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# FCRU's Response to JEA's 1st Request for Production of Documents Nos. 6, 9-10, 15

## (including all attachments)

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

FILED: June 1, 2020

#### FIRST COAST REGIONAL UTILITIES, INC.'S RESPONSE TO JEA'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FIRST COAST REGIONAL UTILITIES, INC.

First Coast Regional Utilities, Inc. ("Applicant"), pursuant to rule 1.350, Florida Rules of

Civil Procedure, responds to JEA's First Request for Production of Documents to Applicant.

#### APPLICANT'S RESPONSES TO JEA'S SPECIFIC REQUESTS FOR PRODUCTION





**Request 6:** All documents identified in, or relied upon to draft, your answers to JEA's First Interrogatories.

### 20190168-WS Staff Hearing Exhibits 00292

**Response:** All documents non-copyright protected documents are provided other than those authored by and already in the possession of JEA.



**Request 9:** All agreements with all persons 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.

**Response:** The engagement letter for Bevin A. Beaudet, P.E. is provided. Pending approval of the Application Applicant has not engaged any person or entity for the permitting, construction and operation of the proposed water and wastewater facilities.

## 20190168-WS Staff Hearing Exhibits 00293

**Request 10:** All permits issued to you by the Florida Department of Environmental Protection or any water management district.

**Response:** Pursuant to Section 367.031, Florida Statutes, neither the Florida Department of Environmental Protection nor the water management district are permitted to issue permits for the utility until the Commission issues a certificate to Applicant. No documents are responsive to this request.





**Request 15:** For each consultant, expert, witness, or other person, who files testimony on your behalf in this Docket, all documents upon which they relied in preparing such testimony.

**Response:** Non-copyright protected documents will be provided other than those authored by and already in the possession of JEA.



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

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By: Robert C. Brannay Robert C. Brannan 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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