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FCRU's Response to JEA's 2<sup>nd</sup> Request  
for Production of Documents Nos. 17, 23-24

(including all attachments)

**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: October 9, 2020
Baker and Nassau Counties, Florida by	)	
FIRST COAST REGIONAL UTILITIES,	)	
INC.	)	
_____	)	

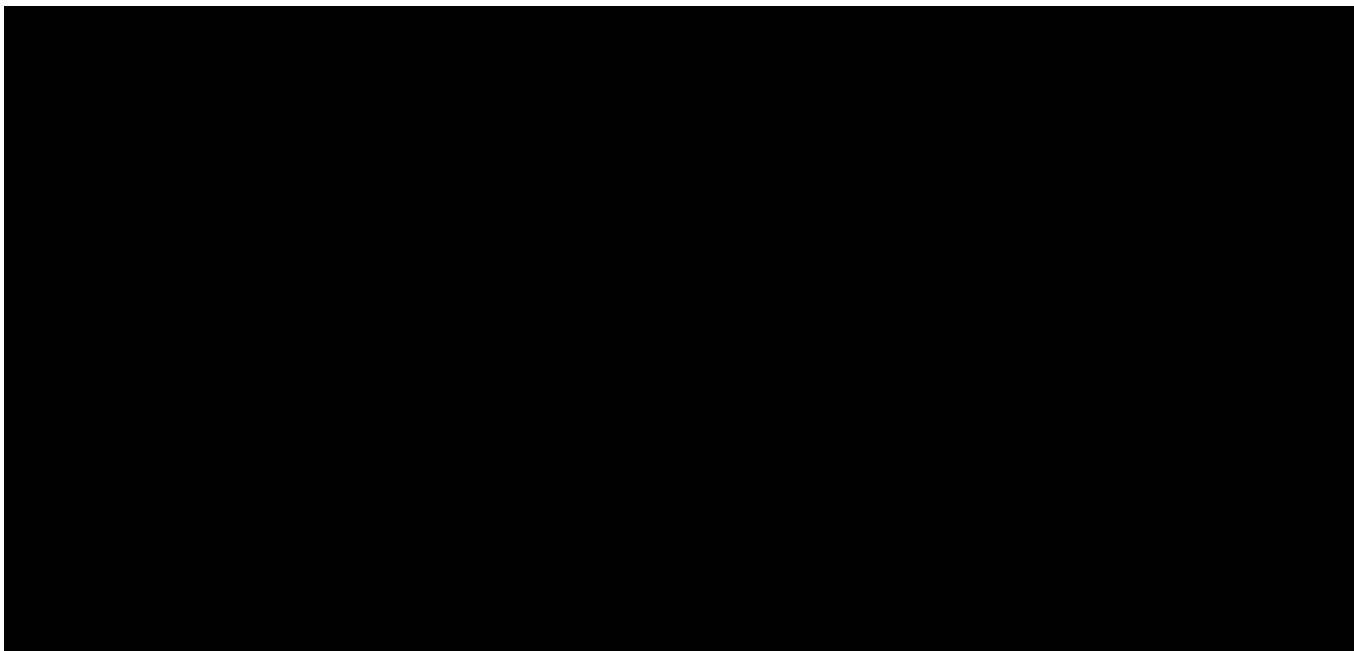
**FCRU'S RESPONSE TO**  
**JEA'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**  
**TO FIRST COAST REGIONAL UTILITIES, INC. (REQUESTS 17-27)**

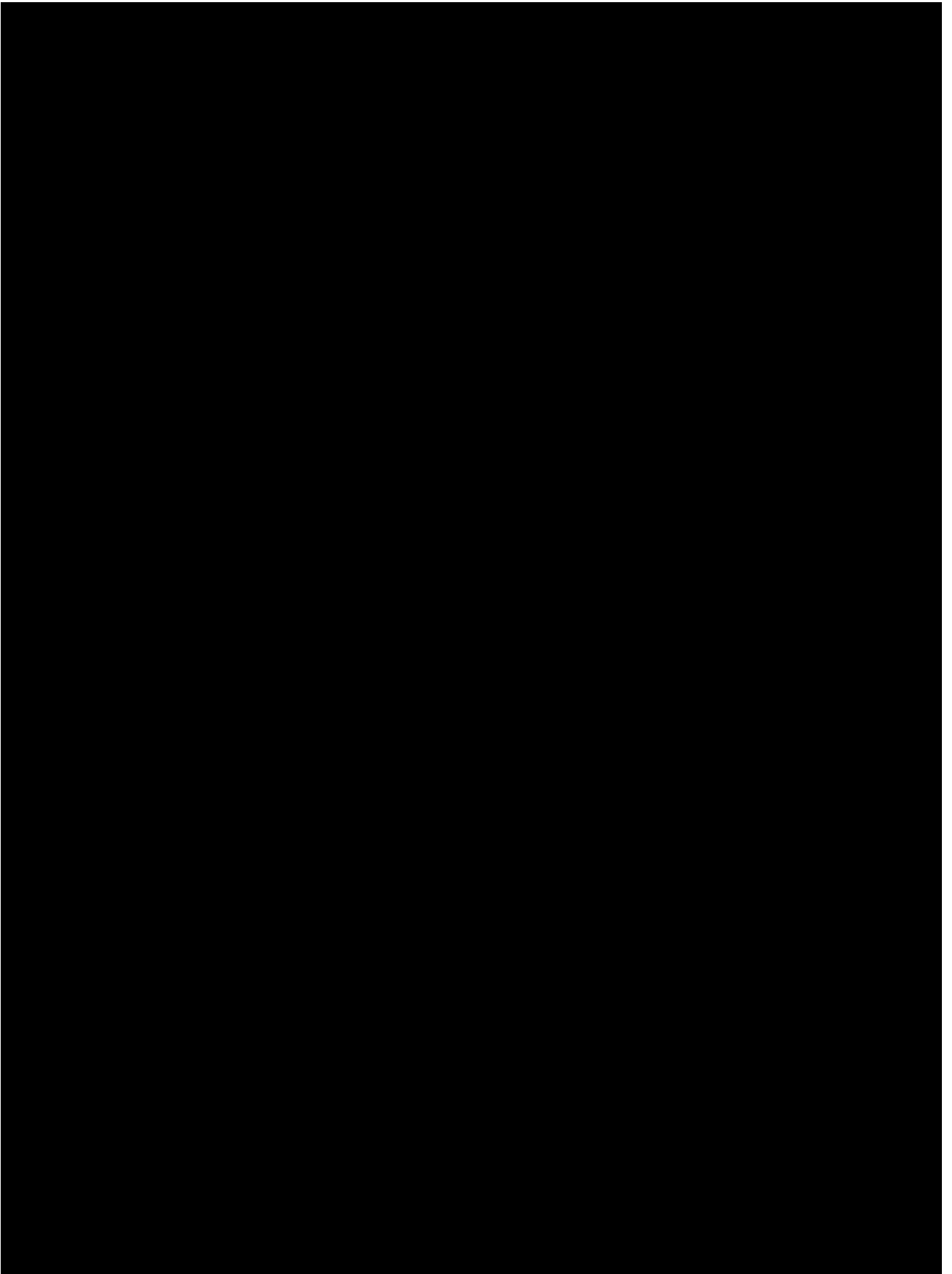
First Coast Regional Utilities, Inc. ("Applicant" or "First Coast"), pursuant to Rule 1.350, Florida Rules of Civil Procedure, responds to JEA's Second Request for Production of Documents to Applicant.

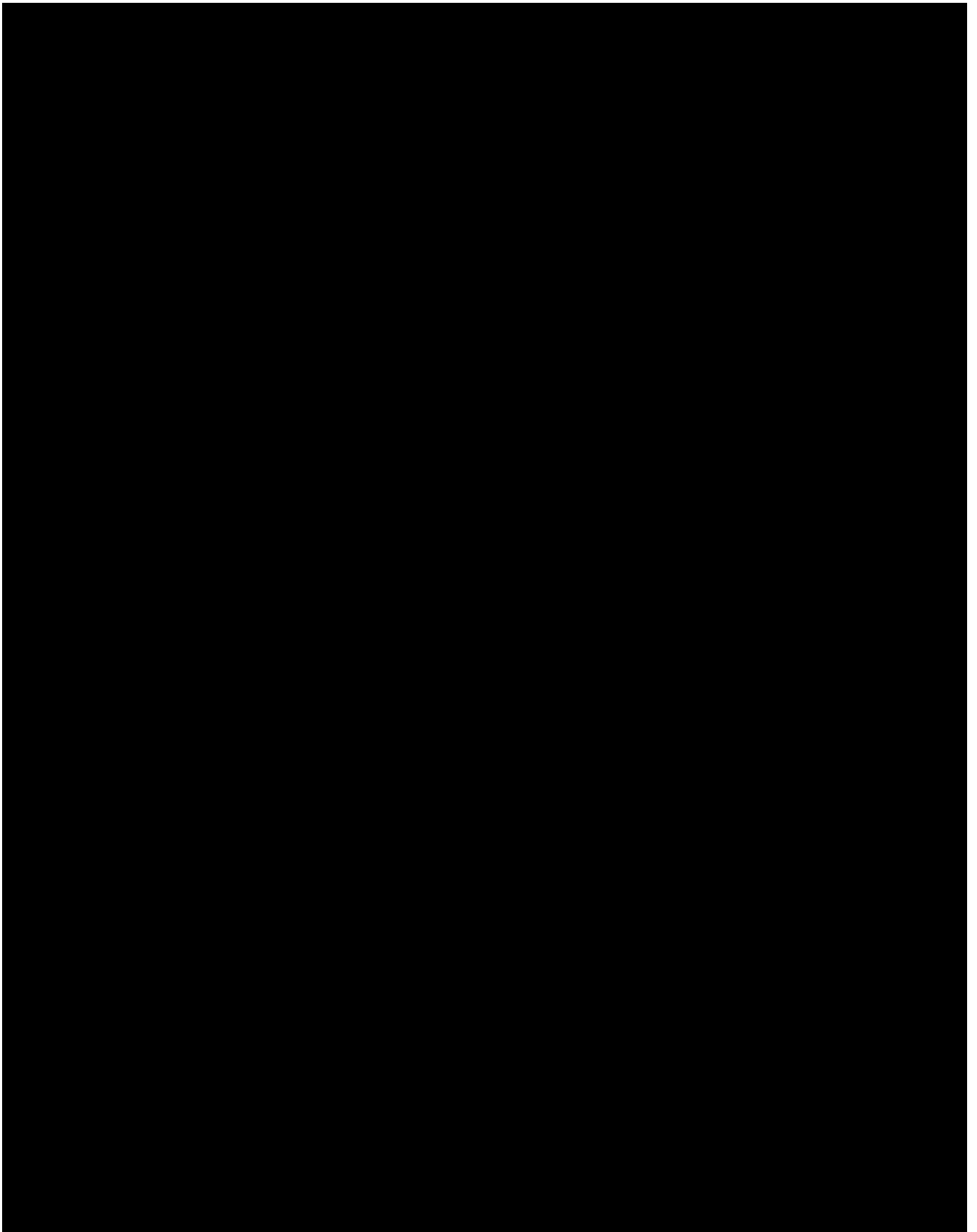
**APPLICANT'S RESPONSES TO JEA'S**  
**SPECIFIC REQUESTS FOR PRODUCTION**

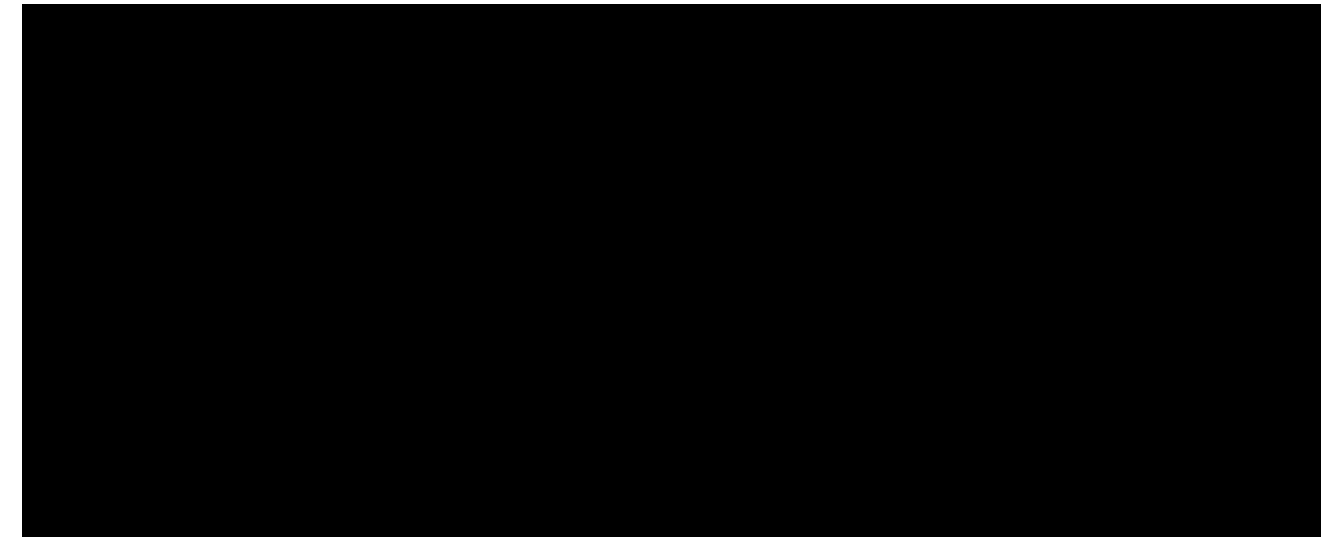
17. Any documents, notes, or other papers from the April 9, 2019 meeting referenced on page 6, lines 7-8 of the Kennelly Rebuttal Testimony.

*Response:* Those documents are being produced.









23. Any and all documents, papers, or notes referred to by Mr. Kelly regarding JEA's Consumptive Use Permit, as discussed at page 4, lines 15-18 of the Kelly Rebuttal Testimony.

*Response:* Materials responsive to this Request are:

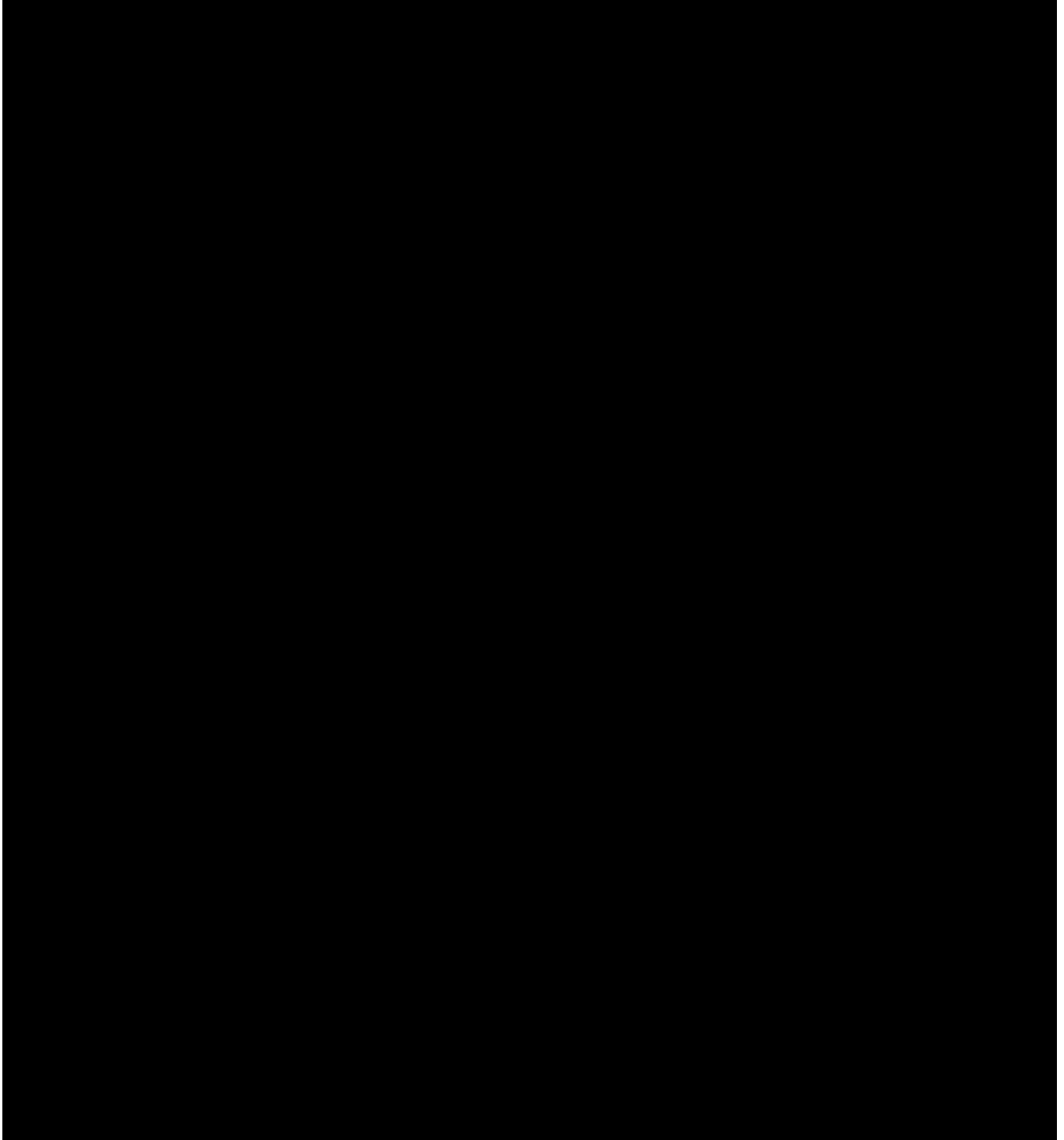
- SJRWMD JEA CUP 88271 (Latest version 88271-18 is produced); and Management Presentation Project Scampi December 2019 (produced in response to Request #22).

24. Any and all documents upon which Mr. Kelly relied for his discussion of JEA's Agreement with FDEP on page 6, lines 4-7 of the Kelly Rebuttal Testimony.

*Response:* Materials responsive to this Request contain documents from JEA's website and are freely available to JEA. Accordingly, FCRU will identify the materials with sufficient detail for JEA to retrieve the materials from its website or note that the materials are being produced.

- Fourth Amendment to Consent Order between JEA and Florida Department of Environmental Protection executed July 10 (This should include reference to all earlier amendments including exhibits);

- September 22, 2020, presentation at JEA Board of Directors Meeting on Water/Wastewater Resiliency Update including video of presentation; and
- Management Presentation Project Scampi December 2019 (produced in response to Request #22).



Respectfully submitted this 9th day of October, 2020.

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