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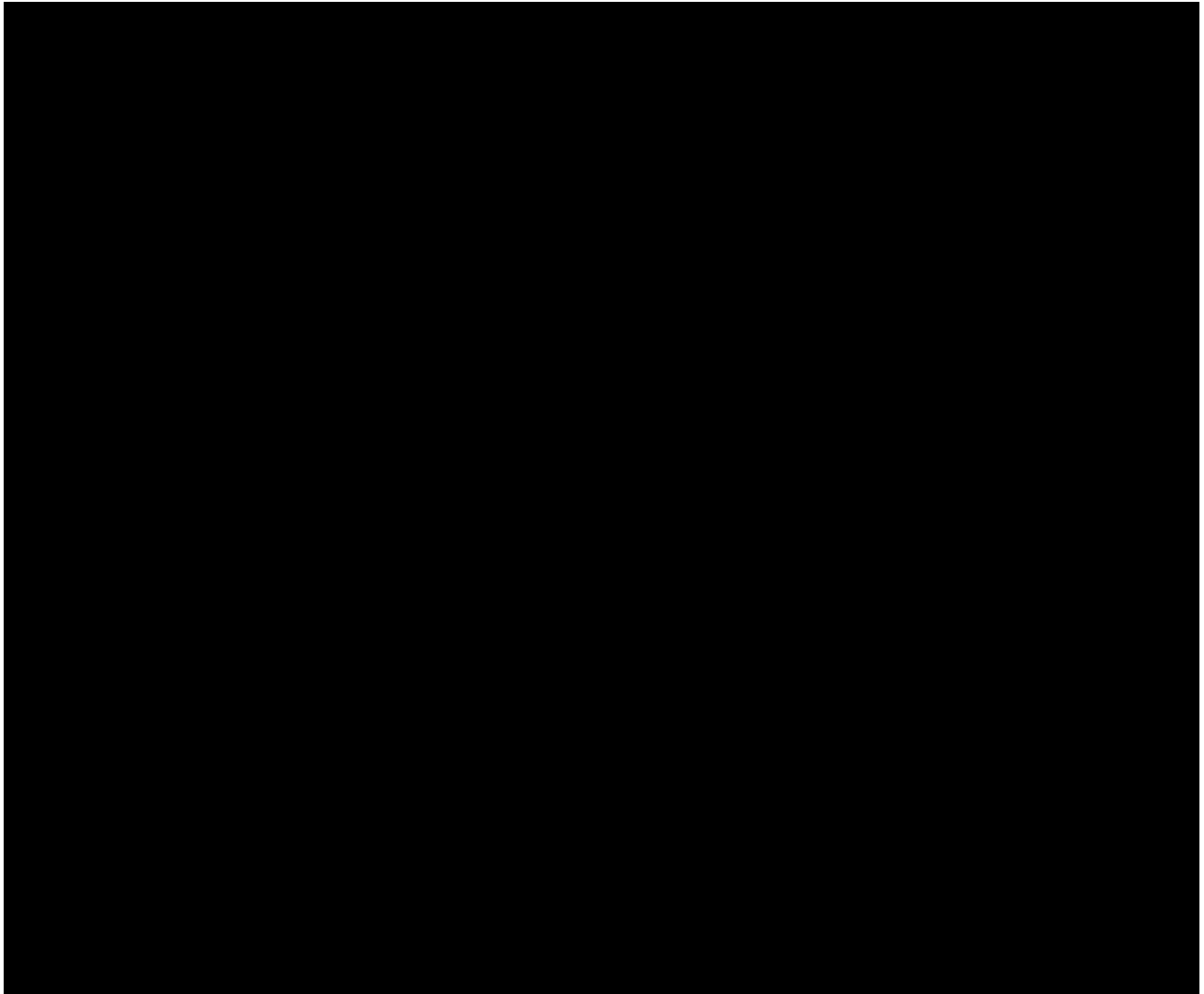
JEA's Response to FCRU's 1st
Interrogatories Nos. 6-7

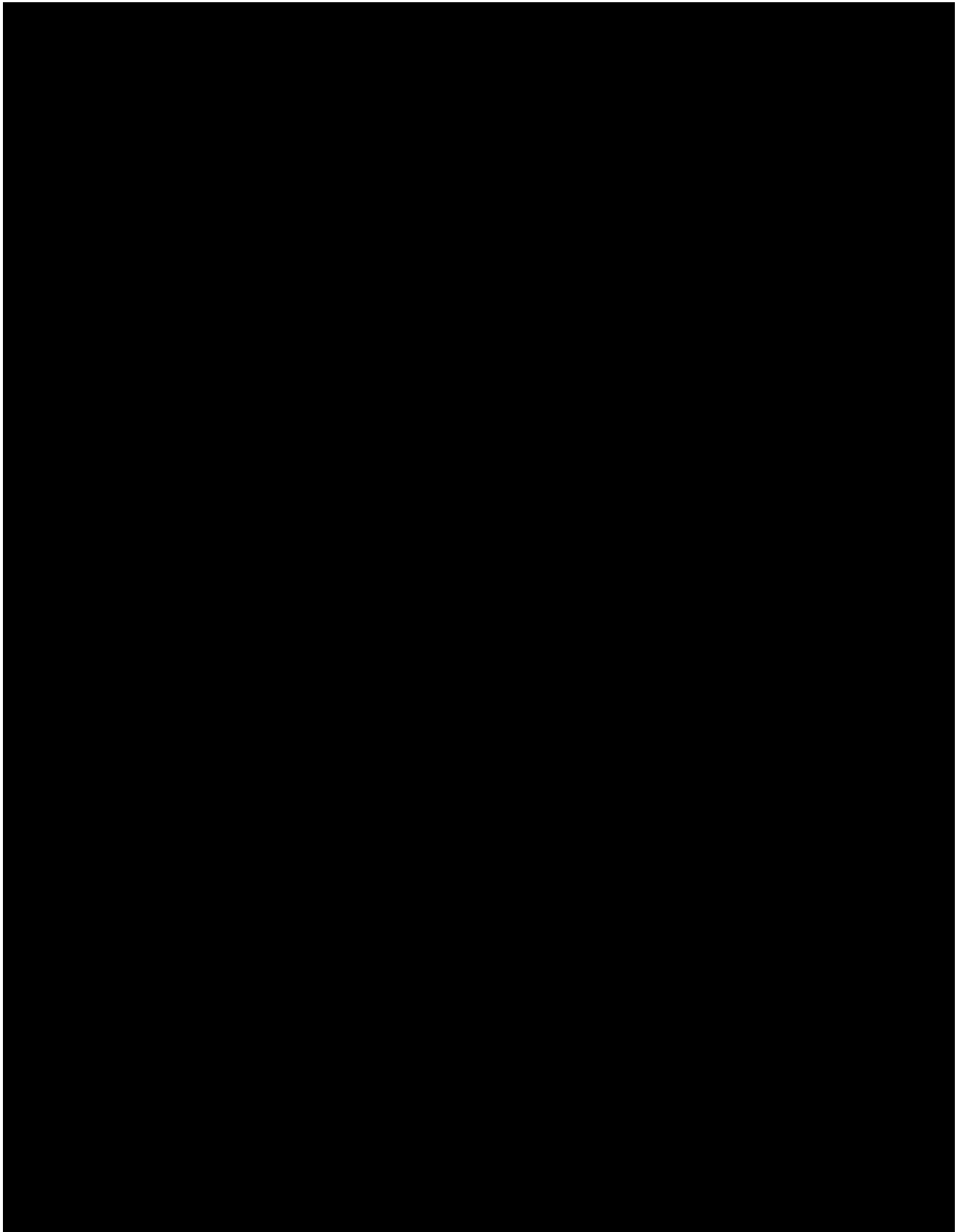
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

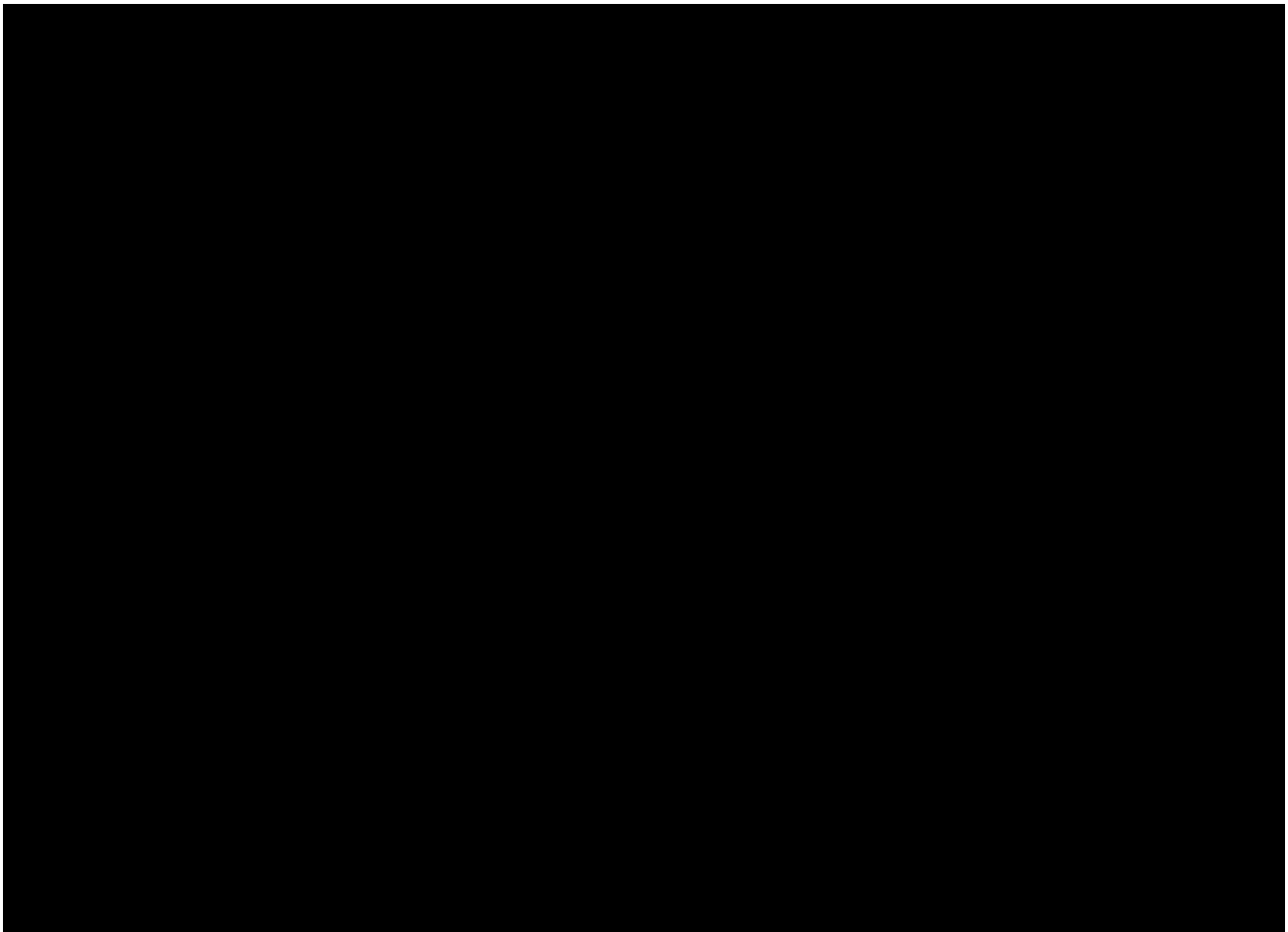
In re: Application for Original Certificate of)	DOCKET NO. 20190168-WS
Authorization and Initial Rates and Charges)	
for Water and Wastewater Service in Duval,)	FILED:
Baker and Nassau Counties, Florida by)	
FIRST COAST REGIONAL UTILITIES,)	
INC.)	
_____)	

**JEA’S ANSWERS TO FIRST COAST REGIONAL UTILITIES, INC.’S
FIRST INTERROGATORIES TO JEA**

JEA, pursuant to rule 1.340, Florida Rules of Civil Procedure, responds to Applicant First Coast Regional Utilities, Inc.’s (“Applicant’s”) First Interrogatories to JEA as follows:







Interrogatory 6: If it is your position that the granting of First Coast's application will adversely affect or impact your present or future utility operations, please state with specificity and particularity the type and manner of such impact; the timing of such impact; and the extent, nature, and severity of such impact.

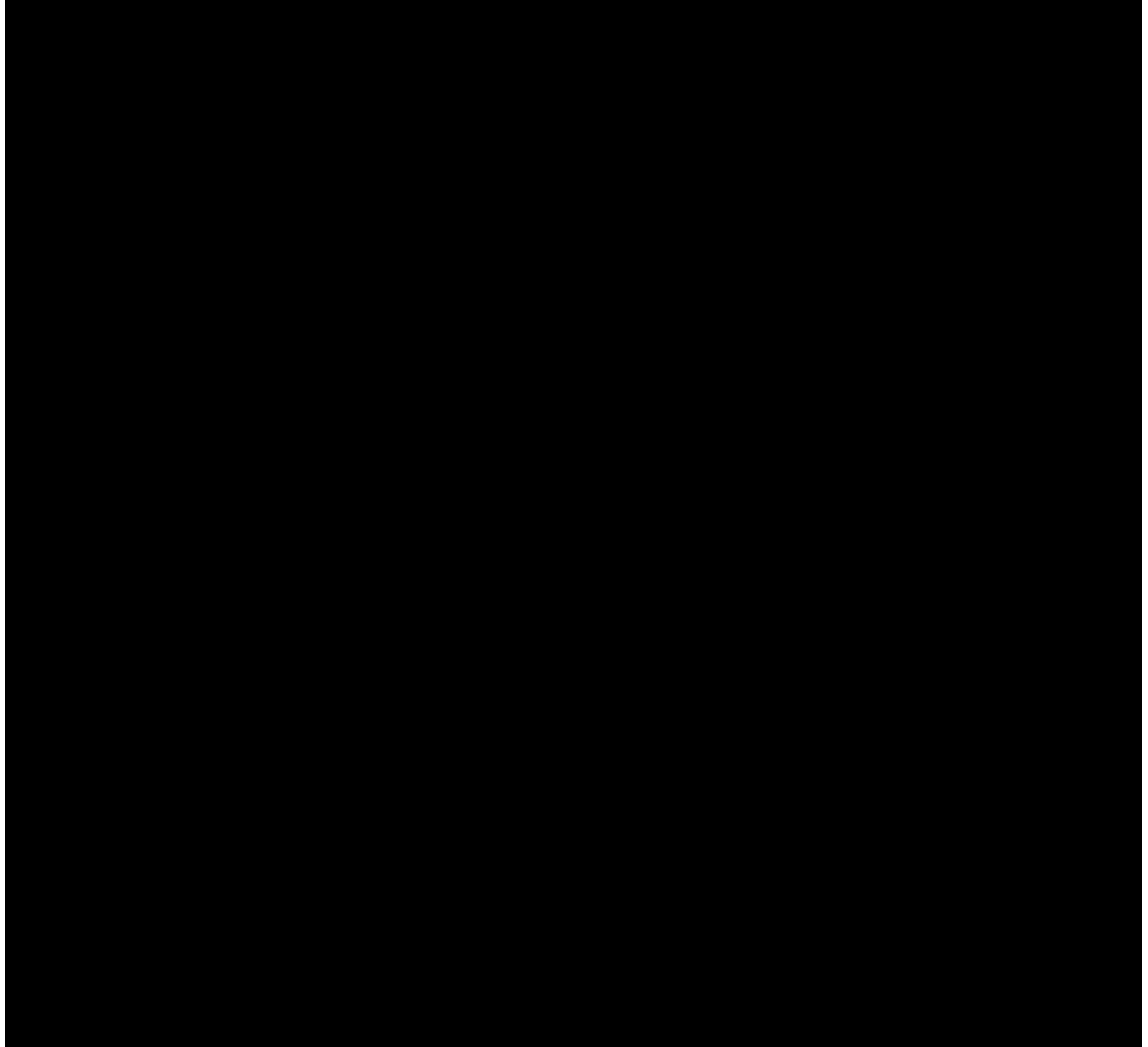
Answer: JEA has exclusive franchise agreements with the City of Jacksonville and Nassau County to provide water and wastewater service in the portions of the proposed development within Duval and Nassau counties. Moreover, the City of Jacksonville planned unit development ordinance to which the development is subject requires the developer to construct at its own expense adequate water and wastewater treatment facilities and then dedicate the same to JEA for operation and maintenance or for contract operation. Notwithstanding the illegal

encroachment of JEA's service territory, violation of the PUD ordinance, and JEA's other objections to the Application, JEA's operations would be adversely affected by issuance of a certificate to First Coast by the virtual certainty that the Applicant would ultimately become dependent on JEA. In Duval County, there are three private utilities. Each one existed before JEA owned and operated the utilities in Duval County. Normandy Village is entering into a FDEP Consent order for failure to meet effluent limits. FDEP has contacted JEA to ask if JEA could handle the additional wastewater if the private utility was unable to financially comply. Regency Utilities has abandoned all potable water treatment and only provides water and wastewater service through a bulk meter with JEA. Neighborhood Utilities is a water-only utility which uses JEA as a backup source of water. Even though it is operating, the owner has contacted JEA to inquire if JEA would purchase the system.

Interrogatory 7: JEA's Petition states that it is ready, willing and able to provide service to the territory sought by the Applicant. Please describe with particularity how and when JEA will provide water and wastewater utility service to the Applicant's proposed service area.

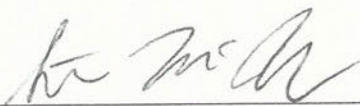
Answer: The planned unit development approved for the service area (City of Jacksonville Ordinance 2010-874), provides in pertinent part: "The Applicant shall provide, at its expense, on-site treatment capacity to serve the needs of this Rural Village PUD for potable water, wastewater, and reuse water at levels and to standards acceptable to JEA, to be dedicated to JEA for operation and maintenance or for contract operation." JEA has provided Applicant with its standards and multiple alternatives by which the Applicant can provide, at the Applicant's expense as required by the PUD, capacity to serve the needs of the service area. Upon

dedication to JEA as required by the PUD, JEA is ready, willing, and able to provide operation and maintenance, or to contract for operation.



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JEA

Signed By: 

Printed Name: Steven McInall

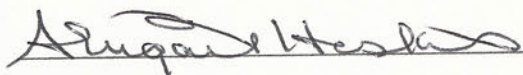
Title: VP, Energy and Water Planning

STATE OF FLORIDA

COUNTY OF DUVAL

BEFORE ME, the undersigned authority, personally appeared Steven McInall
as a representative of JEA, who, being duly sworn, deposes and swears that the above Answers
to Interrogatories are true and correct.

SWORN TO AND SUBSCRIBED before me on this 18th day of May, 2020.



Notary Public

My Commission expires:



As to objections:

/s/ Thomas A. Crabb
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