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FCRU's Response to Staff's 1st Request for
Production of Documents Nos. 1-9

(including attachments for Nos. 3-9)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for Original Certificate of)	DOCKET NO. 20190168-WS
Authorization and Initial Rates and Charges)	
for Water and Wastewater Service in Duval,)	FILED: June 26, 2020
Baker and Nassau Counties, Florida by)	
FIRST COAST REGIONAL UTILITIES, INC.)	
_____)	

**FIRST COAST REGIONAL UTILITIES, INC.'S RESPONSE
TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO FIRST COAST REGIONAL UTILITIES, INC.**

First Coast Regional Utilities, Inc. ("Applicant" or "First Coast"), pursuant to rule 1.350, Florida Rules of Civil Procedure, responds to Staff's First Request for Production of Documents to Applicant.

**APPLICANT'S RESPONSES TO STAFF'S
SPECIFIC REQUESTS FOR PRODUCTION**

Please refer to witness Beaudet's direct testimony, Exhibit BAB-2.

Request 1: Please refer to page 12, section 4.1. Please provide documentation supporting a minimum size on-site water treatment plant of one million gallons per day average daily flow design basis, as recommended by JEA.

Response: While Applicant does not possess documentation responsive to this request, a well-known historic non-rule policy of the JEA is to build no plants smaller than 1.0 MGD. First Coast is obligated to build to JEA standards per the City of Jacksonville development order. First Coast is willing to build smaller facilities; however, in the opinion of our engineer, Bevin Beaudet, it is not cost effective in the long run to do so.

Request 2: Please refer to page 12, section 4.2. Please provide documentation supporting a minimum size on-site wastewater treatment plant of one million gallons per day average daily flow design basis, as recommended by JEA.

Response: While Applicant does not possess documentation responsive to this request, a well-known historic non-rule policy of the JEA is to build no plants smaller than 1.0 MGD. First Coast is obligated to build to JEA standards per the City of Jacksonville development order. First Coast is willing to build smaller facilities; however, in the opinion of our engineer, Bevin Beaudet, it is not cost effective in the long run to do so.

Request 3: Please refer to page 23-24. Please provide the relevant portions of the JEA Water and Wastewater Standards Manual used to develop the internal infrastructure costs.

Response: The sections of the JEA Water & Wastewater Standards are Section 350, Potable Water Mains; Section 428, Gravity Wastewater and Section 429, Wastewater Force Mains. These documents are being produced.

Request 4: Please refer to witness Beaudet's direct testimony, Exhibit BAB-2, page 20; and witness Kennelly's direct testimony, Exhibit RK-1, Exhibit "F", pages 1-3. Please provide a copy of the FEMA flood maps referenced in witness Beaudet's direct testimony with the land under plant, as described in the legal description in the special warranty deed, marked thereon.

Response: The relevant FEMA flood maps are being produced.

Request 5: Please provide documentation from the Florida Department of State, State Corporations Division confirming First Coast's fictitious name has been registered.

Response: This documentation is being produced.

Request 6: Please provide a copy of the final version of the legal description of the territory proposed to be served that was provided to the Commission on November 7, 2019, in response to item 2 of staff's September 25, 2019 deficiency letter to First Coast.

Response: The legal description provided to the Commission on November 7, 2019 is being produced.

Request 7: Please provide a copy of the final version of the territory maps that were 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., that were provided to the Commission on November 7, 2019, in response to item 2 of staff's September 25, 2019 deficiency letter to First Coast.

Response: The final versions of the territory maps that were provided to the Commission on November 7, 2019 are being produced.

Request 8: Please provide a copy of the affidavit(s) of notice, along with a copy of the notice, that attested to:

- a. First Coast's compliance with Rule 25-30.030(5)(a), F.A.C.
- b. First Coast's compliance with Rule 25-30.030(5)(b), F.A.C.
- c. First Coast's compliance with Rule 25-30.030(5)(c), F.A.C., for Baker County, Duval County, and Nassau County

Response: The copies of affidavits of notice, along with the copy of the notices, are being produced.

Request 9: Please provide a copy of Baker County's Comprehensive Plan.

Response: A copy of the Baker County Comprehensive Plan, Future Land Use Element, is being produced.

Respectfully submitted this 26th day of June, 2020, by:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail to the following this 26th day of June, 2020.

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