

EXHIBIT NO. 70

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WITNESS: Bevin A. Beaudet

PARTY: First Coast Regional Utilities, Inc.

DESCRIPTION: August 9, 2019 Letter to Paul Harden (JEA Onsite Proposal)
(JEA_002122-002124)

PROFFERED BY: JEA

August 9, 2019

Paul Harden
Attorney at Law
501 Riverside Avenue, Suite 901
Jacksonville, Florida 32202

Re: 301 Partners Franchise Proposal

Mr. Harden,

JEA has reviewed the proposed Memorandum of Understanding (MOU) in regards to the offered 301 franchise proposal. JEA is not comfortable with a private franchise under the conditions set in the MOU. The proposed language is inconsistent with the previously approved PUD language which was approved by the City of Jacksonville (Ordinance 2010-874).

JEA would like to propose the draft terms for the proposed 301 development. The Draft Terms attached in table format are intended to achieve the following objectives:

- Honor the approved PUD language (Ordinance 2010-874).
- Avoid JEA acceptance of private development risk "pledging of credit" (prohibited under Florida Constitution Art. VII S. 10) while allowing for system expansion in unserved territory.
- Appropriately allocate project costs and risks.
- Allow for long-term objectives and reliability of connecting the project in to existing and planned JEA facilities.
- Provide consistent utility service to customers from project commencement while consolidating electric/water/sewer billing or service providers.
- Clarify mutual understanding of project deliverables and responsibilities over course of performance.

If you would like to meet to discuss further please do not hesitate in calling. JEA looks forward to finding a fair and equitable solution.

Sincerely,

Steve McInall, P.E.
Vice President, Energy and Water Planning

cc: Deryle Calhoun
Robert Zammataro

301 Franchise Proposal
August 9, 2019

Draft Terms:

Water System		
Topic	301 Partners LLC	JEA
Initial Water Treatment Plant	<ul style="list-style-type: none"> • Design, permits and constructs to JEA standards, Phasing TBD • Provide CUP to serve total proposed development • Dedicates to JEA for O&M. • Guarantees available Real Estate for initial plant capacity as well as that needed for future expansion (x upland acres). 	<ul style="list-style-type: none"> • Plan review, construction inspection according to JEA policies and procedures. • Purchases property in accordance with JEA real estate policy for initial plant capacity with option to buy for future expansion. • Own plant and provides O&M • Waives capacity fees for [X,XXX] ERCs.
Water Treatment Plant Expansion	<ul style="list-style-type: none"> • Guarantees available Real Estate for future expansion ([XX] upland acres). 	<ul style="list-style-type: none"> • Design, permits, constructs, owns, operates and maintains. • Purchases property in accordance with JEA real estate policy. • JEA has option to expand Initial WTP or connect water onsite distribution piping to the offsite JEA water grid, or combination thereof. <i>Needs to be determined by JEA Planning or When 50% of the ERCs are issued meters, then permitting commences, at 75% construction commences, at 90% construction is complete and infrastructure is in operation</i>
Water Storage and Re-pump	<ul style="list-style-type: none"> • Guarantees available Real Estate for future expansion ([XX] upland acres) internal to the development property. Coordinates project phasing with JEA so locations and needs may be evaluated. 	<ul style="list-style-type: none"> • Design, permits, constructs, owns, operates and maintains. Purchases property in accordance with JEA real estate policy.
Water Onsite Distribution Piping	<ul style="list-style-type: none"> • Design, permits and constructs to JEA standards. • Dedicates to JEA for O&M. 	<ul style="list-style-type: none"> • Plan review, construction inspection according to JEA policies and procedures. • Owns and provides O&M

Wastewater System		
Topic	301 Partners LLC	JEA
Initial Wastewater Treatment Plant (Package Plant for first phase)	<ul style="list-style-type: none"> Design, permits and constructs to JEA standards Dedicates to JEA for O&M. Guarantees available Real Estate for initial plant capacity as well that needed for future expansion ([XX] upland acres). 	<ul style="list-style-type: none"> Plan review, construction inspection according to JEA policies and procedures. Purchases property in accordance with JEA real estate policy for initial plant capacity with option to buy for future expansion. Own plant and provides O&M Waives capacity fees for [X,XXX] ERCs.
Regional Reclamation Facility and Offsite Force Main	<ul style="list-style-type: none"> Design, permits and constructs to JEA standards offsite force main and master pump station for conveyance of flow to the Regional WRF. Sizing to be based on development build-out flows. Dedicates to JEA for O&M. 	<ul style="list-style-type: none"> Design, permits, constructs, owns, operates and maintains Regional WRF. Determines site location and responsible for all real estate needs
Wastewater Onsite Collection Piping/ Pump Stations	<ul style="list-style-type: none"> Design, permits and constructs to JEA standards. Dedicates to JEA for O&M. 	<ul style="list-style-type: none"> Plan review, construction inspection according to JEA policies and procedures. Owns and provides O&M

Reclaimed Water System		
Topic	301 Partners LLC	JEA
Reclaim Water Storage and Re-pump (Future)	<ul style="list-style-type: none"> Guarantees available Real Estate for facility (x upland acres) internal to the development property. Coordinates project phasing with JEA so location and needs may be evaluated. 	<ul style="list-style-type: none"> Design, permits, constructs, owns, operates and maintains. Purchases property in accordance with JEA real estate policy.
Reclaim Water Augmentation Supply	<ul style="list-style-type: none"> Provide storage and augmentation capacity during the initial phases of development 	NA
Reclaim Water Transmission Piping	NA	<ul style="list-style-type: none"> Reclaimed main from 301 to Regional WRF. Min size to meet the needs for buildout of the 301 development. Design, permits, constructs, owns, operates and maintains.
Reclaim Water Distribution Piping	<ul style="list-style-type: none"> Design, permits and constructs to JEA standards. Dedicates to JEA for O&M. System may be served by potable jumper as needed. 	<ul style="list-style-type: none"> Plan review, construction inspection according to JEA policies and procedures. Owns and provides O&M