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FCRU's Response to Staff's 3<sup>rd</sup> Request  
for Production of Documents Nos. 12-13

(including attachment for No. 12)

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: August 28, 2020
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**FIRST COAST REGIONAL UTILITIES INC.'S RESPONSE TO  
STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO  
FIRST COAST REGIONAL UTILITIES, INC. (NOS. 12-14)**

First Coast Regional Utilities, Inc. ("Applicant" or "First Coast"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, responds to Staff's Third Request for Production of Documents.

12. **Request:** Please provide all documentation and workpapers supporting witness Swain's direct testimony, Exhibit DDS-1, pages 6 and 7.

**Response:**

With regard to the Schedule of Projected Water and Wastewater Plant: Mr. Beudet's handwritten Raw Labor Worksheet, and the Annual Reports of Rolling Oaks Utilities and Royal Utilities are attached.

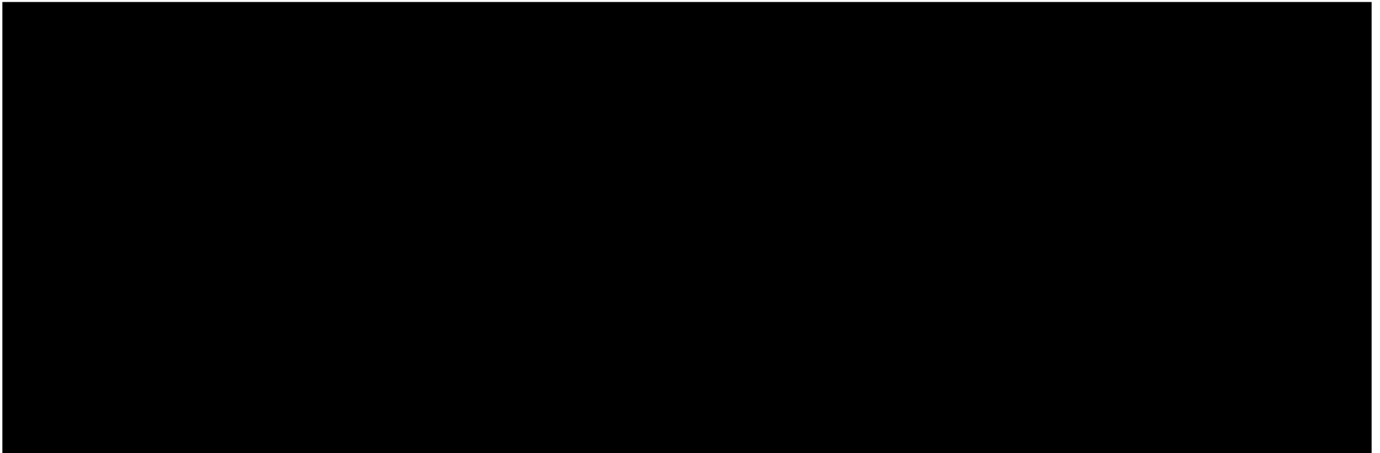
Organization Costs – a listing of the Organizational Costs is attached.

Accumulated Depreciation – The relevant workpapers are included in Exhibit DDS-1 pages 8-13.

13. **Request:** Please provide all documentation, including Excel files, used to calculate and support the accumulated depreciation of plant, Contributions in Aid of Construction (CIAC), accumulated amortization of CIAC, and Operating and Maintenance (O&M) expense reflected in witness Swain's direct testimony, Exhibit DDS-1, pages 8 - 15.

**Response:** With regard to Plant, Contributions in Aid of Construction (CIAC), accumulated amortization of CIAC, there are no additional workpapers. Exhibit DDS-1, pages 8 – 13 are images of the actual workpapers.

With regard to Operating and Maintenance (O&M) expense, Mr. Beaudet's Raw Labor Worksheet, and the Annual Reports for Royal Utilities and Royal Oaks Utilities are attached in response to Request #12 above.



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service in Duval, Baker, and Nassau Counties,  
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DOCKET NO. 20190168-WS

DATED: August 28, 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by  
electronic mail to the following:

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