and chlorine contact  
3 equipment.

4 (2) The utility's investment, prudently incurred, in meeting its  
5 statutory obligations to provide safe, efficient and sufficient service,  
6 shall be considered used and useful.

7 (3) Utilities are encouraged to undertake planning that recognizes  
8 conservation, environmental protection, economies of scale, and which is  
9 economically beneficial to its customers over the long term.

10 (4) In determining those portions of water and wastewater systems  
11 that are used and useful in serving the public, the Commission shall  
12 consider:

13 (a) the design and construction requirements set forth in Chapters  
14 62-532, 62-555, 62-600, 62-601, 62-604, 62-620 and 62-640, F.A.C.

15 (b) the investment in land acquired or facilities constructed or  
16 to be constructed in the public interest within a reasonable time in the  
17 future:

18 (c) the prudence of the investment, taking into consideration such  
19 factors as the treatment process, water storage capacity, economies of  
20 scale, the historical and projected rate of growth in customers and  
21 demand, regulatory requirements, including those requiring plant  
22 redundancies, seasonal demand characteristics, residential and commercial  
23 mix, and the configuration of the service area.

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1           (5) For the purpose of calculating used and useful, the following  
2 specific factors shall apply. When applying these factors, references to  
3 demand shall mean the demand per connection (in ERCs) used for design or  
4 permitting, or the actual historical demand per connection if such data  
5 has been shown by the utility to be accurate and reliable.

6           (a) Margin Reserve

7           1. The Commission recognizes that for a utility to meet its  
8 statutory responsibility, it must have sufficient capacity and investment  
9 to meet the existing and changing demands of present customers and the  
10 demands of potential customers within a reasonable time. The investment  
11 needed to meet the demands of potential customers and the changing demands  
12 of existing customers is defined as margin reserve. Margin reserve is  
13 recognized as a component of used and useful rate base. The Commission  
14 shall include an allowance for margin reserve if requested by the utility.

15           2. In determining the allowable investment in margin reserve, the  
16 Commission shall consider, but not be limited to, the functions of each  
17 component of plant, regulatory lag, the rate of growth in customers and  
18 demand, and the time needed to construct plant (the "construction  
19 factor").

20           3. As a part of its rate filing, the utility shall submit  
21 historical, reliable data for a minimum of four years, if available,  
22 preceding the test year and including the test year for the year-end  
23 number of customers by class and meter size; the annual sales by class;

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1 the annual treated or pumped flows for the system; and system peak day  
2 flows for each year. The utility's most recent wastewater capacity  
3 analysis report, if any, filed with DEP shall also be submitted as part of  
4 the rate filing.

5 4. Unless otherwise justified, margin reserve shall be calculated  
6 by applying linear regression to the utility's five year's historical  
7 growth data (in ERCs) so that a projected growth can be determined and  
8 then multiplying that growth by the appropriate construction factor.

9 a. Water source and treatment facilities and wastewater treatment  
10 and disposal facilities: the calculated growth (in ERCs) multiplied by the  
11 following construction factors:

12 (i) water source, treatment facilities, and each water system  
13 component have a construction factor of 3 years:

14 (ii) wastewater treatment and disposal facilities have a  
15 construction factor of 3 years:

16 b. Margin reserve for transmission and distribution lines and  
17 pumping stations and collection mains shall be the calculated growth  
18 multiplied by a construction factor of 1 year.

19 (b) Fire Flow

20 1. Fire flow shall be considered in used and useful default  
21 formulas for storage and high service pumping for any utility that  
22 requests that fire flow be a consideration in its system requirements. If  
23 the Commission determines that a utility can provide fire flow in a more

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1 economical manner than through storage and high service pumping, it may  
2 allow fire flow to be considered in used and useful calculations for  
3 components other than storage and high service pumping. However, any  
4 utility that receives an allowance for fire flow in used and useful  
5 calculations shall maintain the ability to provide adequate, reliable fire  
6 flow at all times in the future, unless it meets the requirements in 25-  
7 30.432(5)(b)2 for adding fire flow capacity. For a utility meeting the  
8 requirements in 25-30.432(5)(b)2 for adding fire flow capacity, once the  
9 ability to provide adequate, reliable fire flow has been achieved, such  
10 ability shall be maintained from that point on. If a utility has  
11 previously received fire flow consideration in used and useful  
12 calculations but fails to maintain adequate, reliable capacity for fire  
13 fighting (e.g. sells fire flow capacity), then the Commission may reduce  
14 the utility's rate of return by up to 50 basis points until adequate fire  
15 protection is once again maintained.

16 2. An allowance for fire flow shall be included in used and  
17 useful calculations up to the capacity of the appropriate component. If  
18 a utility cannot provide adequate, reliable fire flow and is requesting an  
19 allowance for fire flow in used and useful calculations, the Commission  
20 shall require the utility to take the steps necessary to provide such fire  
21 flow capacity. In doing so, the Commission shall set a reasonable  
22 timetable for compliance and may later reduce rates for that portion  
23 associated with allowed fire flow capacity if such requirements are not

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1 met within the specified timetable.

2       3. When fire flow requirements are set by a governmental  
3 authority, those requirements shall be the basis for determining the fire  
4 flow component of used and useful. In such cases, as part of its rate  
5 filing, the utility shall identify and file with the Commission a copy of  
6 the applicable governmental fire flow requirements. In all other cases,  
7 unless specific support is provided, the Commission shall consider a  
8 minimum fire flow demand to be 500 gallons per minute (gpm) for single  
9 family and 1,500 gpm for multiple family and commercial areas for a  
10 duration of 2 hours for needed fire flows up to 2500 gpm, and 3 hours for  
11 needed fire flows of 3000 and 3500 gpm. Such requirements shall be  
12 satisfied without causing deterioration of water pressure below 20 pounds  
13 per square inch (psi).

14       4. Inasmuch as Rule 25-30.432(5)(b) deviates from prior  
15 Commission practice whereby an allowance for fire flow capacity in  
16 composite used and useful plant calculations was considered, the impact on  
17 those utilities affected by a future reduction to used and useful  
18 percentages for source of supply and/or treatment plant due to such  
19 deviation from prior practice regarding fire flow allowance shall be  
20 considered on a case by case basis.

21       (c) Unaccounted for Water

22       1. To recognize conservation of water as a fundamental and proper  
23 concern of water system operation, water utilities are encouraged to

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1 exercise good operational and economic management toward preventing  
2 depletion and wasteful use of this important natural resource. Good  
3 modern water utility practice dictates that, wherever possible, all  
4 customer services and plant output and plant uses be metered and  
5 reasonable records be kept.

6 2. The Commission recognizes that some uses of water are readily  
7 measurable and others are not. Each utility is encouraged to establish  
8 procedures to measure or estimate the quantity of water used but not sold,  
9 by cause, and to maintain documentation for those measurements and  
10 estimates.

11 3. The Commission shall consider the amount of unaccounted for  
12 water in determining used and useful plant percentages and shall allow the  
13 American Water Works Association's (AWWA Manual M-8) design level of  
14 leakage (2-3 percent plus the standard 10 percent for a maximum of 12.5  
15 percent) without further explanation. The Commission may impute revenues  
16 or reduce purchased power and chemical expenses where inadequate  
17 explanation is given for unaccounted for water in excess of this amount.

18 (d) Infiltration and Inflow

19 1. The impact of infiltration and inflow on wastewater treatment  
20 and collection systems shall be considered in determining both the  
21 appropriate level of operation and maintenance expenses and used and  
22 useful plant percentages.

23 2. The Commission recognizes as reasonable the Infiltration

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1        Specification Allowances set forth in Water Pollution Control Federation  
2        (WPCF) Manual of Practice No. 9. Absent sufficient justification to the  
3        contrary, excess infiltration is defined as flows in excess of 500 gallons  
4        per day (gpd) per inch diameter of pipe per mile (gpd/in. diam./mile) for  
5        all gravity lines, including service laterals. Excessive inflow will be  
6        determined on a case-by-case basis if warranted.

7            (e) Cost/benefit Analysis - The Commission may order a utility to  
8        perform a cost/benefit analysis to determine the amount of water losses or  
9        wastewater infiltration and inflow that may be economically eliminated.  
10       If the cost/benefit analysis is ordered by the Commission in the course of  
11       evaluating a rate application, the actual or estimated prudent cost of the  
12       analysis shall be recovered through the revenues authorized in that rate  
13       proceeding, and the cost shall be amortized over five years. If the  
14       analysis is ordered outside of a formal rate proceeding, the utility may  
15       request the cost be recovered through a limited proceeding pursuant to  
16       section 367.0822, F.S.

17            (f) Used and Useful Analysis

18            1. As a part of its rate filing, each utility shall provide a  
19        determination of the used and useful percentage for each primary plant  
20        account along with the supporting formulas and documentation.

21            2. In lieu of presenting evidence in support of used and useful  
22        percentages, the utility may elect to use the default formulas in Rule 25-  
23        30.432(6), F.A.C., for calculating used and useful percentages for water

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1 supply, treatment, pumping and storage equipment, and wastewater treatment  
2 and effluent disposal equipment. Documentation in support of requested  
3 used and useful percentages for a water utility's transmission and  
4 distribution lines and a wastewater utility's pumping stations and  
5 collection mains (both gravity and force) shall be presented by the  
6 utility.

7 (6) Used and useful default formulas. The appropriate units to be  
8 used are included with each default formula. Because of the unique nature  
9 of a water system's transmission and distribution lines and a wastewater  
10 system's pumping stations and collection mains (both gravity and force),  
11 the default formulas presented here do not address these items; however,  
12 as stated in Rule 25-30.432(5)(f)2, the utility shall present  
13 documentation in support of requested used and useful percentages for  
14 these items.

15 (a) Small water systems (less than 1 million gallons per day (MGD)  
16 firm reliable capacity).

17 1. Small water systems with adequate reliable finished water  
18 storage capacity to meet the local fire flow ordinances and to meet the  
19 peak hour demand of its customers shall use the following formulas:

20 a. Water source of supply:

21 (Maximum Day Demand + Margin Reserve - Excessive Unaccounted  
22 For Water)/Firm Reliable Capacity (gpd)

23 b. Water treatment equipment:

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- 1                    (Maximum Day Demand + Margin Reserve - Excessive Unaccounted  
2                    For Water)/Firm Reliable Capacity (gpd)
- 3                    c.    Finished water storage:  
4                    (Equalization Volume + Fire Flow Requirement + Emergency  
5                    Storage + Margin Reserve)/Firm Reliable Capacity (gallons)
- 6                    d.    Water high service pumping:  
7                    (Instantaneous Demand + Margin Reserve - Excessive Unaccounted  
8                    For Water)/Firm Reliable Capacity (gpm)  
9                    or, if the utility chooses:  
10                   (Maximum Day Demand + Fire Flow Requirement + Margin Reserve -  
11                   Excessive Unaccounted For Water)/Firm Reliable Capacity (gpm)
- 12                   e.    Other water facilities: 100 percent used and useful
- 13                   2.    Small water systems with no storage facilities other than  
14                   hydropneumatic tanks or with insufficient storage capacity to meet the  
15                   local fire flow ordinances and to meet the instantaneous demand of its  
16                   customers shall use the following formulas:
- 17                   a.    Water source of supply:  
18                   (Instantaneous Demand + Margin Reserve - Excessive Unaccounted  
19                   For Water)/Firm Reliable Capacity (gpm)  
20                   or, if the utility can show it is the most economical way to  
21                   provide fire flow:  
22                   (Maximum Day Demand + Fire Flow Requirement + Margin Reserve -  
23                   Excessive Unaccounted For Water)/Firm Reliable Capacity (gpm)

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1           b. Water treatment equipment:

2                   (Instantaneous Demand + Margin Reserve - Excessive Unaccounted  
3                   For Water)/Firm Reliable Capacity (gpm)

4                   or, if the utility can show it is the most economical way to  
5                   provide fire flow:

6                   (Maximum Day Demand + Fire Flow Requirement + Margin Reserve -  
7                   Excessive Unaccounted For Water)/Firm Reliable Capacity (gpm)

8           c. Finished water storage: 100 percent used and useful (gallons)

9           d. Water high service pumping:

10                   (Instantaneous Demand + Margin Reserve - Excessive Unaccounted  
11                   For Water)/Firm Reliable Capacity (gpm)

12                   or, if the utility chooses:

13                   (Maximum Day Demand + Fire Flow Requirement + Margin Reserve -  
14                   Excessive Unaccounted For Water)/Firm Reliable Capacity (gpm)

15           e. Other water facilities: 100 percent used and useful

16           (b) Large water systems (1 MGD or greater firm reliable capacity):

17           1. Large water systems with adequate reliable finished water  
18           storage capacity to meet the local fire flow ordinances and to meet the  
19           peak hour demand of its customers shall use the following formulas:

20           a. Water source of supply:

21                   (Maximum Day Demand + Margin Reserve - Excessive Unaccounted  
22                   For Water)/Firm Reliable Capacity (gpd)

23           b. Water Treatment Equipment:

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1                   (Maximum Day Demand + Margin Reserve - Excessive Unaccounted  
2                   For Water)/Firm Reliable Capacity (gpd)

3           c.   Finished water storage:

4                   (Equalization Volume + Fire Flow Requirement + Emergency  
5                   Storage + Margin Reserve)/Firm Reliable Capacity (gallons)

6           d.   Water high service pumping:

7                   (Peak Hour Demand + Margin Reserve - Excessive Unaccounted For  
8                   Water)/Firm Reliable Capacity (gpm)

9                   or, if the utility chooses:

10                   Maximum Day Demand + Fire Flow Requirement + Margin Reserve -  
11                   Excessive Unaccounted For Water)/Firm Reliable Capacity (gpm)

12           A.   Other water facilities: 100 percent used and useful

13           2.   Large water systems with no storage facilities other than  
14           hydropneumatic tanks or with insufficient storage capacity to meet  
15           the local fire flow ordinances and to meet the peak hour demand of  
16           its customers shall use the following formulas:

17           a.   Water source of supply:

18                   (Peak Hour Demand + Margin Reserve - Excessive Unaccounted For  
19                   Water)/Firm Reliable Capacity (gpm)

20                   or, if the utility can show it is the most economical way to  
21           provide fire flow:

22                   (Maximum Day Demand + Fire Flow Requirement + Margin Reserve -  
23                   Excessive Unaccounted For Water)/Firm Reliable Capacity (gpm)

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1           b.    Water treatment equipment:

2                    (Peak Hour Demand + Margin Reserve - Excessive Unaccounted For  
3                    Water)/Firm Reliable Capacity (gpm)

4                    or, if the utility can show it is the most economical way to  
5                    provide fire flow:

6                    (Maximum Day Demand + Fire Flow Requirement + Margin Reserve-  
7                    Excessive Unaccounted For Water)/Firm Reliable Capacity (gpm)

8           c.    Finished water storage: 100 percent used and useful (gallons)

9           d.    Water high service pumping:

10                   (Peak Hour Demand + Margin Reserve - Excessive Unaccounted For  
11                   Water)/Firm Reliable Capacity (gpm)

12                   or, if the utility chooses:

13                   (Maximum Day Demand + Fire Flow Requirement + Margin Reserve-  
14                   Excessive Unaccounted For Water)/Firm Reliable Capacity (gpm)

15           e.    Other water facilities: 100 percent used and useful

16           (d) Wastewater systems:

17                1. Wastewater treatment equipment:

18                   (Wastewater Customer Demand + Margin Reserve - Excessive  
19                   infiltration and Inflow)/Permitted Capacity (gpd)

20                2. Effluent disposal facilities:

21                   (Wastewater Customer Demand + Margin Reserve - Excessive  
22                   Infiltration and Inflow)/Permitted Capacity (gpd)

23                3. Other wastewater facilities: 100 percent used and useful

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 Notice of workshop For (Date) 7/12-12/95 In Docket No. undocketed  
 Other \_\_\_\_\_

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	<u>NH/W/S/Scrub</u>		

Note: Items must be mailed and/or returned within one working day after issue unless specified here:

Print Shop Verification

Job Number 62 Verified By W.S  
Date and Time Completed 6-13 Job Checked For Correctness and Quality (initial) \_\_\_\_\_

Mail Room Verification

Date Mailed 6-14-95 Verified By DRUM

Handwritten calculations:  
10  
7  
-----  
17  
306  
-----  
323  
21  
-----  
344