

57

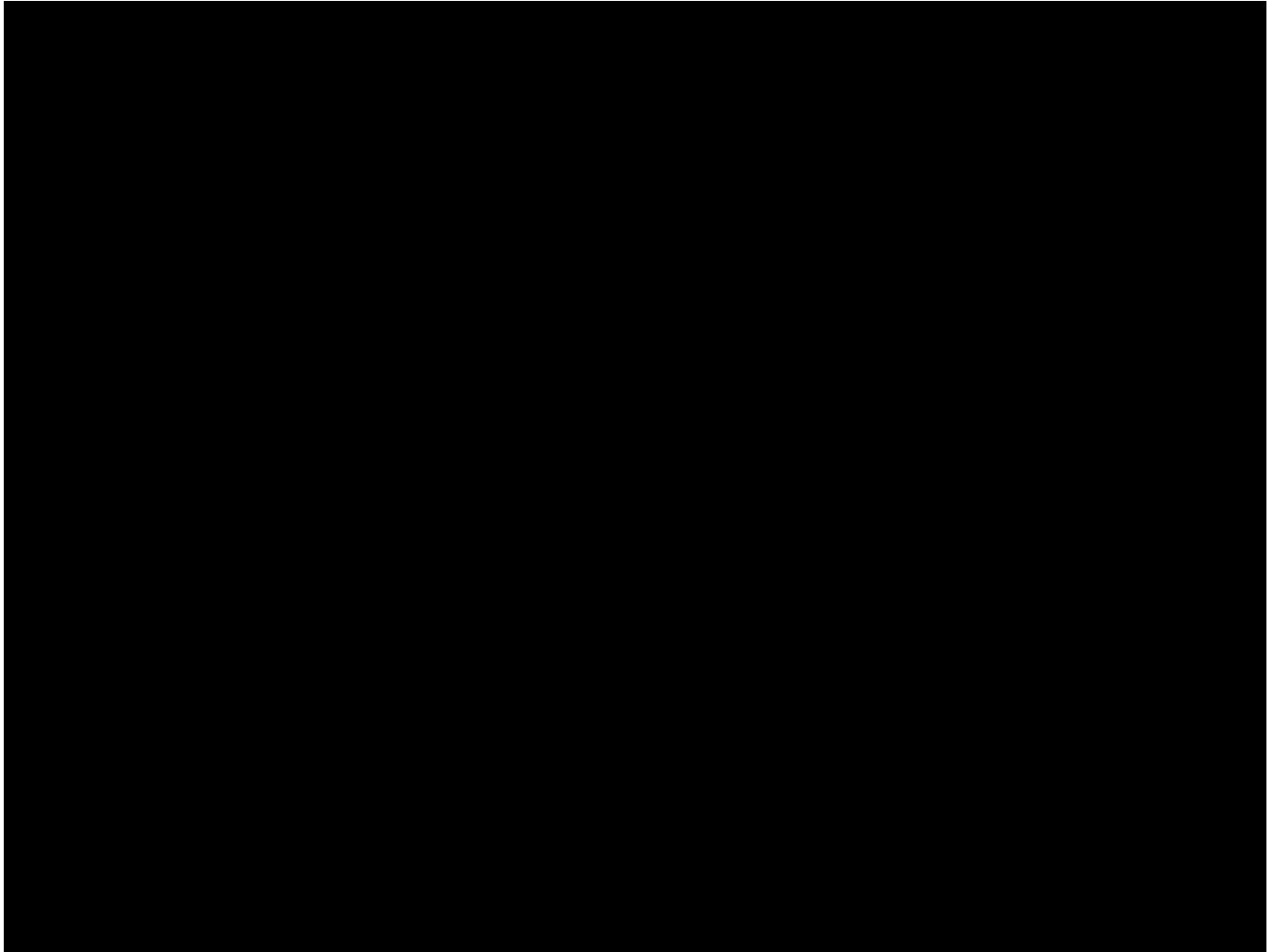
JEA's Response to FCRU's 3rd
Interrogatories Nos. 58-59, 63, 67-71, 76-78,
105, and 110-112

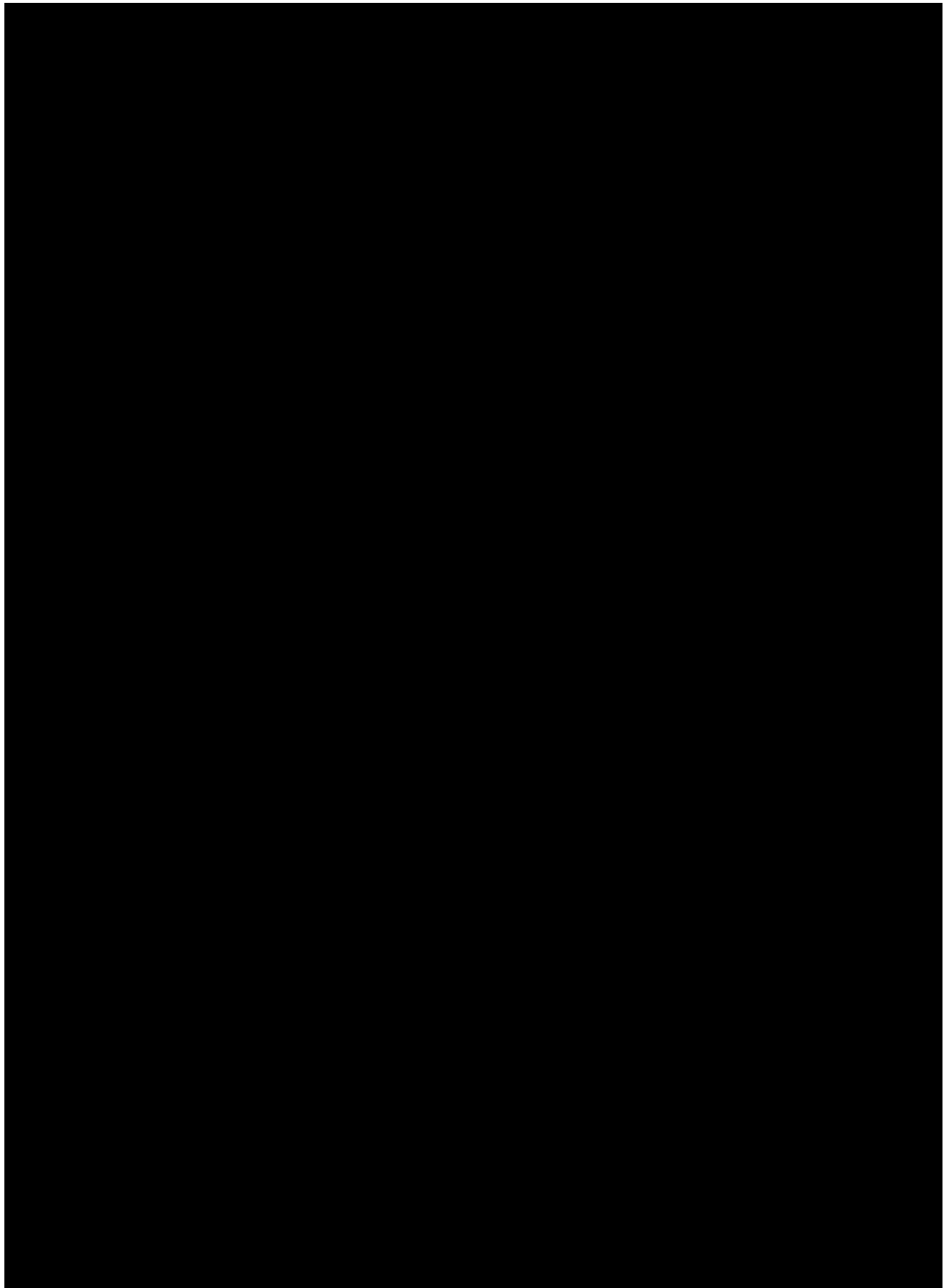
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

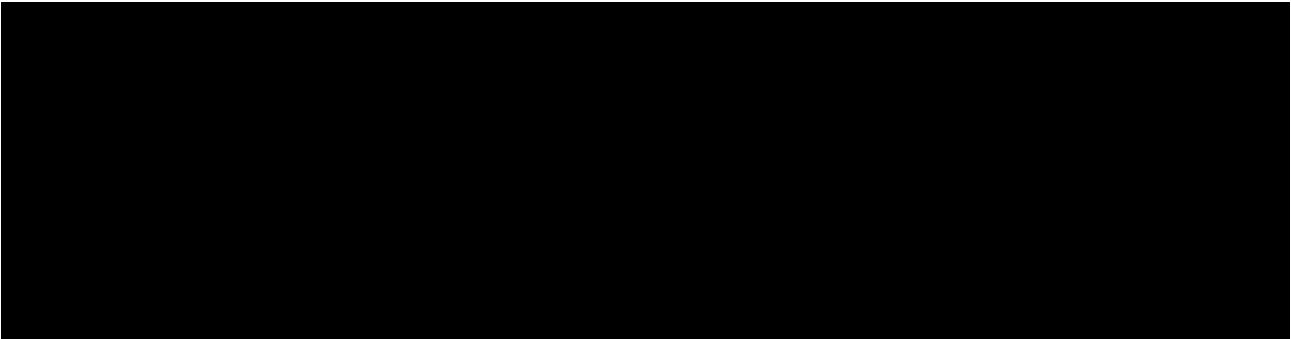
In re: Application for Original Certificate of)	DOCKET NO. 20190168-WS
Authorization and Initial Rates and Charges)	
for Water and Wastewater Service in Duval,)	FILED:
Baker and Nassau Counties, Florida by)	
FIRST COAST REGIONAL UTILITIES,)	
INC.)	
_____)	

JEA’S ANSWERS TO FIRST COAST REGIONAL UTILITIES, INC.’S
THIRD INTERROGATORIES TO JEA
(INTERROGATORIES 53-113)

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







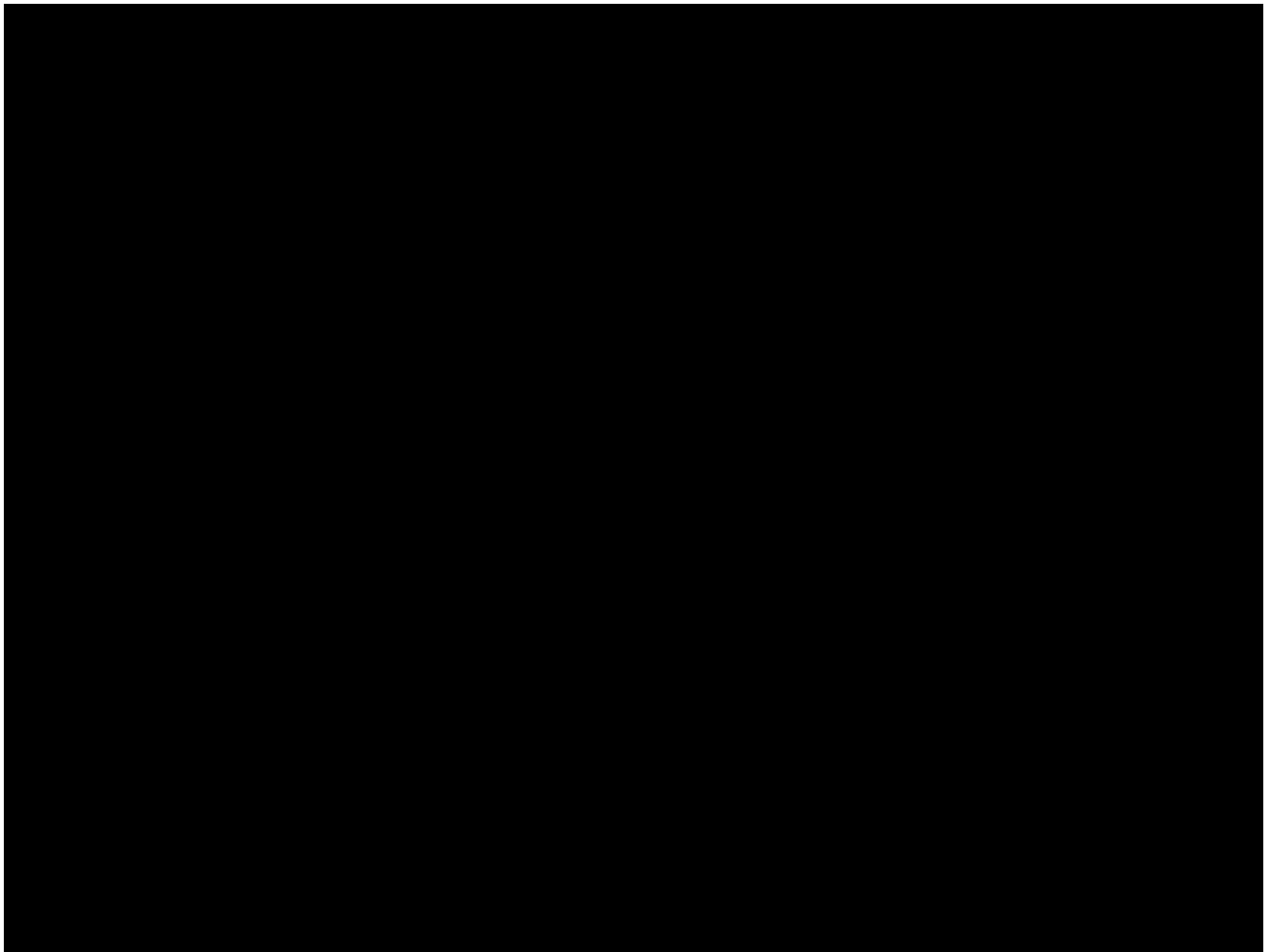
Interrogatory 58: Please state, with specificity, what Florida law authorizes the City of Jacksonville to enter into a Franchise Agreement with JEA.

Answer: Chapter 180, Florida Statutes, other laws as applicable, and see JEA's Motion for Summary Final Order.

Interrogatory 59: What is the ownership relation of the City of Jacksonville and the JEA?

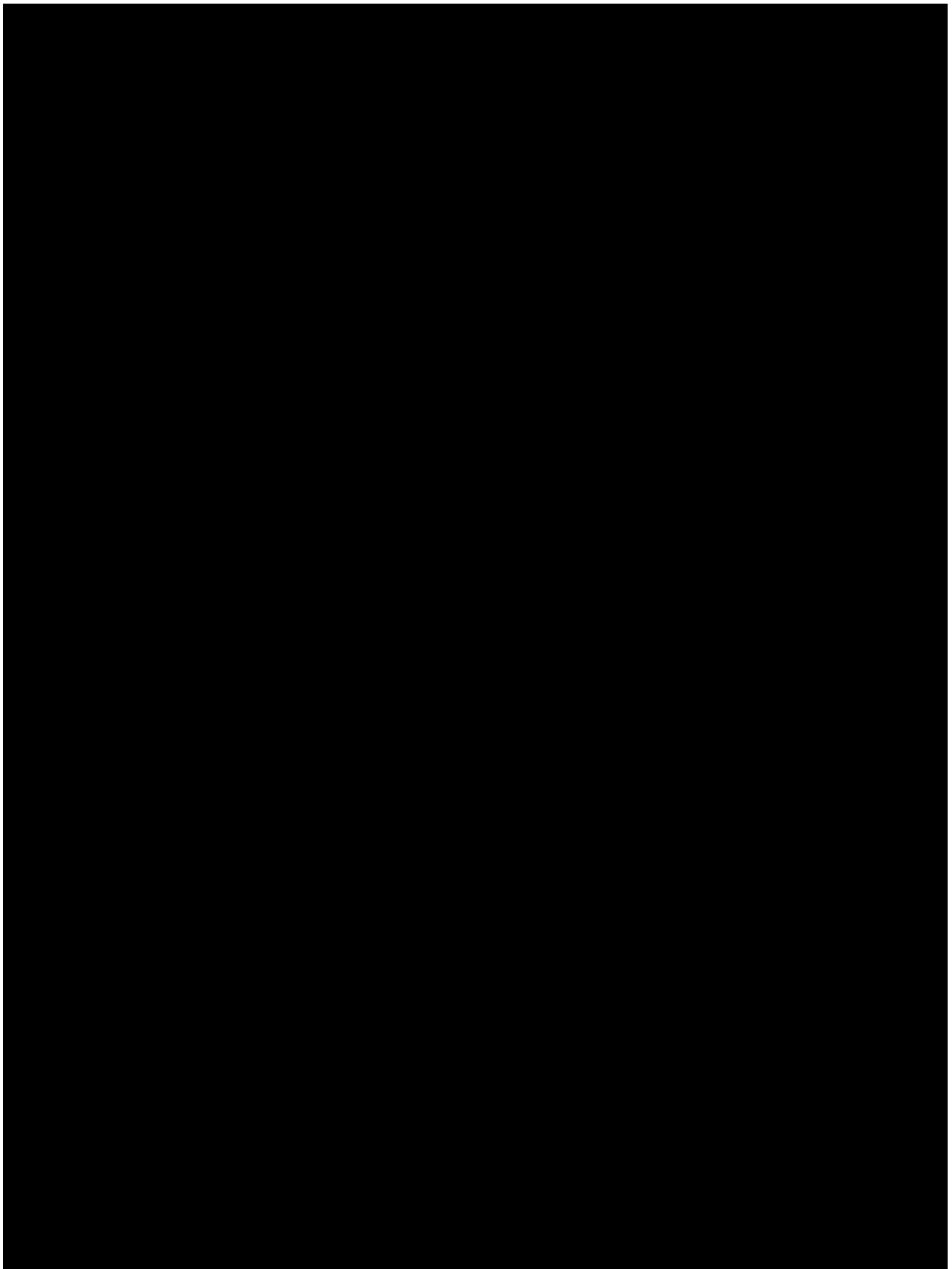
Answer: JEA is wholly owned by the City of Jacksonville.

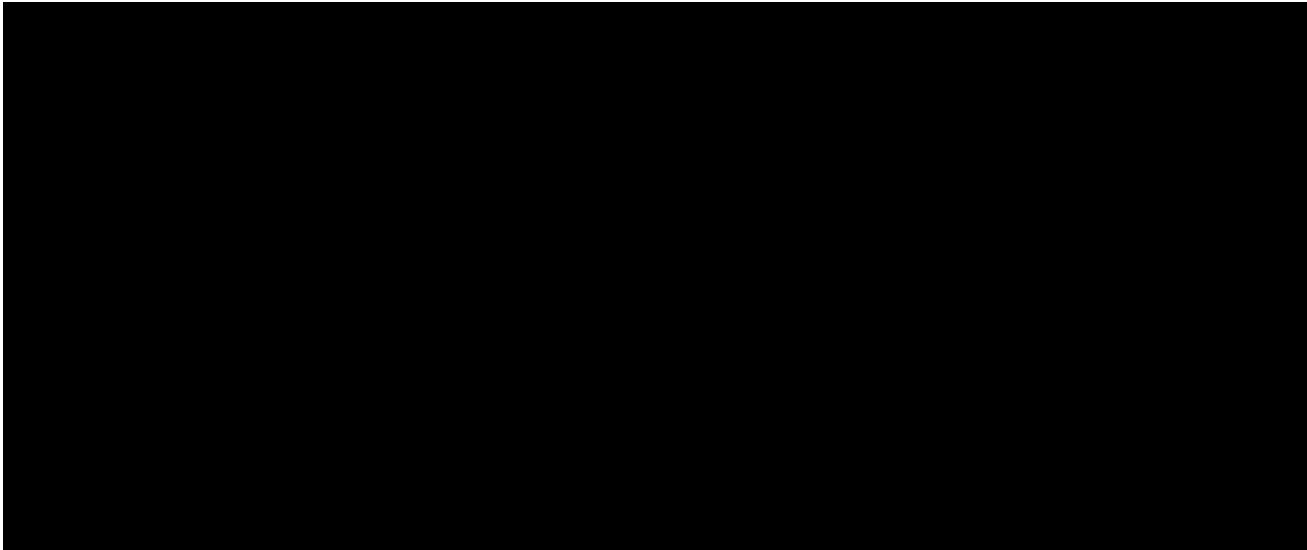




Interrogatory 63: If 301 Capital Partners were to somehow agree to receive service from JEA, or enter into a contract operations agreement, how will JEA guarantee that future JEA management will abide with the terms, timing and conditions of the agreement?

Answer: JEA would require that any contract with 301 Capital Partners be enforceable by a court with jurisdiction over the parties and subject matter.





Interrogatory 67: Is it the intention of JEA to provide reclaimed water service, under pressure, to the proposed First Coast service area?

Answer: Yes, provided the developer complies with the PUD Ordinance. Under the PUD Ordinance, it is 301 Capital Partners' obligation to provide, at its expense, on-site treatment capacity for reuse water at levels and to standards acceptable to JEA, to be dedicated to JEA for operation and maintenance or for contract operation.

Interrogatory 68: If the answer to Interrogatory 67 above is yes, please state, with specificity, how the JEA would go about providing such reclaimed water service to the proposed First Coast area, and at what specific pressure, expressed in pounds per square inch, that such reclaimed water would be delivered.

Answer: It is for the developer to provide reuse water treatment capacity. Operational pressures must be similar to JEA's existing reclaimed water system, 40 to 70 psi.

Interrogatory 69: If the answer to Interrogatory 67 above is yes, please advise when JEA would be able to provide reclaimed water service to the FCRU proposed area.

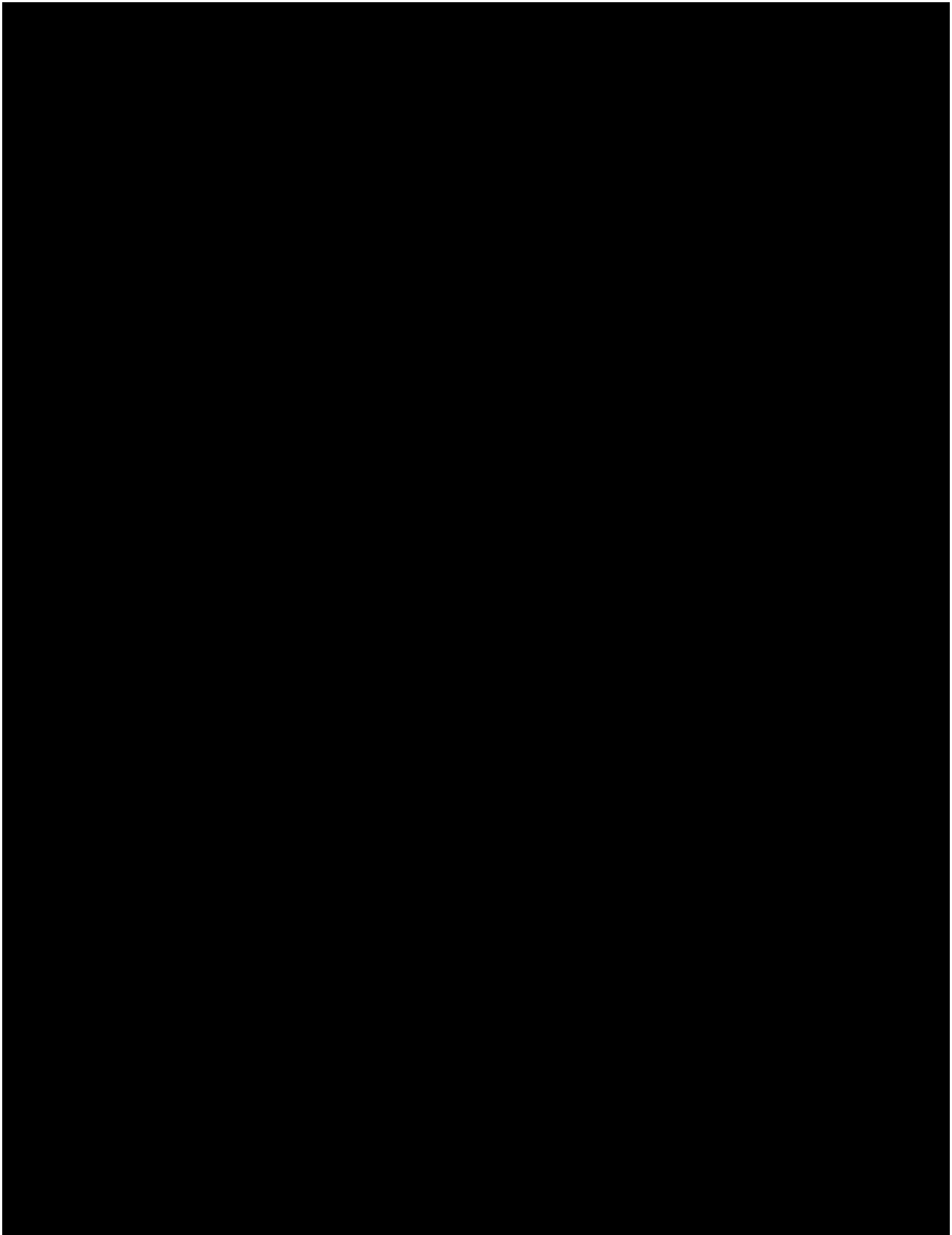
Answer: At such time as the developer complies with the PUD Ordinance.

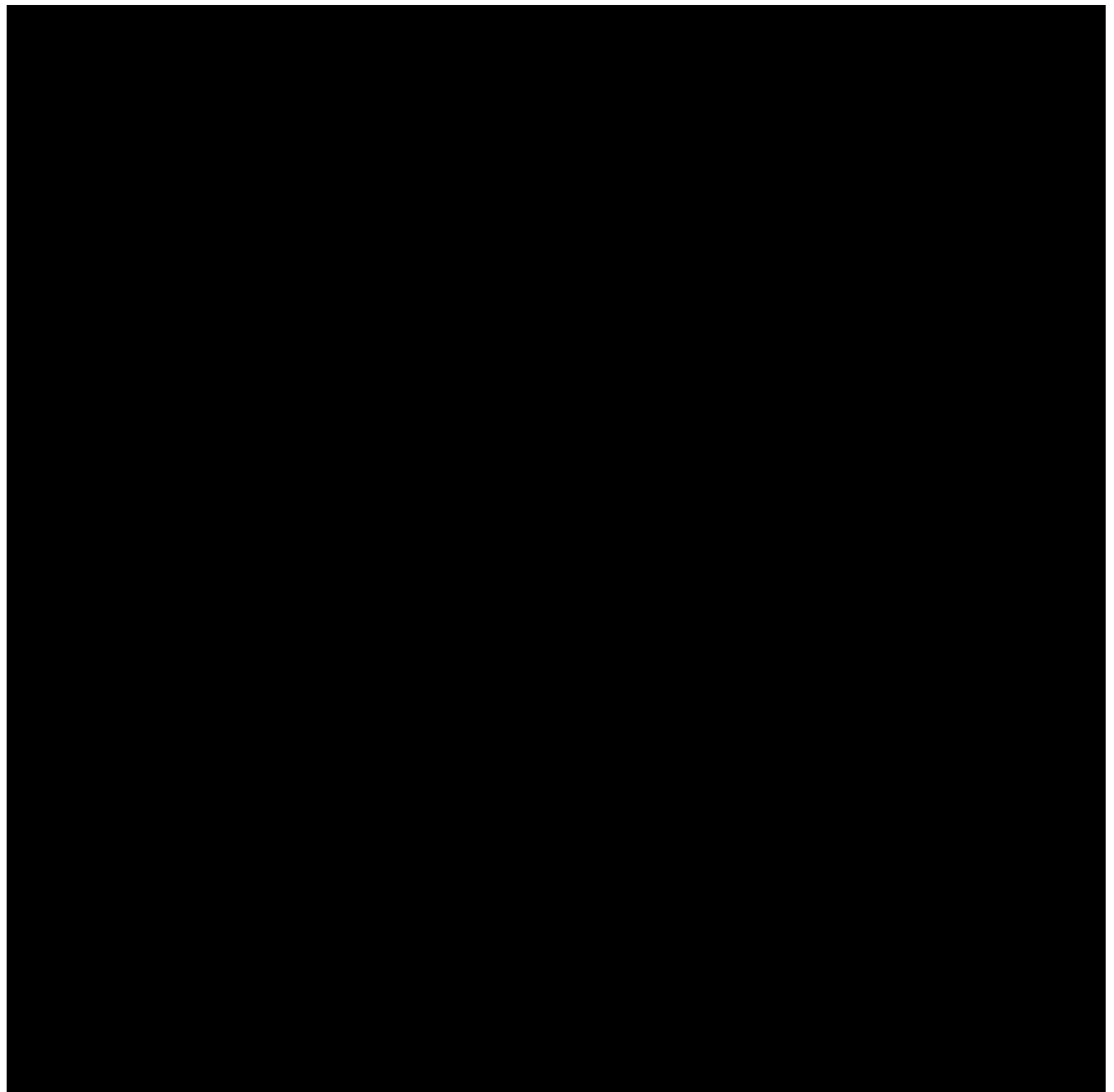
Interrogatory 70: If the answer to Interrogatory 67 above is yes, from what specific facility or facilities would JEA source the reclaimed water for service to the FCRU proposed area.

Answer: Under the PUD Ordinance, it is for the developer to provide reuse water treatment capacity, which could be constructed onsite. Prior discussions with the developer also included connecting to a new regional facility constructed at JEA expense, which idea the developer rejected.

Interrogatory 71: What is the anticipated cost of providing reclaimed water service from JEA's existing facilities to the proposed FCRU service area?

Answer: JEA does not have existing facilities providing reclaimed water service to the proposed service area. Under the PUD Ordinance, the cost of providing facilities for the reuse water treatment capacity is a cost to the developer, not to JEA.





Interrogatory 76: Previously, the JEA proposed that 301 Capital Partners build a new WWTP on the Peterson tract. Please describe, with specificity, the pipeline route that JEA would propose to interconnect the Peterson tract WWTP to the proposed First Coast service area.

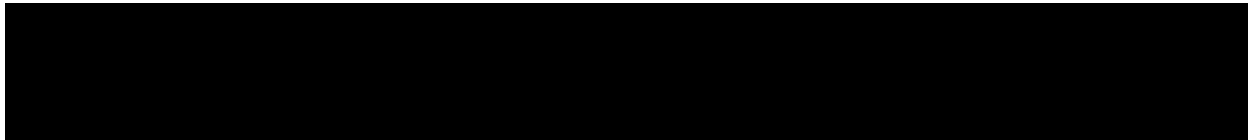
Answer: JEA's prior, preliminary, discussions with 301 Capital Partners did not include a pipeline route set forth "with specificity." JEA has no pending proposals, as 301 Capital Partners has rejected all JEA proposals to date.

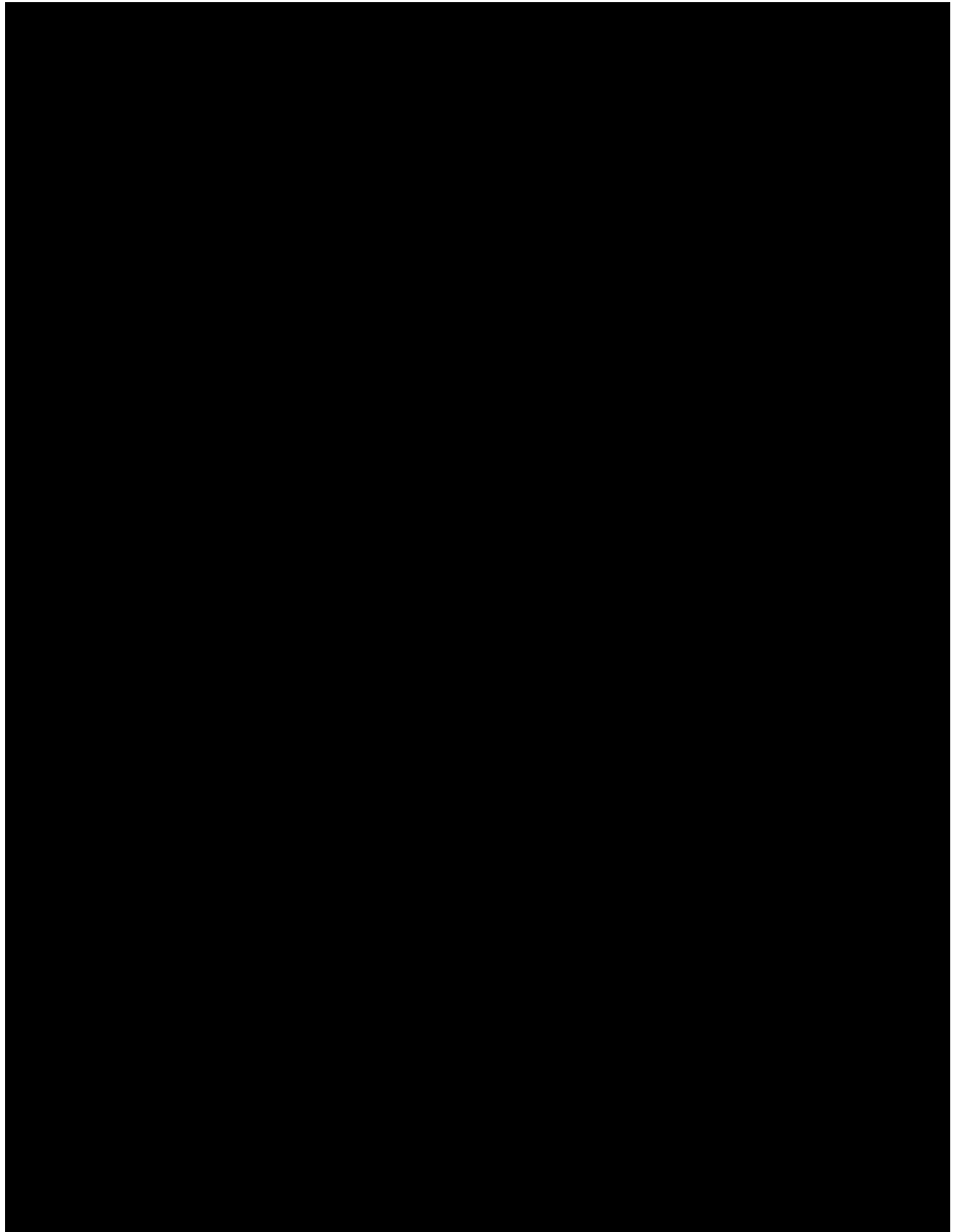
Interrogatory 77: What easements would JEA provide to interconnect the Peterson tract to the proposed First Coast service area?

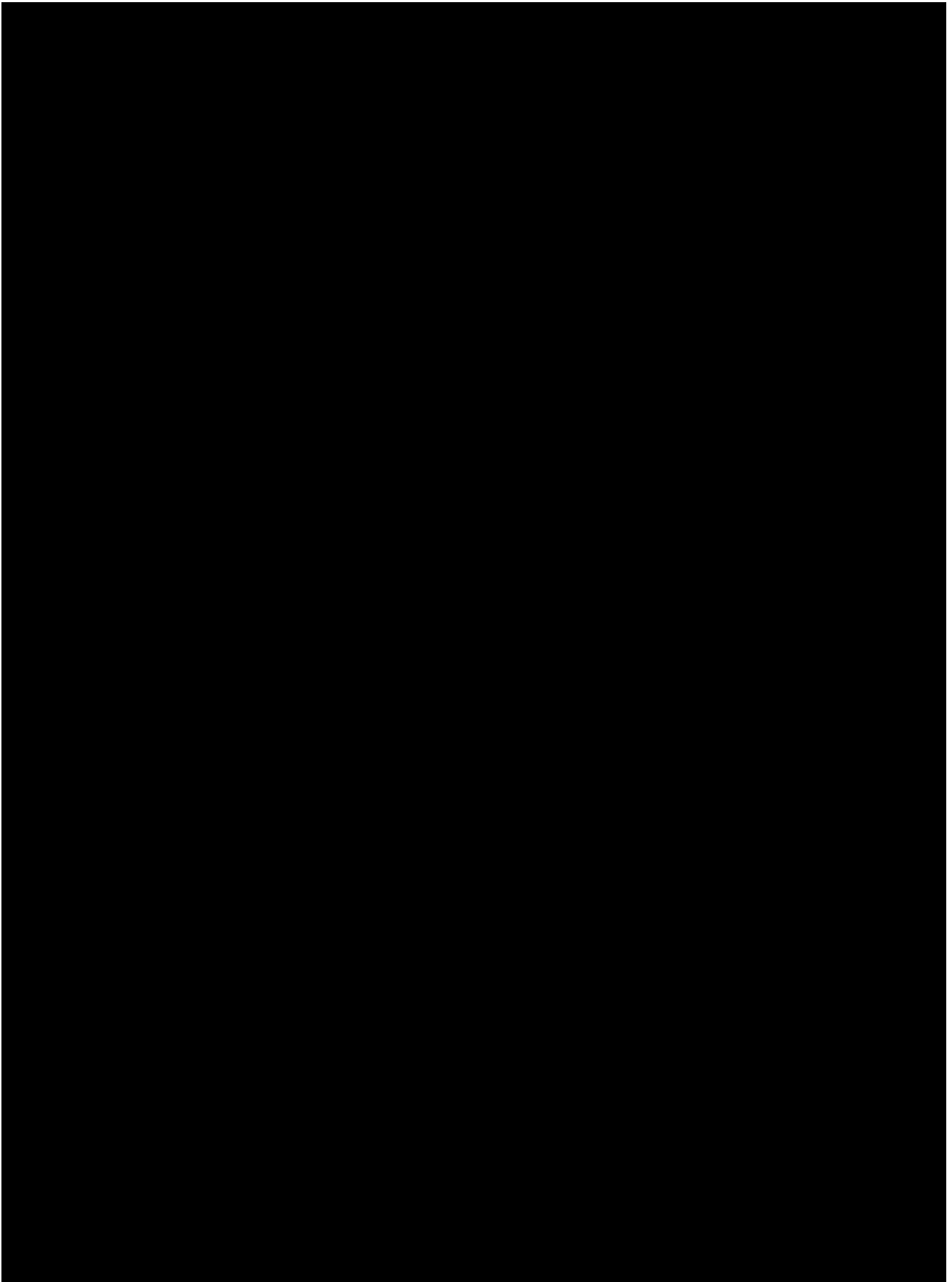
Answer: JEA has no pending proposals, as 301 Capital Partners has rejected all JEA proposals to date. JEA's prior discussions with 301 Capital Partners did not progress to a discussion of specific easements to be provided by JEA.

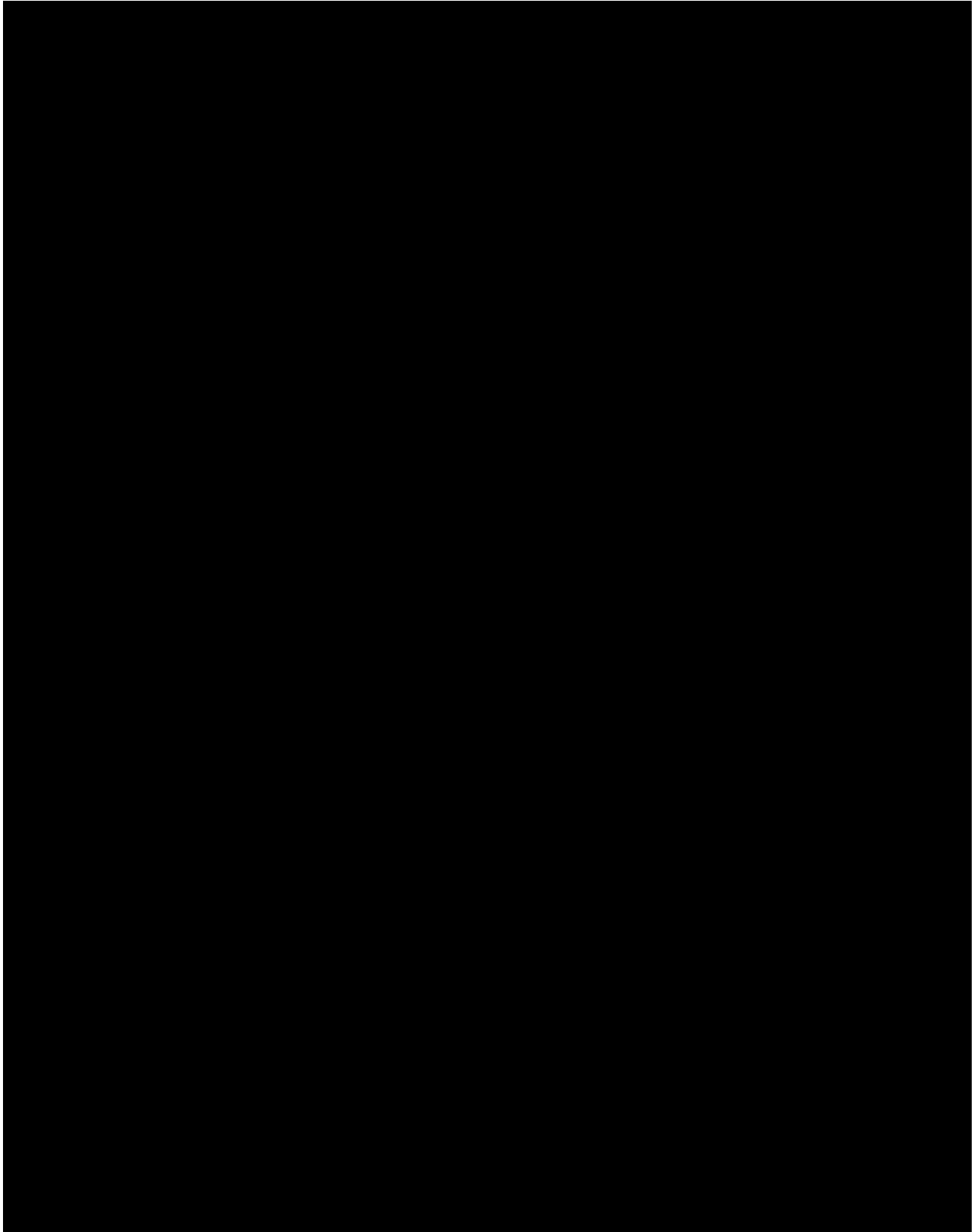
Interrogatory 78: Between the Peterson tract and the proposed FCRU service area, CSX has rail yards and rail lines. With specificity, what is JEA's projected cost for installing pipe lines under the CSX facilities?

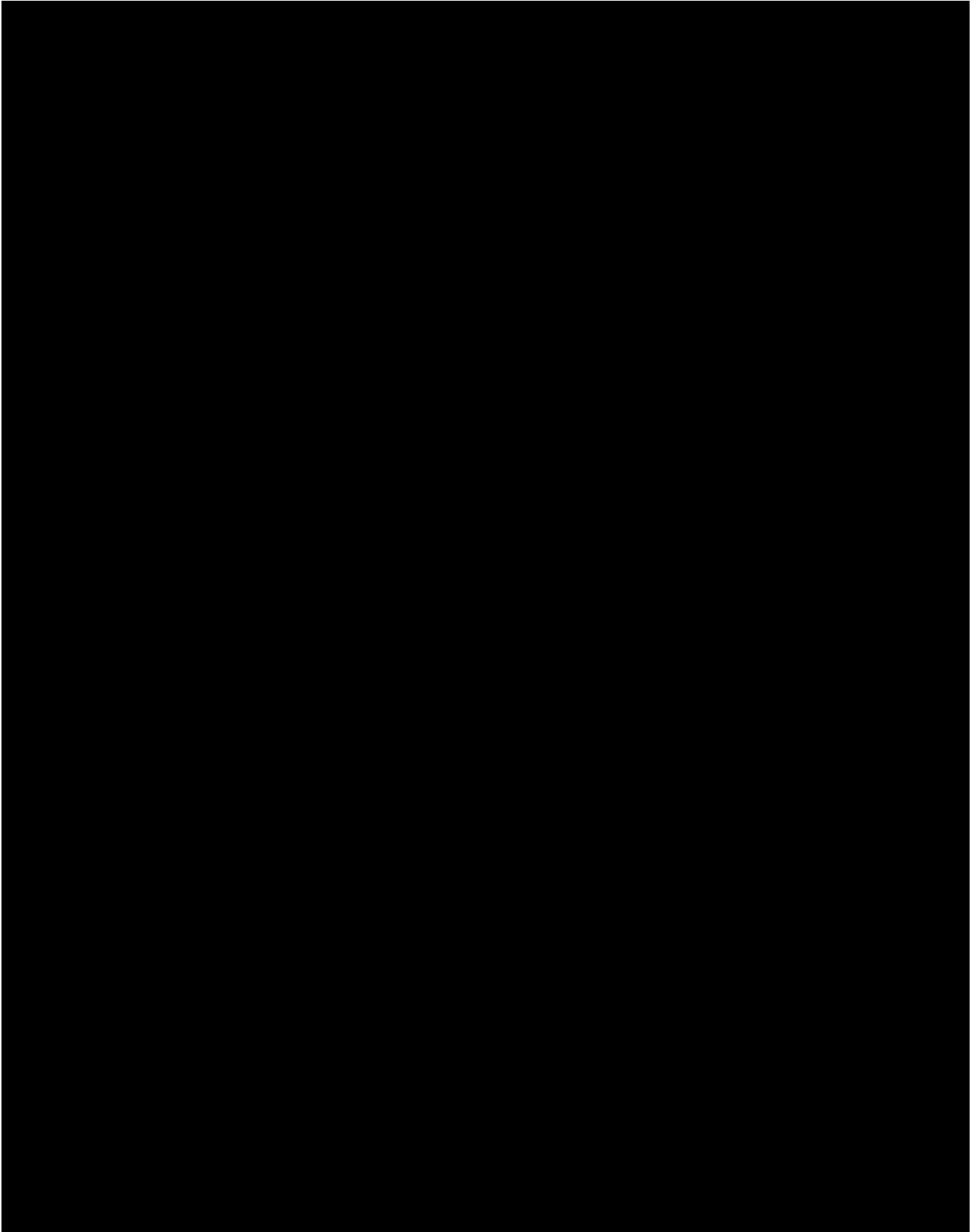
Answer: JEA has no pending proposals, as 301 Capital Partners has rejected all JEA proposals to date. JEA has no specific projection of the cost to install pipelines under CSX rail yards and rail lines.

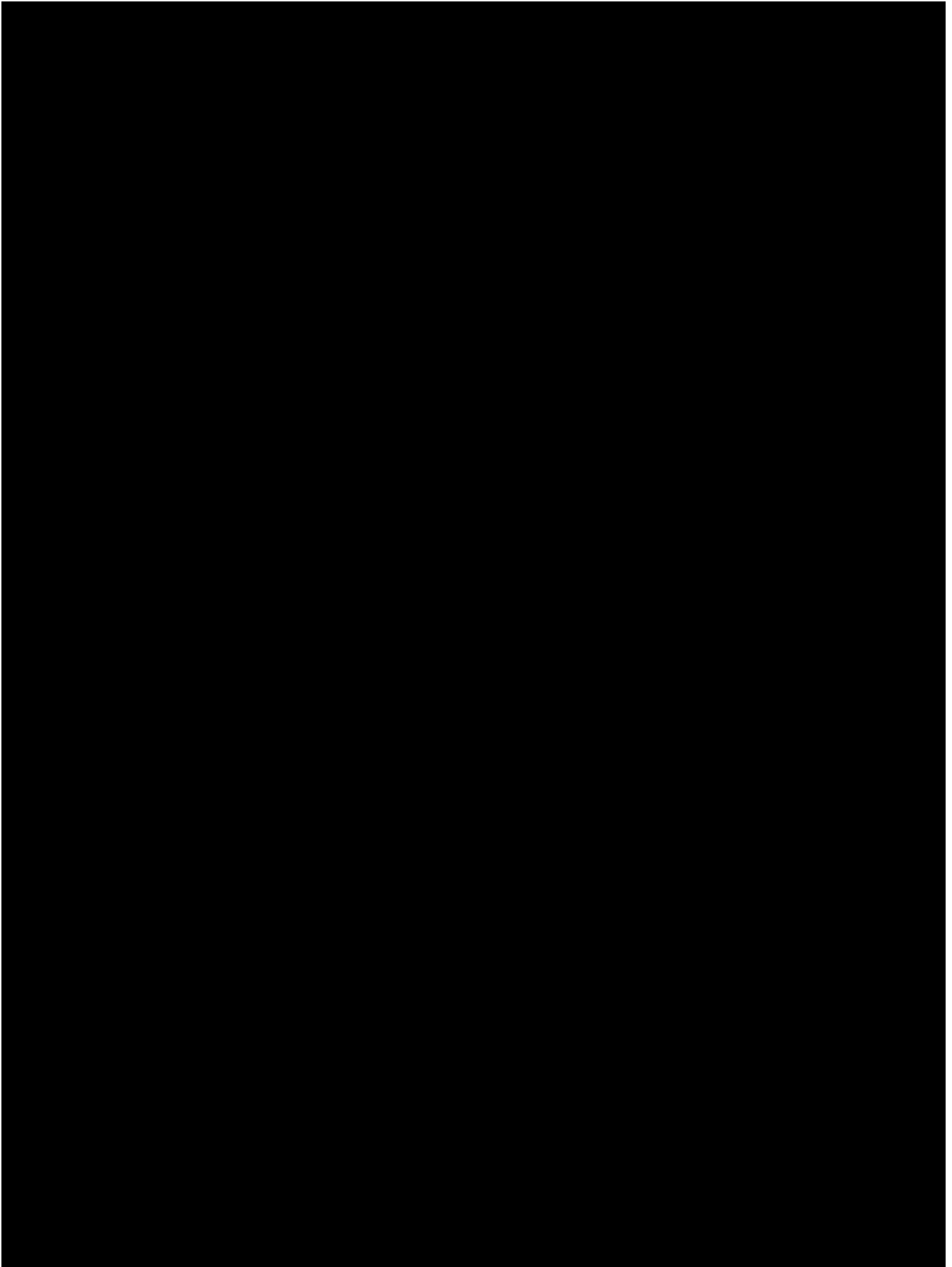


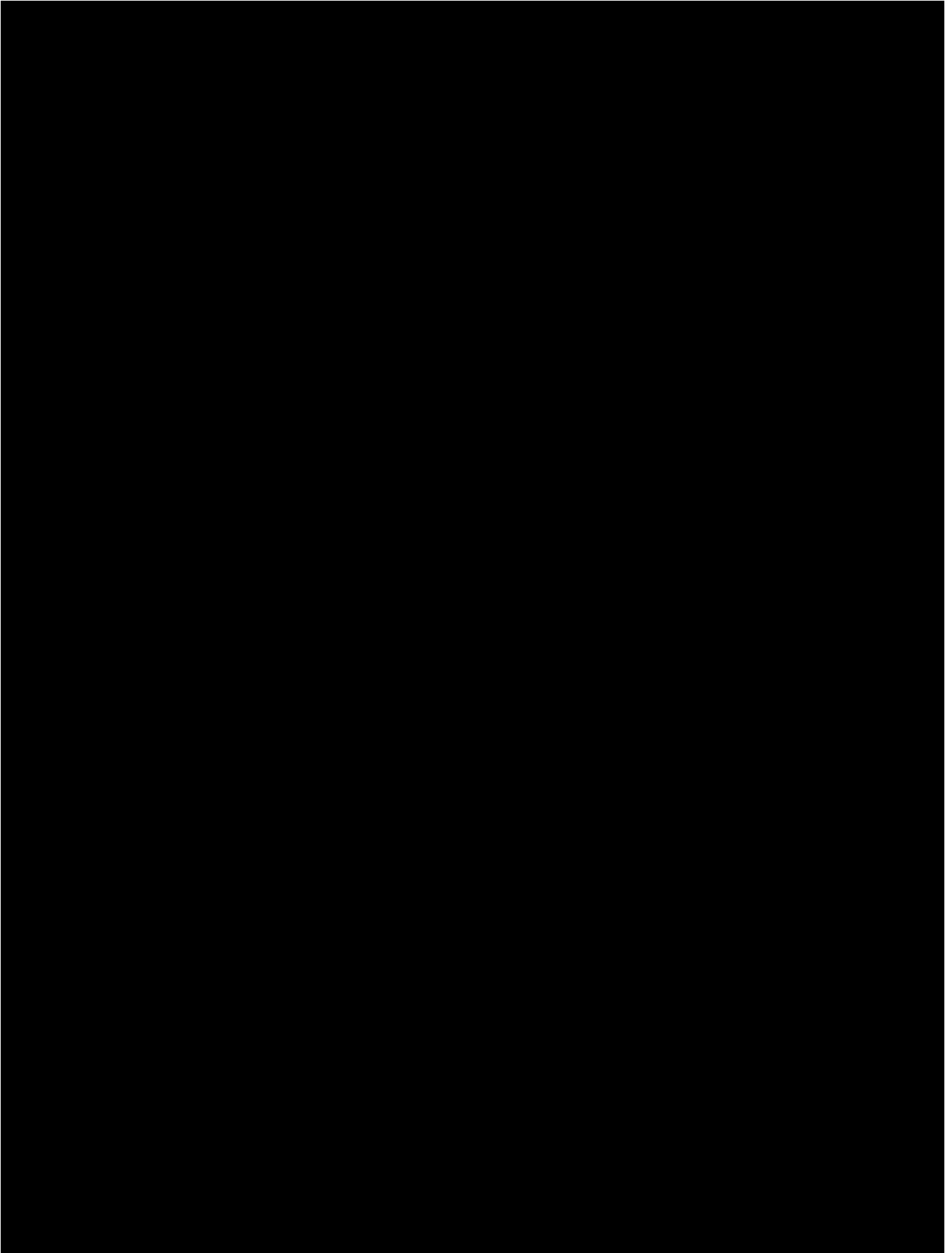


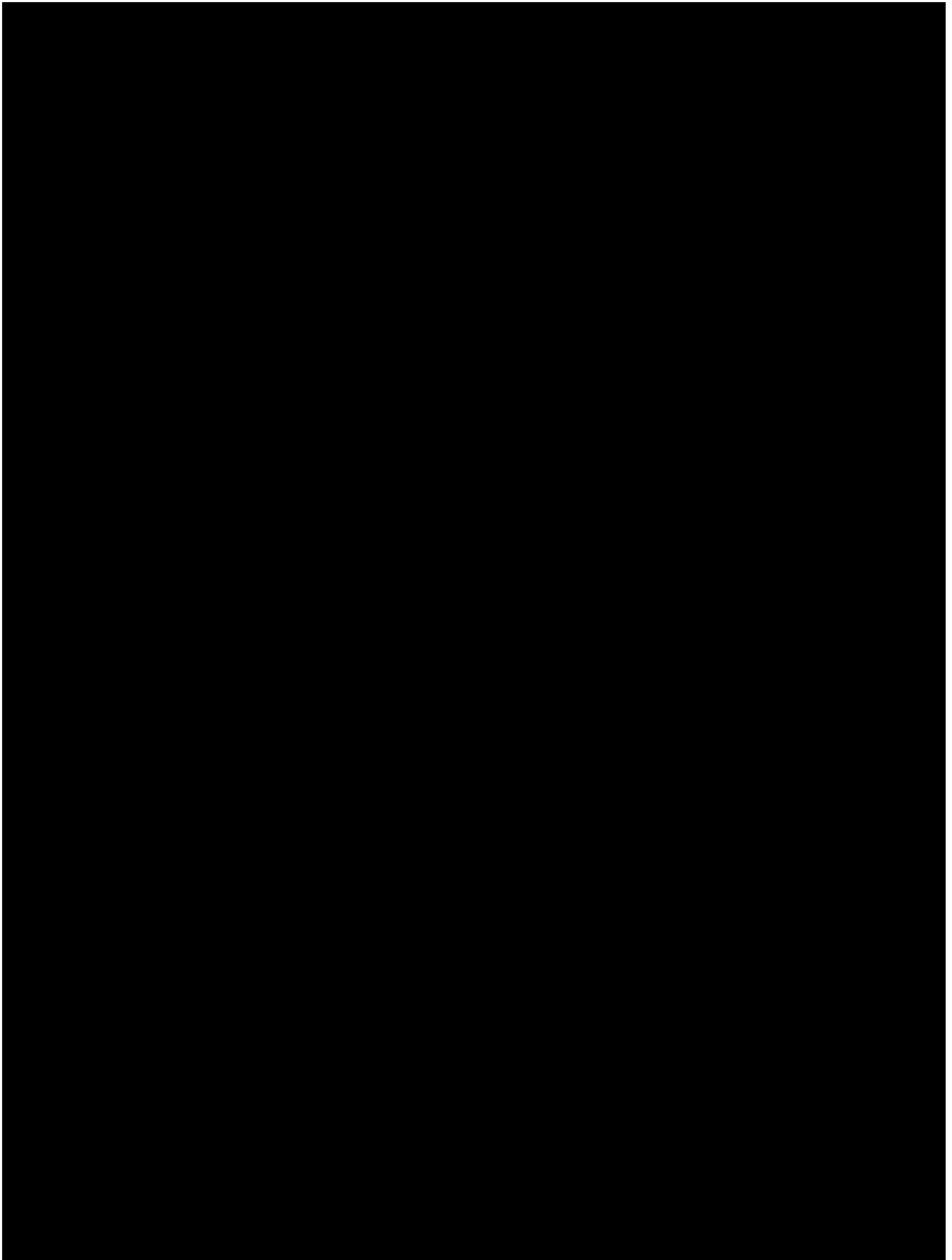


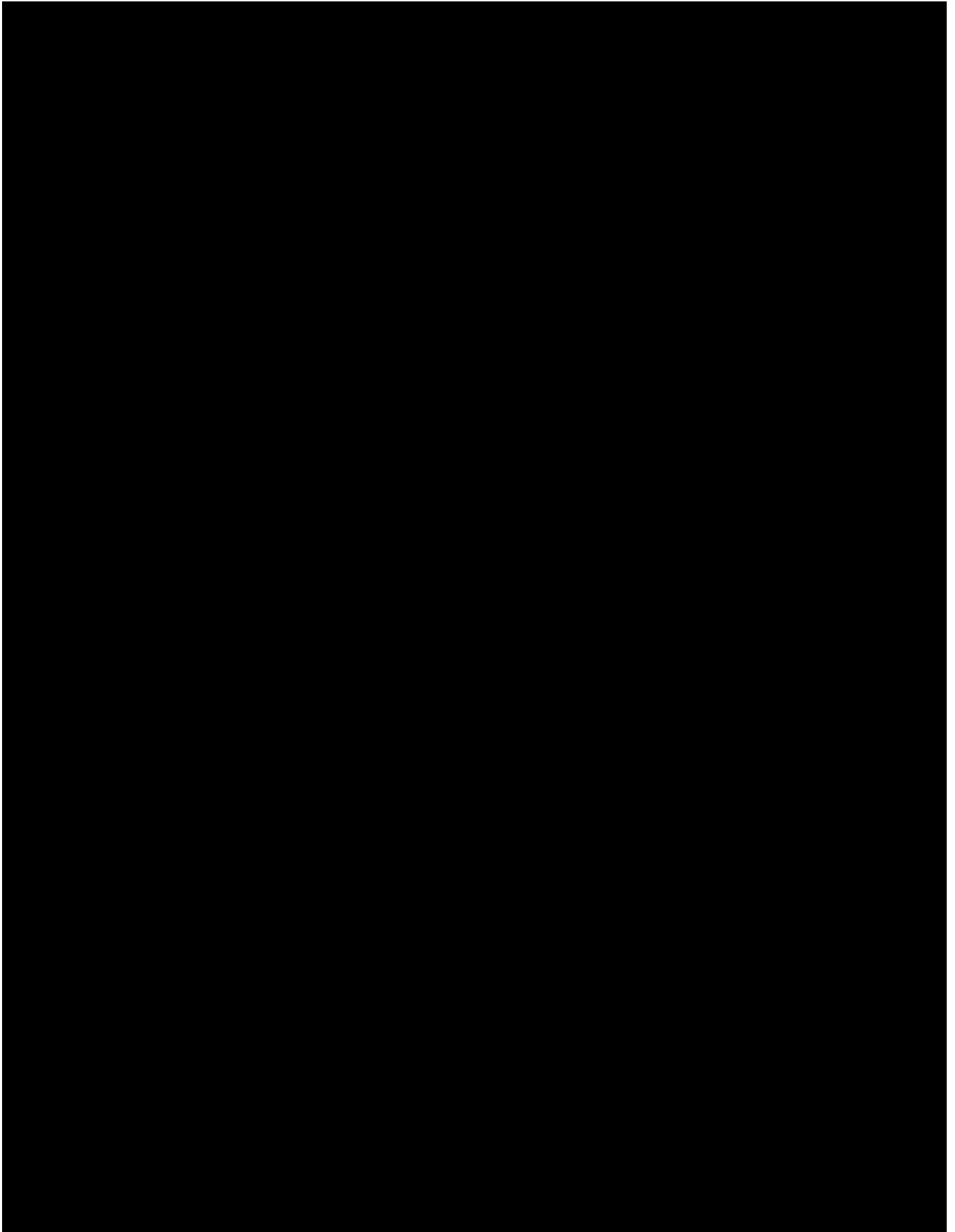








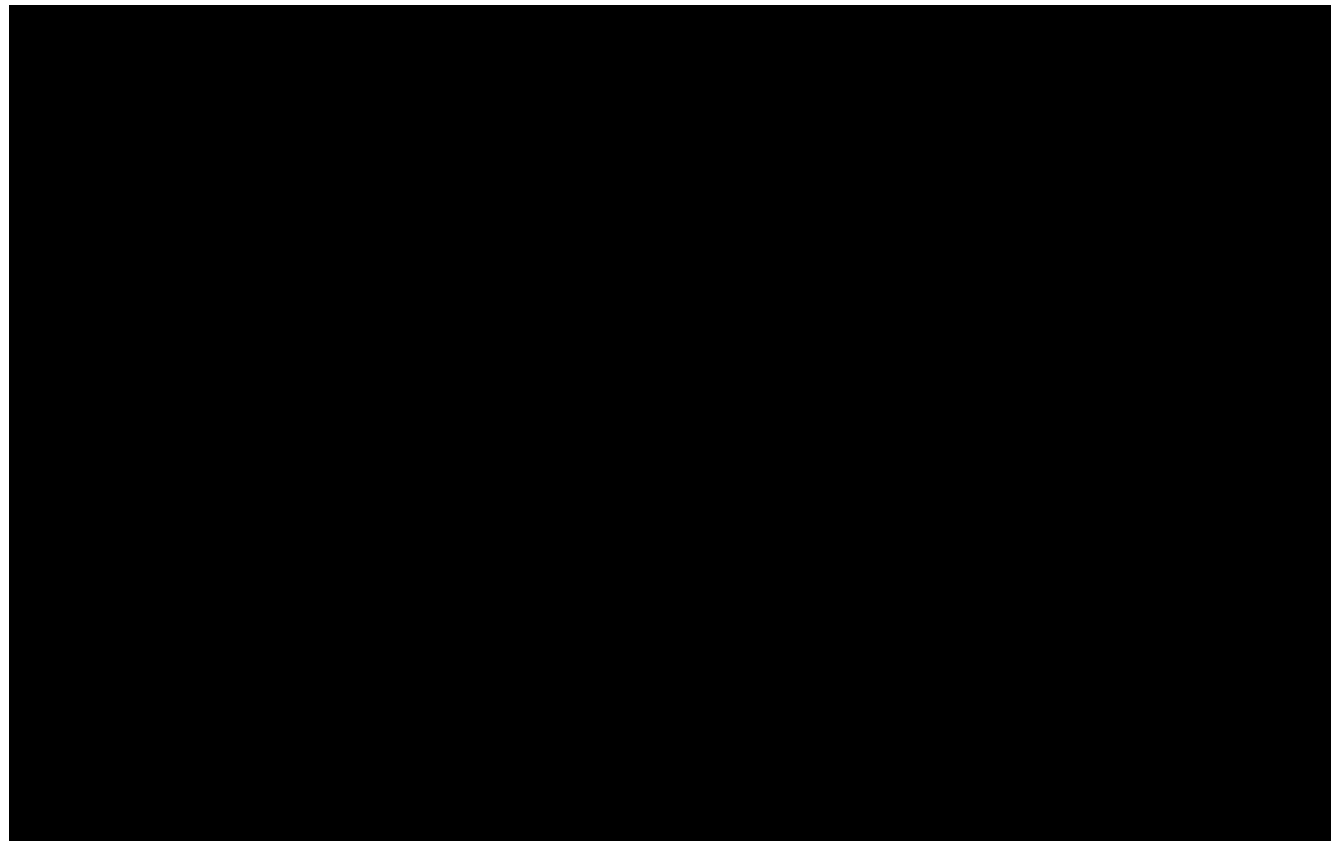


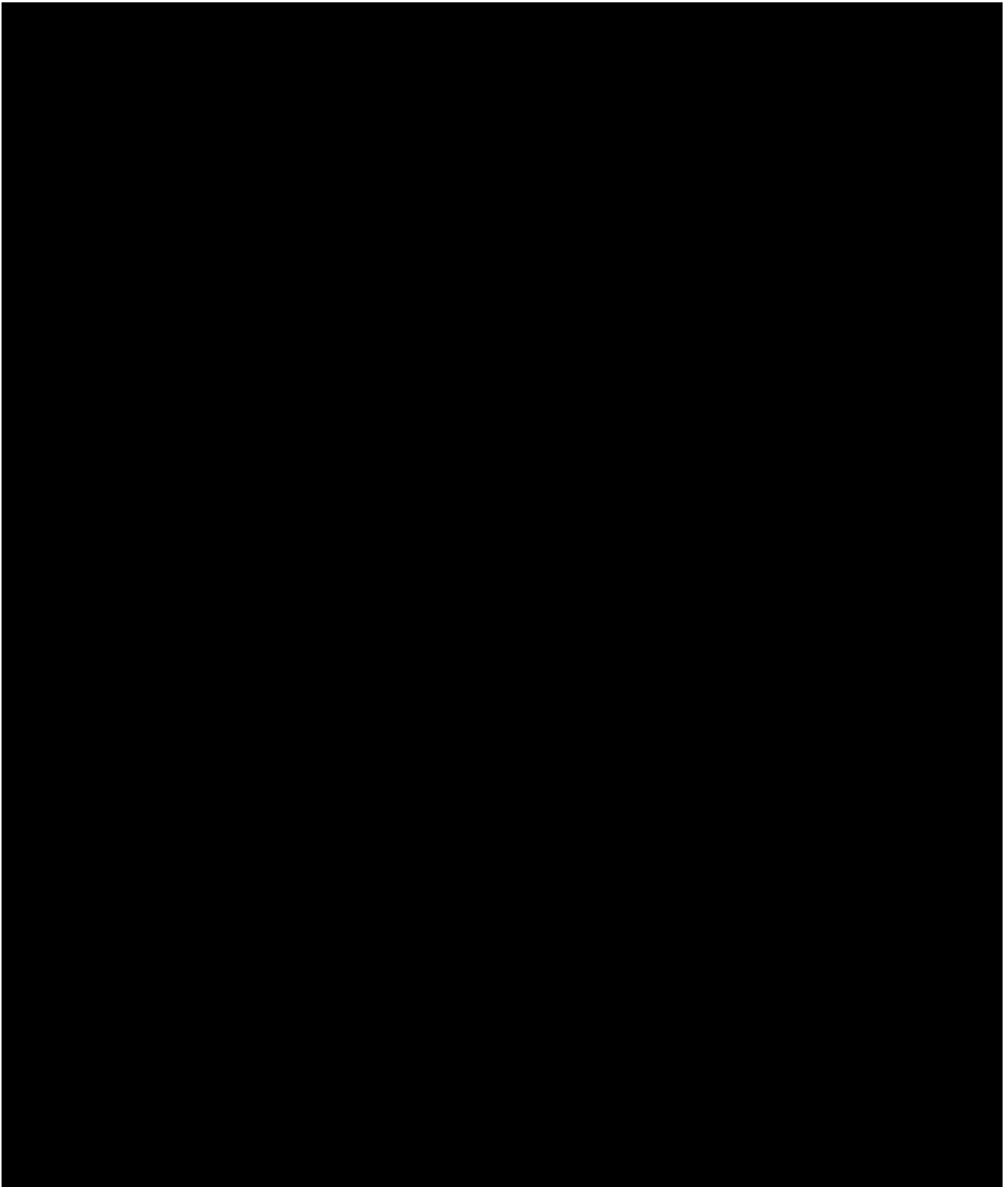




Interrogatory 105: JEA is nearing its permitted Water Use Permit capacity limits as authorized by the SJRWMD. With specificity, please advise as to how JEA intends to comply with its WUP obligations on a going forward basis.

Answer: JEA is not “nearing its permitted Water Use Permit capacity limits. . . .” JEA currently uses approximately 119 MGD of the 142 MGD allocation from the Consumptive Use Permit (“CUP”). JEA intends to continue to comply with its CUP obligations.





Interrogatory 110: One of JEA's proposals to provide water and wastewater service to 301 Capital Partners within the proposed FCRU service area is to extend the JEA's existing water

and wastewater mains. Are the existing mains and the plants from which they originate of sufficient size and capacity to accommodate 17,500 ERCs?

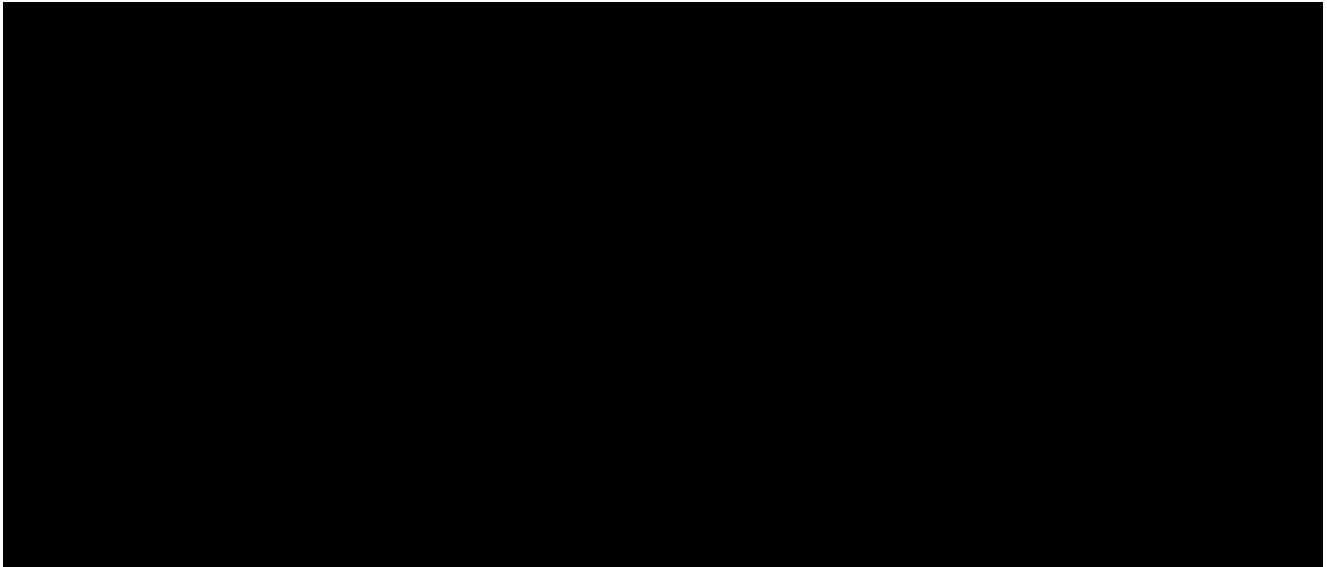
Answer: JEA has no pending proposals, as 301 Capital Partners has rejected all JEA proposals to date. JEA's prior discussions with the developer included connecting the development to JEA's existing system by extending the mains, which would accommodate approximately 3,000 ERCs. Connections beyond that number would require additional treatment facilities.

Interrogatory 111: If the existing mains and plants referenced in the previous interrogatory do not have sufficient capacity to provide service to 17,500 ERCs, how does JEA propose to provide service to the development through buildout and beyond?

Answer: JEA has no pending proposals, as 301 Capital Partners has rejected all JEA proposals to date.

Interrogatory 112: Has JEA identified in its five year Capital Plan the water and wastewater infrastructure projects needed to meet the demands of the 301 development within the proposed First Coast Service area of at least 17,500 ERCs?

Answer: No. The costs of the facilities are the developer's responsibility under the PUD Ordinance.



[remainder of page left blank, signature page to follow]

JEA

Signed By: 

Printed Name: Joseph E. Orfano

Title: Treasurer

STATE OF FLORIDA

COUNTY OF DUVAL

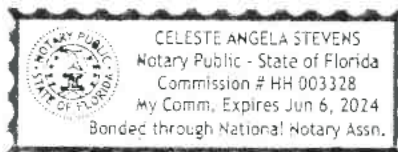
BEFORE ME, the undersigned authority, personally appeared Joseph E. Orfano as a representative of JEA, who, being duly sworn, deposes and swears that the above Answers to Interrogatories are true and correct.

SWORN TO AND SUBSCRIBED before me on this 13th day of January, 2021.



Notary Public

My Commission expires: June 6, 2024



As to objections:

/s/ Thomas A. Crabb
Thomas A. Crabb
Florida Bar No. 25846
Susan F. Clark
Florida Bar No. 179580
Radey Law Firm
301 South Bronough Street, Suite 200
Tallahassee, FL 32301
(850) 425-6654
tcrabb@radeylaw.com
sclark@radeylaw.com
Attorneys for JEA