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FCRU's Response to Staff's 4th Request
for Production of Documents No. 16

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: November 30, 2020
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FIRST COAST REGIONAL UTILITIES, INC.'S RESPONSE TO
STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS TO
FIRST COAST REGIONAL UTILITIES, INC. (NOS. 15 – 16)

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

DOCUMENTS REQUESTED

15. Please refer to JEA’s Response in Opposition to First Coast Regional Utilities’ Motion for Partial Summary Final Order, page 13, the third paragraph where it references, “An affidavit of David Haas, the individual who provided the language at Block 3 on page 26 of 28 in 2011 is attached hereto, indicating that was not his intent in providing the language sought to be removed.” Please provide a copy of the referenced affidavit.

Response: FCRU does not have such affidavit.

16. Please refer to JEA’s Response in Opposition to First Coast Regional Utilities’ Motion for Partial Summary Final Order, Exhibit A – Application for Minor Modification to a PUD, Application No. MM-20-08. Please provide a copy of all documents filed by First Coast with the City of Jacksonville Department of Planning and Development in the proceedings for Application No. MM-20-08 to date, and all documents issued in this case by the City of Jacksonville Department of Planning and Development to date.

Response: FCRU is not a party to the Application for Minor Modification to the ICI Villages PUD and has neither filed any documents with the City of Jacksonville Department of

Planning and Development in the subject proceedings, nor has the City forwarded any documents to First Coast with regard to said proceedings.

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