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FCRU's Response to Staff's 6<sup>th</sup>  
Interrogatories No. 50

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for water and wastewater service in Duval, Baker, and Nassau Counties, by First Coast Regional Utilities, Inc.	DOCKET NO. 20190168-WS DATED: October 20, 2021
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FIRST COAST REGIONAL UTILITIES, INC.'S RESPONSE TO  
STAFF'S AMENDED SIXTH SET OF INTERROGATORIES TO FIRST COAST  
REGIONAL UTILITIES, INC. (NO. 50)

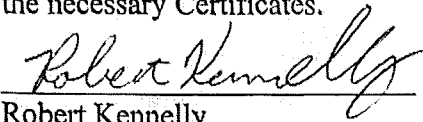
First Coast Regional Utilities, Inc. ("Applicant" or "FCRU" or the "Utility"), pursuant to rule 1.340, Florida Rules of Civil Procedure, responds to Staff's Amended Sixth Interrogatories to Applicant.

INTERROGATORIES

50. Please refer to witness Kennelly's rebuttal testimony, page 7, lines 15 through 20. Witness Kennelly references homebuilders interested in purchasing lots and building homes, provided utility services will be available when the homes are built. Witness Kennelly goes on to state on lines 18 and 19 that "this can be accomplished if we can deliver the utility services in 30 months." Please indicate the approximate date the witness was referring to regarding delivering utility services in 30-months.

**Response:** Respectfully, there was no specific date associated with the delivery of utility services. The 30 months I referenced in my rebuttal testimony was intended to run from the date the Commission approved FCRU's Application and granted the requested Certificates as several of the necessary permits cannot be issued or applied for until the Utility is granted its Certificates. Absent the current protest, and taking into account a reasonable period for the Commission to consider the Application, FCRU believes it could have begun providing service to the property sometime during the late summer 2022. The protracted nature of JEA's protest, however, has substantially delayed the project. During the pendency of this matter the housing market in general and interest in new home building

in Florida, including and on our site, has only intensified. Our engineers have confirmed that the necessary facilities can still be designed, permitted, constructed and brought online in 30 months from the date the Commission approves First Coast's Application and issues the necessary Certificates.

  
Robert Kennelly

Respectfully submitted this 20<sup>th</sup> day of October, 2021, by:

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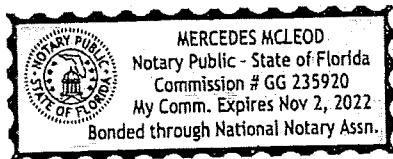
AFFIDAVIT

STATE OF FLORIDA

COUNTY OF St Johns

I hereby certify that on this 20 day of October, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, appeared Robert Kennelly, who is personally known to me, and he acknowledged before me that he provided the answers to interrogatory number 50 from Staff's Sixth Set of Interrogatories to First Coast Regional Utilities, Inc. (No. 50) in Docket No. 20190168-WS, and that the responses are true and correct based on his personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid on the date aforesaid.



*Mercedes M. McLeod*  
Notary Public  
State of Florida, at Large

My Commission Expires:  
11-02-22