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Public Service Commission

September 25, 2019

Robert C. Brannan, Esquire
Sundstrom & Mindlin, LLP
2548 Blairstone Pines Drive
Tallahassee, FL 32301
rbrannan@sfflaw.com

VIA EMAIL & US MAIL

Re: Docket No. 20190168-WS - Application for water and wastewater service in Duval, Baker, and Nassau Counties, by First Coast Regional Utilities, Inc.

Dear Mr. Brannan:

Staff has reviewed First Coast Regional Utilities, Inc.'s (First Coast Regional or Utility) application for original certificate. After reviewing this information we find the application to be deficient. The specific deficiencies are identified as:

1. **Florida Department of State, Division of Corporations Documentation.** Rule 25-30.033(1)(d)2., Florida Administrative Code, (F.A.C.), requires that the applicant provide documentation from the Florida Department of State, Division of Corporations, showing:
 2. The utility's fictitious name and registration number for the fictitious name. Please provide the required documentation from State Corporations.
2. **Legal description.** Rule 25-30.033(1)(j)1., F.A.C., requires that the applicant provide a legal description of the territory proposed to be served, in the format prescribed in Rule 25-30.029, F.A.C. Rule 25-30.029(2)(b), F.A.C., states that a complete and accurate description of the service area should be provided in either a sections format or a metes and bounds format. After discussing this requirement with First Coast's counsel in a meeting with staff on September 16, 2019, it appears that the metes and bounds format is most appropriate to the service territory being requested. Please amend the legal description to conform to the requirements of Rule 25-30.029, F.A.C.
3. **Territory map.** Rule 25-30.033(1)(j)3., F.A.C., requires an official county tax assessment map or other map showing township, range, and section with a scale such as 1" = 200' or 1" = 400', with the proposed territory plotted thereon, consistent with the legal description provided pursuant to Rule 25-30.033(1)(j)1., F.A.C. The map provided is not of sufficient scale to verify the territory description. Also, the map appears to show separate parcels that are contiguous with one another. Please provide a set of territory maps of sufficient size and scale that, together, clearly show the perimeter of the entire

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territory being requested, consistent with the requirements of Rule 25-30.029(2), F.A.C., and that meet all of the requirements of Rule 25-30.033(1)(j)3., F.A.C.

4. **Notice of Application.** Rule 25-30.030(6), F.A.C., states that all applications requiring noticing shall be deemed deficient until affidavits of noticing required by Sections 367.045(1)(e) and (2)(f), Florida Statutes, along with a copy of the notice, are filed with the Office of Commission Clerk. After staff has reviewed and approved the notice of application, and the notices have been distributed in accordance with Rule 25-30.030(5), F.A.C., please provide affidavits of noticing.

Your application will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than **October 25, 2019**, to the following address:

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Should you have any questions concerning the information in this letter, please feel free to contact Mrs. Melinda Watts by phone at (850) 413-6952 or email at mwatts@psc.state.fl.us for technical questions, or Ms. Kristen Simmons by phone at (850) 413-6175 or email at ksimmons@psc.state.fl.us for legal questions. Please include the docket number on all submissions to the Commission Clerk.

Sincerely,



Melinda Watts
Engineering Specialist

MW:jp

cc: Office of Commission Clerk (Docket No. 20190168-WS)