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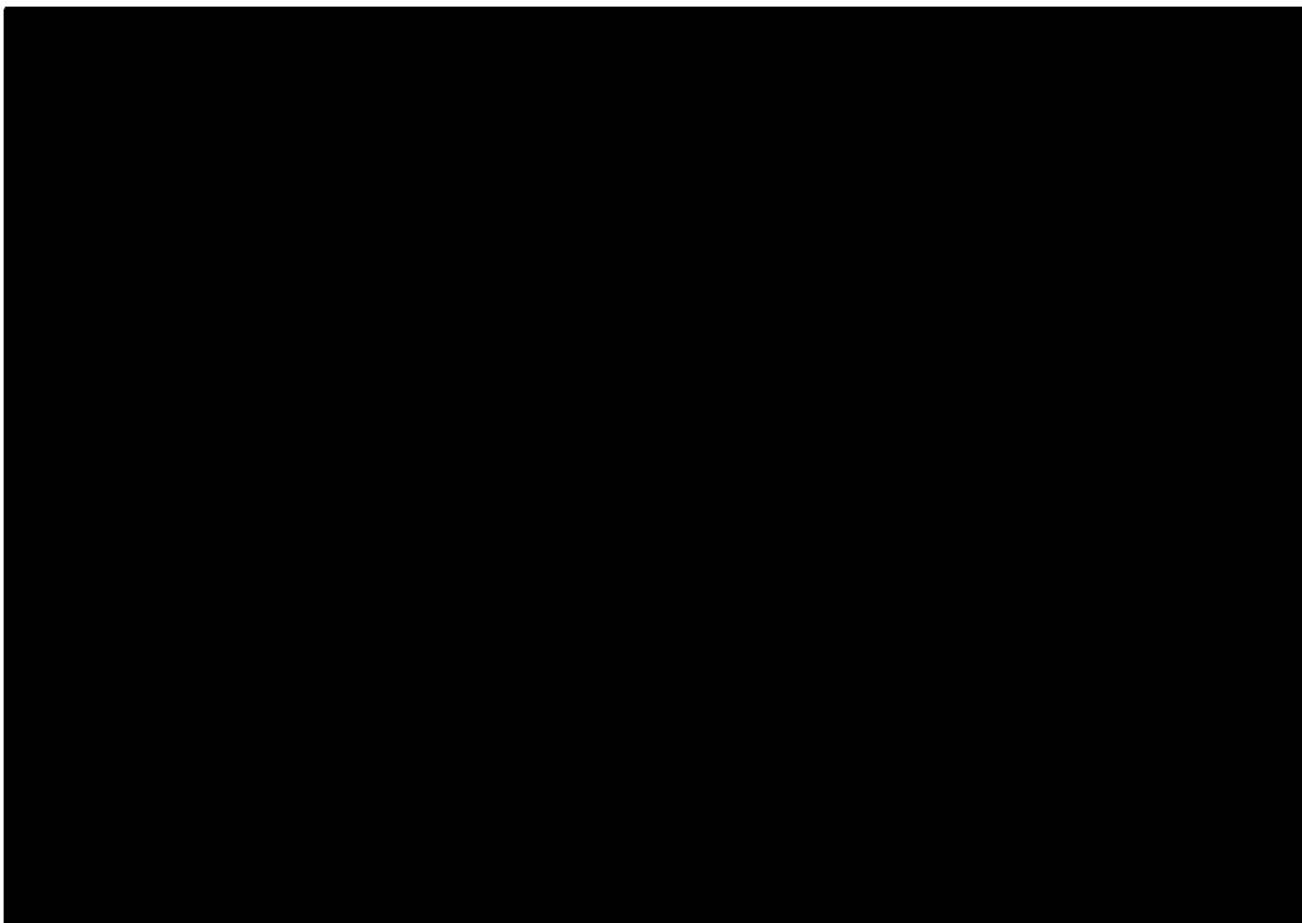
FCRU's Response to JEA's 1st
Interrogatories Nos. 5, 7, 11-12, 16, 19

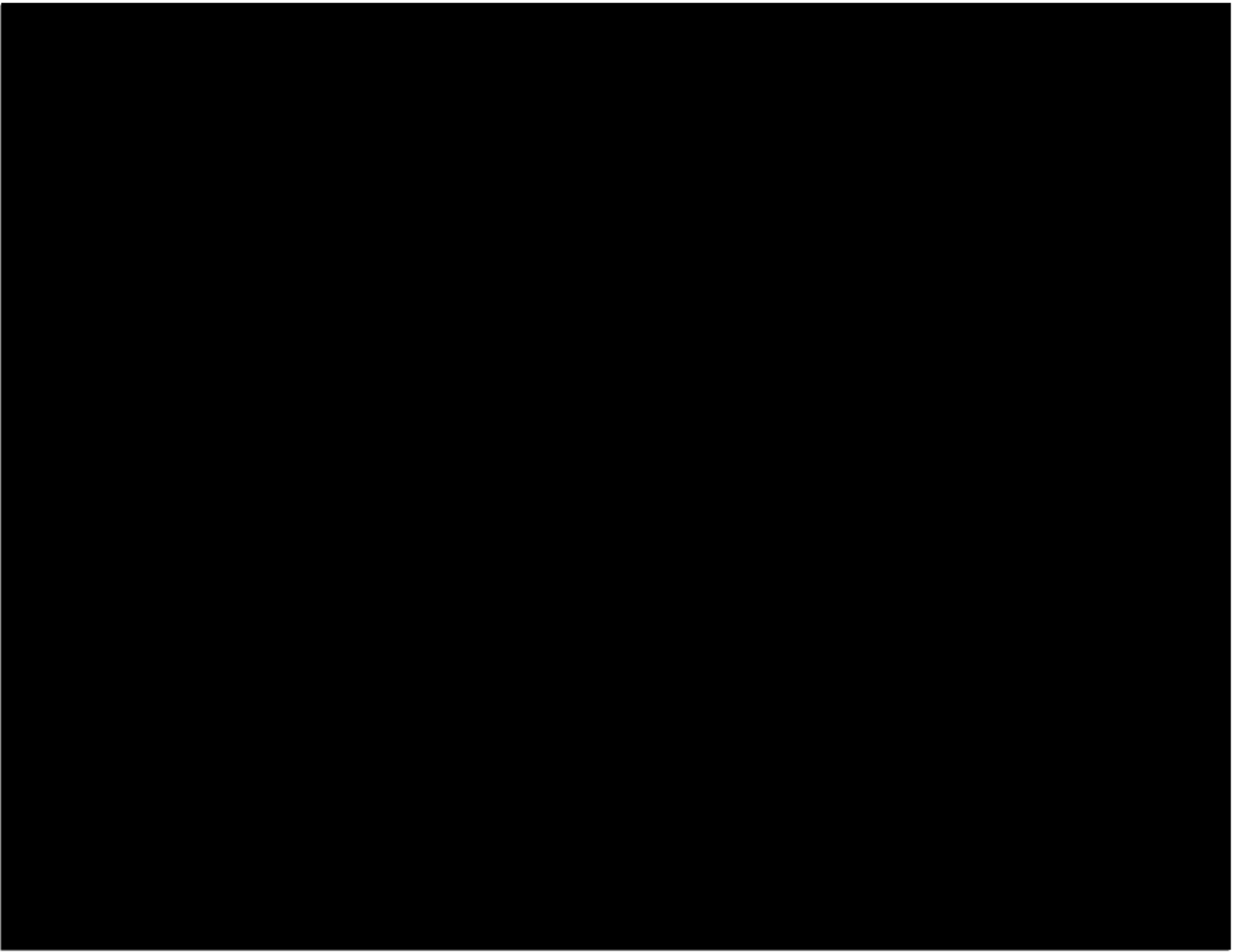
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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 1, 2020
Baker and Nassau Counties, Florida by)	
FIRST COAST REGIONAL UTILITIES,)	
INC.)	
_____)	

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

First Coast Regional Utilities, Inc. ("Applicant"), pursuant to rule 1.340, Florida Rules of Civil Procedure, responds to JEA's First Interrogatories to Applicant. submits the following interrogatories to Applicant.

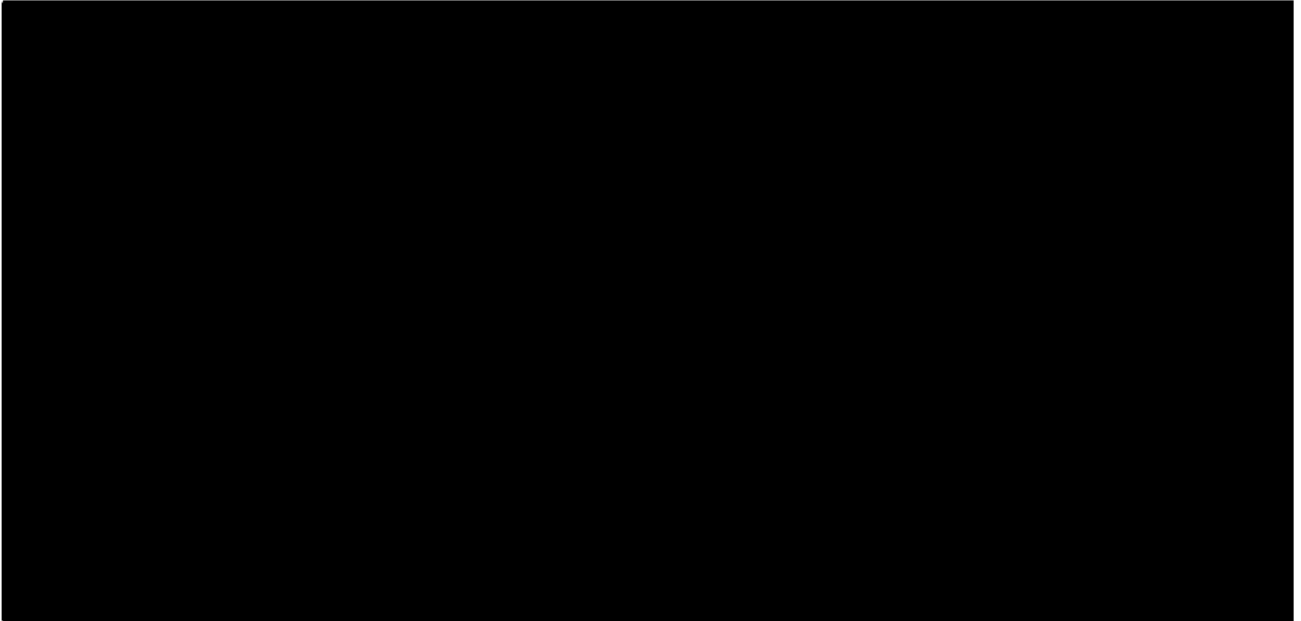




Interrogatory 5: Unless you are relying solely on the assertions made in the Application, describe your technical ability to provide service to the proposed service area.

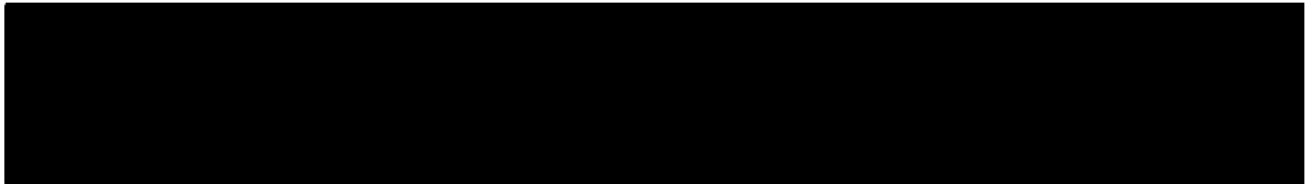
Answer: Applicant has hired Bevin A. Beaudet, P.E. as it's program manager to organize and oversee the execution of all design, construction and operation of the proposed facilities. Mr. Beaudet's credentials have been submitted under separate cover in the Pre-filed Direct Testimony submitted on May 15, 2020. Mr. Beaudet, with approval from 301 Capital Partners is in the process of selecting a highly experienced Florida registered and licensed Design/Build company to design and construct the proposed facilities. At the appropriate time, and as noted in the

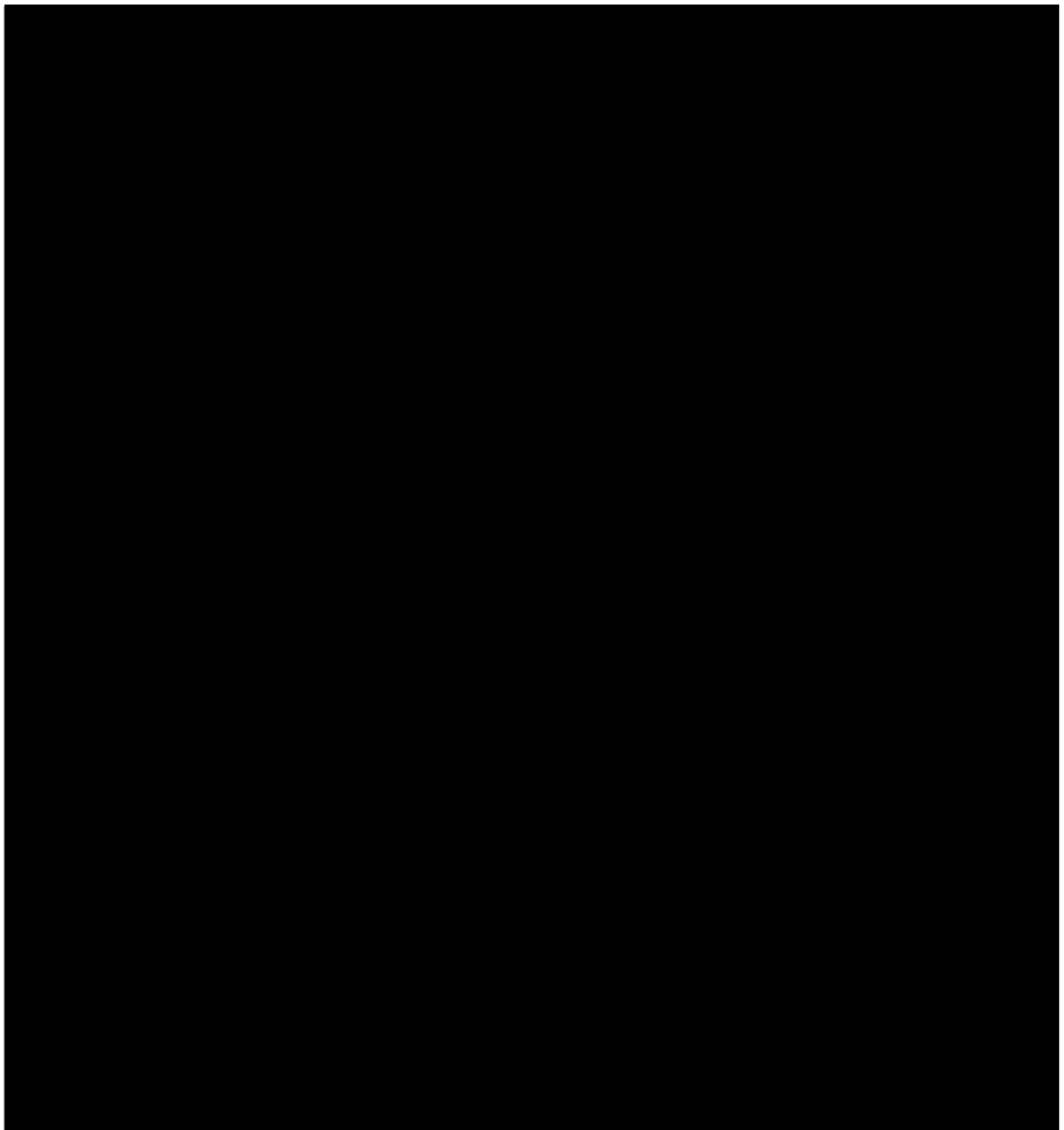
Application, Mr. Beaudet will advise the Applicant on engaging a recognized contract operations company with Florida experience to conduct operations and maintenance of the proposed facilities.



Interrogatory 7: Describe your “plans to begin serving the Development’s customers on or before January 2022” (Application, p. 3), including a timeline for construction completion and a timeline for the required regulatory and permit approvals.

Answer: The proposed initial service date of January 2022 was based on a 2 1/3 year period following the Commission’s issuance of the certificate. While the initial date of service may need to be adjusted due to the prolonged delay in the review and approval of the Application created by JEA’s objection to the application, the 2 1/3 year timeline is unchanged. The timeline requested in this interrogatory is included in the Feasibility Report attached as Exhibit “E” to the Application.



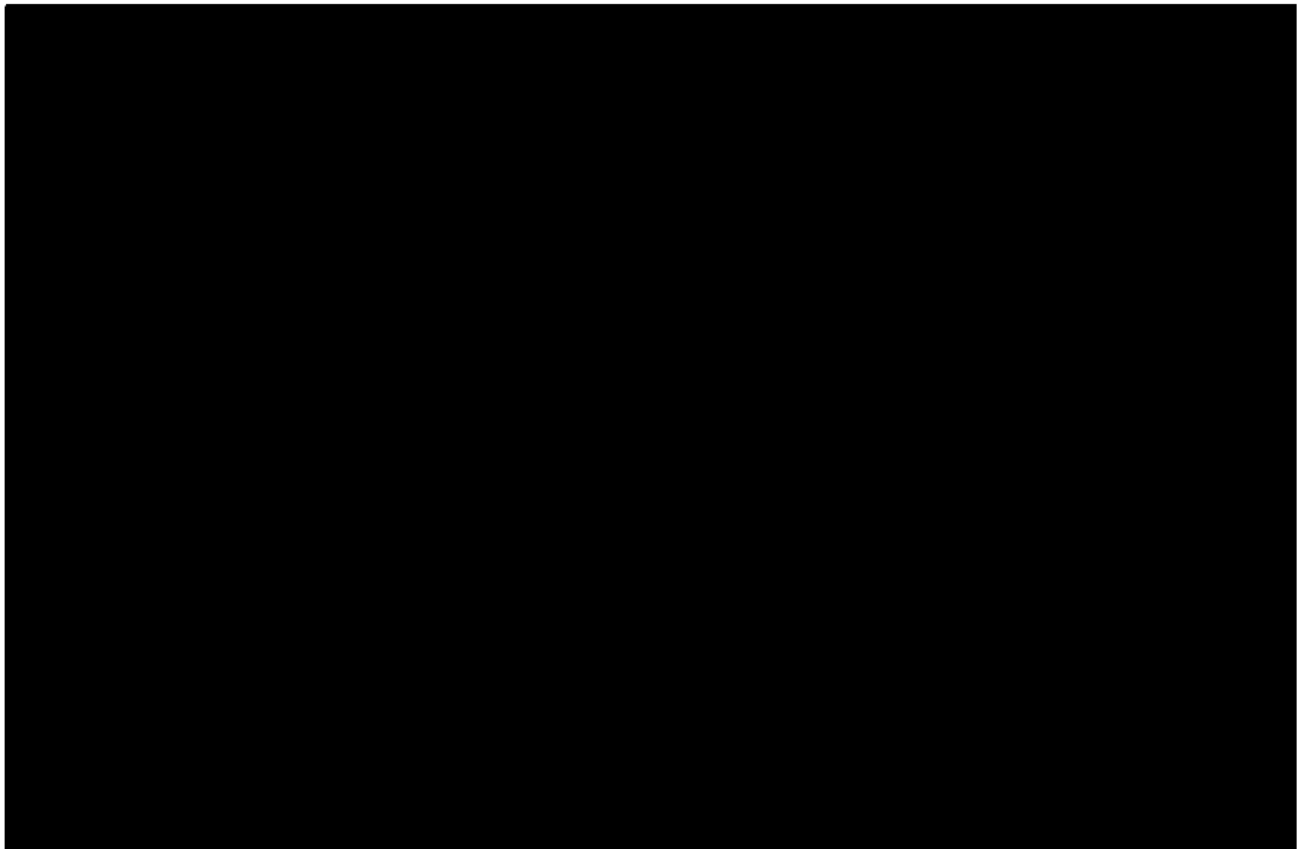


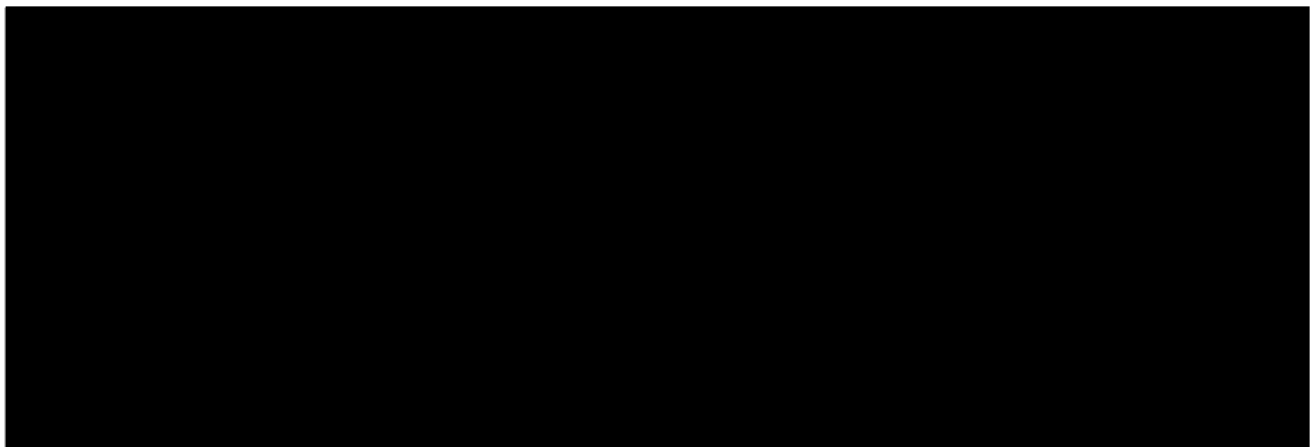
Interrogatory 11: State the factual basis for your allegation on page 7 of the Application that the proposed 50-acre site in Duval County for the water and wastewater utility has “good drainage and soil conditions.”

Answer: Soil Condition Report authored by North American Reserve, LLC for ICI Villages, LLC dated April 2010.

Interrogatory 12: Identify all persons, either presently engaged by you or proposed to be engaged by you, for the engineering, design, permitting, construction, and operation of the proposed water and wastewater utility, and the function(s) to be performed by each such person.

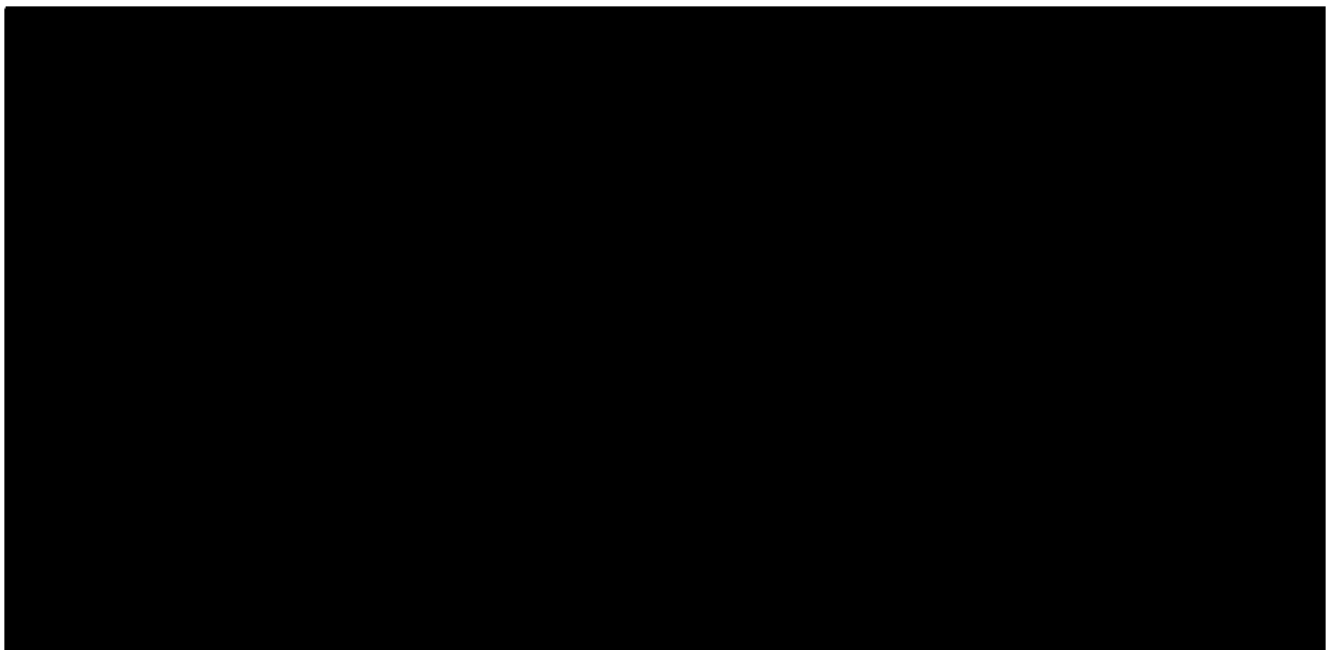
Answer: Please refer to the answer provided in response to Interrogatory No. 5. While the Design/Builder has not yet been engaged, pending resolution of this matter before the Commission, the Florida firm Globaltech Design Builders, Inc., participated in producing the Feasibility Assessment attached to the Application as Exhibit "E". Globaltech is under consideration for engagement to design, permit and construct the water and wastewater facilities.

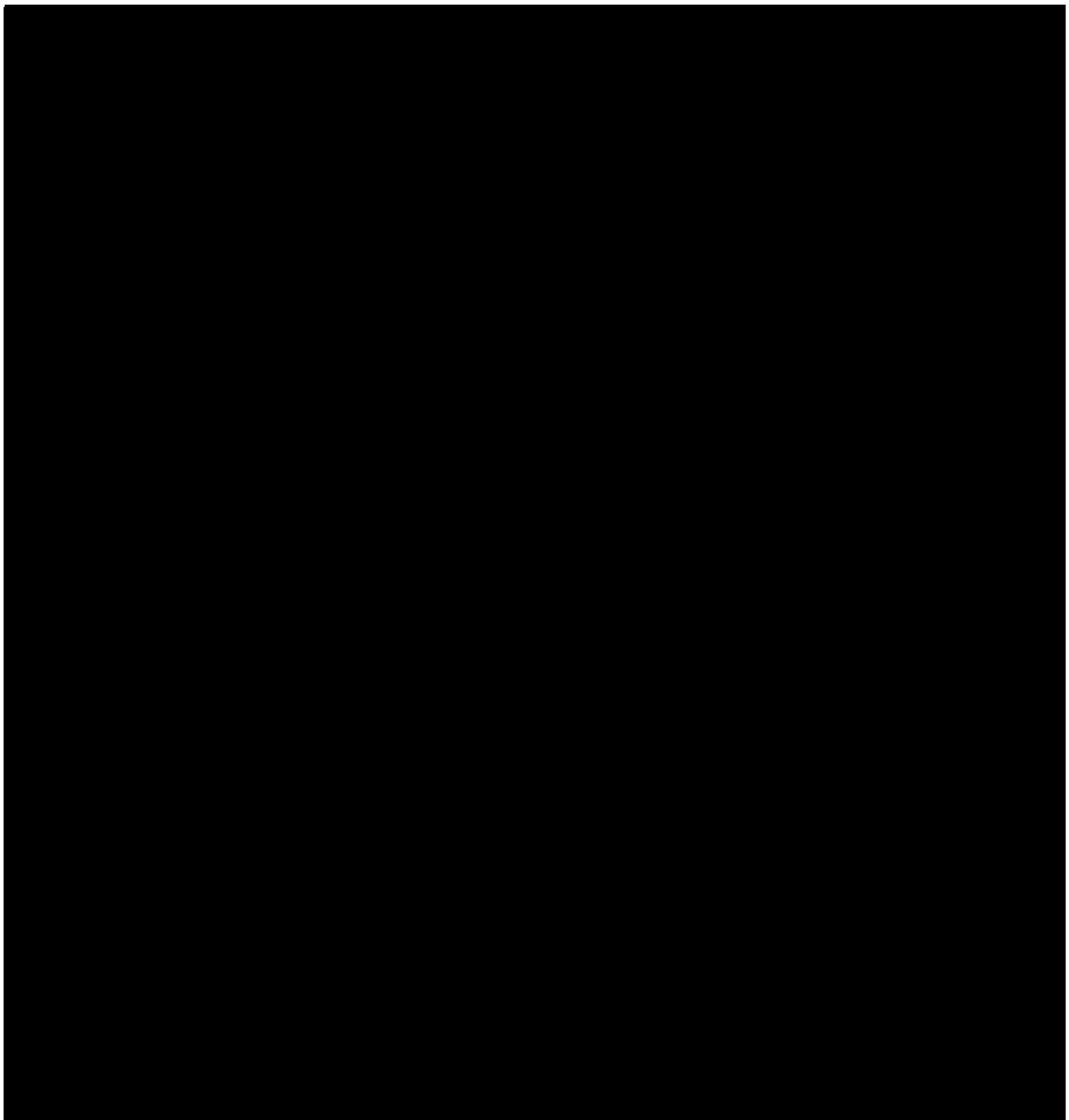




Interrogatory 16: If the COVID-19 pandemic, or changed economic conditions resulting from the pandemic, has altered any of the development plans or allegations of fact set forth in the Application, please identify them and provide revised updated plans or allegations of fact, as applicable.

Answer: Neither the COVID-19 pandemic nor any changed economic conditions has resulted in the alteration of the development plans or facts set forth in the Application. Any Alterations or delays in those plans are solely due to delays in the processing and approval of the Application.





Interrogatory 19: For each consultant, expert, witness, or other person, who files testimony on your behalf in this Docket, please identify by jurisdiction, docket number, and case name every case or matter in which they provided testimony on behalf of any business entity, individual, intervenor, association, organization or otherwise, from 2005 to the present.

Answer: Since 2005, Mr. Beaudet has presented testimony in the following matters:

1. For the Town of Burrillville, RI Sewer Commission vs. Nexom (US), Inc., AAA No. 01-18-0002-8197;

2. For Rolling Oaks Utilities, Inc., vs. Citrus County Water and Wastewater Authority Rate Case, 2018FRC-01;

3. Palm Beach County Inspector General Audit of the Village of Palm Springs, FL Public Service Department Case 216-AP-0001;

4. Palm Beach County Inspector General Contract Oversight Review of the Village of Palm Springs RFP Audit of Services Contract, Case CA-2016-0122;

Florida Department of Environmental Protection SSO Remediation Plan for the City of Riviera Beach, FL Consent Order WO-020-16.

Since 2005, Ms. Swain has presented testimony in the following matters:

1. On behalf of KW Resort Utilities Corp., before the Florida Public Service Commission, Docket No. 20170141-SU, Application for increase in wastewater rates in Monroe County by KW Resort Utilities Corp;

2. On behalf of Utilities, Inc. of Florida, before the Florida Public Service Commission, Docket No. 160101-WS, Application for increase in water and wastewater rates in Charlotte, Highlands, Lake, Lee, Marion, Orange, Pasco, Pinellas, Polk, and Seminole Counties by Utilities, Inc. of Florida;

3. On behalf of KW Resort Utilities Corp., before the Florida Public Service Commission, Docket No. 150071-SU, Application for increase in wastewater rates in Monroe County by KW Resort Utilities Corp.;

4. On behalf of Hillsborough County, before Hillsborough County, Application of Pluris PCU, Inc. for Adjustment of Water and Wastewater Service Rates.

Interrogatory 19: For each consultant, expert, witness, or other person, who files testimony on your behalf in this Docket, please identify each document upon which they relied in preparing such testimony.

Answer: Deborah Swain relied on the following documents:

- Exhibits "H" and "I" to the Application;
- Chapter 25-30, Florida Administrative Code; and
- Chapter 367, Florida Statutes.

Bevin Beaudet relied on the following documents:

- Duval County Zoning Ordinance 2010-874-E as amended and enacted on 2/11/2011;
- Arial photographs and site maps;
- Phase 1 Environmental Site Assessment, Ellis & Associates, Inc, December 2005;
- Soil Condition Report, North American Reserve, LLC for ICI Villages, LLC April 2010;
- Water and wastewater system Assessment Technical Memorandum, Jones Edwards & Associates for ICI Villages, LLC March 2007;
- April 9, 2019 Meeting Notes, containing the JEA interconnection proposal, along with JEA's proposed costs associated therewith;
- JEA Water, Sewer and Reuse Design Guideline for New Developments;
- JEA Standards Manual for Water Treatment Plants;
- Recommended Standards for Sewage Works, Latest Edition, Ten State Standards;

- Water Environment Federation Design of Water Resource Recovery Facilities, MOP 8, 6th Edition;
- FEMA flood plain maps;
- Florida Administrative Code 62-600 and 62-610.

Respectfully submitted this 1st day of June, 2020, by:

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For the Firm

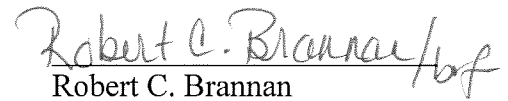
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail to the following this 1st day of June, 2020.

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