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January 18, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

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01 JAN 18 PM 2:53
RECORDS AND REPORTING

Re: Docket No. 990696-WS

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket is the original and fifteen copies of JEA's Objections to St. Johns County's First Request for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely,

J. Stephen Menton
J. Stephen Menton

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FPSC-BUREAU OF RECORDS

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CMP cc: Counsel of Record
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DOCUMENT NUMBER-DATE

00765 JAN 18 01

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for original)
certificates to operate water) Docket No. 990696-WS
and wastewater utility in Duval)
and St. Johns Counties by)
Nocatee Utility Corporation.)
_____)

In re: Application for certificates)
to operate a water and wastewater) Docket No. 992040-WS
utility in Duval and St. Johns)
Counties by Intercoastal Utilities,)
Inc.) Filed: January 18, 2001
_____)

**JEA'S OBJECTIONS TO ST. JOHN COUNTY'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS TO JEA**

JEA, by and through its undersigned counsel, and pursuant to Order No. PSC-99-1764-PCO-WS, issued September 9, 1999, Rule 28-106.206, Florida Administrative Code, and Rule 1.280, Florida Rules of Civil Procedure, files its objections to St. Johns County's First Request for Production of Documents served on JEA on January 4, 2000. JEA's objections are as follows:

1. Request for Production of Documents Number 1 states:
 1. Please provide copies of all Developer Agreements that JEA has entered into within the last twelve (12) months for developments located both within and outside of Duval County.

JEA objects to this document production request on the grounds that it is vague. In addition, depending on the interpretation of the term "Developer Agreements," the request is potentially overbroad and unduly burdensome. Subject to and without waiving its objections, JEA will produce responsive documents. Counsel for JEA and St. Johns County have conferred regarding this discovery request and believe they will be able to work out a mutually acceptable resolution. A copy

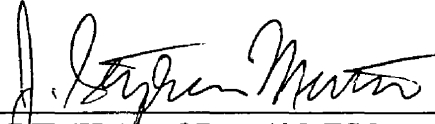
DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

of two Developer Agreements will be available for review in Tallahassee. In addition, JEA will make available for review and copying at a mutually agreeable time in Jacksonville voluminous records that may contain additional responsive documents. If a problem arises with respect to these arrangements, the parties will notify staff that a ruling on the objections is necessary.

Respectfully submitted,



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AND

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was furnished by U.S. Mail to the following
this 14 day of January, 2001:

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By: 
J. STEPHEN MENTON, ESQ.

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