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FCRU's Response to Staff's 5<sup>th</sup> Request  
for Production of Documents Nos. 17-20

(including all attachments)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for water and wastewater  
service in Duval, Baker, and Nassau Counties,  
by First Coast Regional Utilities, Inc.

DOCKET NO. 20190168-WS

DATED: December 18, 2020

**FIRST COAST REGIONAL UTILITIES, INC.'S RESPONSE TO  
STAFF'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS TO  
FIRST COAST REGIONAL UTILITIES, INC. (NOS. 17 - 20)**

First Coast Regional Utilities, Inc. ("Applicant" or "First Coast" or "FCRU"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, responds to Staff's Fifth Request for Production of Documents.

**DOCUMENTS REQUESTED**

17. In response to staff's Third Request for Production of Documents, No. 12, the Utility stated that the work papers supporting the calculation of accumulated depreciation reflected on Exhibit DDS-1, pages 6-7, were included in pages 8-13 of the same exhibit. These work papers are labelled Schedule Nos. 2A and 2B for water and wastewater, respectively, and reflect the calculation of each system's capacity fee using specific plant accounts, along with corresponding calculations of accumulated depreciation, CIAC, accumulated amortization of CIAC, depreciation expense, and CIAC amortization expense only for those specific accounts. Please provide these same support calculations for the remaining plant accounts.

**Response:** The requested documentation is attached as Exhibit 1 to this Fifth Request for Production of Documents.

18. In First Coast's response to staff's third set of interrogatories, No. 27, a list of organization costs were listed, please provide supporting documentation for these amounts.

**Response:** Attached as Exhibit 2 to this Fifth Request for Production of Documents is a spreadsheet of the costs expended from the initial discussions and the filing of the Application and continuing through the defense to JEA's objections. Applicant realizes that until the resolution of the current matter costs will continue to accrue.

19. Please provide documentation in reference to the Palm Beach County Water Utilities salaries that were used to determine labor costs.

**Response:** Attached as Exhibit 3 to this Fifth Request for Production of Documents is a listing of the Palm Beach County WUD's job descriptions with the associated pay grades as well as the 2020 minimum pay scales for each pay grade. Mr. Beaudet has highlighted in yellow the job descriptions he included in his total salary estimate. While Mr. Beaudet no longer has access to the 2019 pay scales, they would be lower by approximately 2%.

20. Please provide the annual report for Royal Utilities referenced in the Utility's response to staff's request for production of documents number 12.

**Response:** Attached as Exhibit 4 to this Fifth Request for Production of Documents is the 2018 Annual Report for Royal Utilities, previously filed as FCRU bate stamp 001095 - 1180.

Respectfully submitted this 18th day of December, 2020.

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