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SERVICE COMMISSION
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August 18, 1999

VIA REGULAR U.S. MAIL

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Application by Nocatee Utility Corporation for Original Certificates for
Water and Wastewater Service in Duval and St. Johns Counties, Florida
Docket No. 990696-WS

Dear Ms. Bayo:

Enclosed for filing, please find the original and fifteen copies of Intercoastal's
First Request For Production Of Documents To Nocatee Utility Corporation.

Should you have any questions in this regard, please let me know.

Sincerely,

ROSE, SUNDSTROM & BENTLEY, LLP

John Wharton LM

John L. Wharton, Esq.
For The Firm

AFA _____
APP _____
CAF _____
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FPSC-RECORDS/REPORTING

In Re: Application by Nocatee)
Utility Corporation for Original)
Certificates for Water & Wastewater) Docket No. 990696-WS
Service in Duval and St. Johns)
Counties, Florida)
_____)

INTERCOASTAL UTILITIES, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO NOCATEE UTILITY CORPORATION

Intercoastal Utilities, Inc. requests pursuant to Rule 28-106.206, Fla. Admin. Code, that Nocatee Utility Corporation produce the documents described below for inspection and/or copying within thirty (30) days at such place as may be agreed upon between the respective parties, or in default thereof, specified by order of the Commission.

DEFINITIONS AND INSTRUCTIONS

1. "Nocatee," "you" or "your" refer to Nocatee Utility Corporation, its parent, affiliated parties, its employees, agents, engineers, accountants, or attorneys.
2. "Document" and "documents" refer to any written, printed, graphic, digital, aural, or photographic means of recording or preserving thought, expression, information, data, or images. This shall include all papers or other tangible things from which such information can be read, processed, or transcribed; graphic, schematic, and cartographic representations; film, video, digital, or still photographic images or reproductions (including aerial, satellite, infrared and computer-generated images); and any other information which is stored or processed by means of computer or data

processing equipment and can be retrieved in printed or graphic form. The word "document" includes the plural as well as the singular and shall mean all originals (including an original by means of a marginal notation) and copies or reproduction of originals (whether handwritten, printed, photocopied, or otherwise recorded) if the original is unavailable.

3. All terms not defined in this request and not having ordinary, nontechnical definitions are used in accordance with their meanings in the Florida Rules of Civil Procedure, Florida Statutes, and Florida Administrative Code.

4. If any document called for in this request is withheld on the basis of any privilege, statute, regulation, or for any other reason, the Petitioners shall include in their response a list of such documents by type of document, date, the name and address of the actual and intended recipients of the document or copies thereof, author, title, summary of description of subject matter, and the location of any existing copies of such document. Petitioners must also state the grounds upon which each such document is considered privileged or upon which production is withheld, including the specific privilege, statute or regulation relied upon.

DOCUMENTS AND OTHER THINGS TO BE PRODUCED

1. Please provide copies of all documents, reports, compilations of data, exhibits, summaries, analyses and treatises which you expect to offer into evidence or rely upon at the final hearing in this proceeding.

2. Any and all correspondence, analyses, memorandums, or similar or analogous documents either transmitted to JEA or received from JEA regarding the possible or potential service by JEA (whether as a bulk, wholesale, or retail provider) to any of that area for which you have filed an application at the Public Service Commission. Your response should include, but should not be limited to, documents to or from JEA whether JEA intends to provide bulk service to a separate utility which will provide service to any of these areas or whether JEA will provide such service directly itself.

3. Any and all reports, analyses, memorandums, or similar or analogous documents referencing, discussing, analyzing, setting forth, establishing, or projecting the need or demand for reuse water in any of that area for which you have filed an application at the Public Service Commission. Your response should include, but not be limited to, documents discussing the timing or time frames regarding the demand for such reuse water.

4. Any and all documents describing, analyzing, setting forth, establishing, projecting, or discussing the demand for water and/or wastewater service in those areas for which you have filed an application at the Public Service Commission. Your response should include, but not be limited to, documents discussing the number of units projected to be built or potentially to be built; the timing of any units projected to be built or potentially to be built; the type (commercial, residential, etc.) of units projected to be built or potentially to be built; and the location or layout of any such units projected to be built or potentially to be built.

5. Please provide any documents which set forth, project, analyze, reference, discuss, or establish the location of any facilities for the provision of water service, wastewater service, or reuse service, by any utility within any portion of those areas for which you have filed an application at the Public Service Commission.

6. Please provide any documents which support, reference, discuss, or analyze any of the information, statements, or contentions contained in either your application to the Florida Public Service Commission or your Petition for Temporary Variance filed before the Public Service Commission.

7. Please provide any documents you reference, consulted or relied upon in filing either your application at the Public Service commission or your Petition for Temporary Variance before the Public Service commission;

8. Please provide any documents which set forth, reveal, analyze, reference or contain timetables for the construction of units or facilities which will require water, wastewater, or reuse service or which set forth the anticipated time frames for the construction of any such units in the area which is the subject of your application with the Public Service Commission;

9. Please provide any correspondence, writings, memorandums, or similar or analogous documents exchanged between yourself and St. Johns County discussing, referencing, analyzing, or concerning the provision of water service, wastewater service, or reuse service for the area which is the subject of your application before the Public Service Commission;

10. Please provide any documents analyzing, concerning, referencing, or discussing available or potentially available alternatives for the provision of water service, wastewater service, or reuse service (by any water or wastewater utility) to those areas which are the subject of your application before the Florida Public Service Commission.

11. Please provide any and all documents, writings, memorandums, applications, or similar analogous documents provided to, or received from, any governmental entity or agency regarding the permitting, licensure, approval, or certification of either the Nocatee development itself or the Nocatee Utility Corporation. Your response should include, but not be limited to, any documents filed to obtain approvals necessary from governmental entities having jurisdiction over the development of property referred to as Nocatee (such as documents related to the proposed Development of Regional Impact).

12. Please provide any study, analysis, memorandum, report, or similar or analogous document evaluating, studying, determining, reviewing, or discussing reuse water, and wastewater demand for Phase I of the Nocatee project.

13. Please provide any study, analysis, memorandum, report, or similar or analogous document evaluating, studying, determining, reviewing, or discussing projected flows for build-out for the Nocatee project both in terms of potable water demand, wastewater generation, and reuse demand.

14. Please provide the water supply development plan and the Comprehensive Water Modeling Plan developed by CH2M Hill as referenced by DDI's witnesses in the

Intercoastal/St. Johns County extension case.

15. Please supply any document, analysis, report, memorandum, or similar or analogous document which either constitutes a water resource plan based on projected water needs for Nocatee on a phase-by-phase basis from Phase I out through Phase V; which identifies the number and general locations of the wells that would be needed to serve the Nocatee development; and which studies and considers various alternatives and comes up with a preferred alternative; and which includes computer modeling of the impact of the water use of the groundwater resources, all as referred to by DDI's witnesses in the Intercoastal/St. Johns County extension case.

16. Please provide any documents which reference, constitute, discuss, or comprise the peer review of that groundwater supply development plan as referenced by DDI's witnesses in the Intercoastal/St. Johns County extension case.

17. Please provide any documents which were consulted, relied upon, referenced, or utilized in order to create NEWRAP (the Nocatee Environmental and Water Resource Area Plan).

18. Please provide any documents which comprise, explain, set forth, detail, discuss, or reference NEWRAP.

19. Please provide any documents which discuss, reference, concern, analyze, or otherwise review either the service, rates, or operations, or the projected service, rates or operations, of Intercoastal Utilities.

20. Please provide any documents discussing, referencing, analyzing, referring to, or concerning the reuse of stormwater. Your response should include, but not be

limited to, the reuse of such stormwater for fire protection.

21. Please provide any documents discussing, referencing, analyzing, referring to, or concerning the utilization of reuse for fire protection.

22. For the Nocatee development, please provide the following documents:

- a) Any plans, maps, or documents which reveal, show, establish or discuss the phasing for the Nocatee development.
- b) Any documents or schedules which discuss the Nocatee development by descriptive types. Your response should include, but not be limited to, documents which set forth descriptive statistics by structure types, construction initiation dates, and build-out dates.
- c) Any documents which project, discuss, establish, reference, or concern average daily demand, maximum daily demand, or peak demands for water and wastewater service in the Nocatee development.
- d) Any documents which discuss, project, establish or reference the expected population which will occupy the Nocatee development.
- e) Any documents which discuss, reference, relate to, evaluate, or project the number of equivalent residential connections for potable water, domestic wastewater, process/industrial wastewater, or fire flow for the Nocatee development.

- f) As to the Nocatee development, any documents which discuss the number of acres (or other approximation of land size or area) which will require irrigation; the average daily demand for reuse; the maximum daily demand for reuse and the production uses for reuse. Your response should include, but not be limited to, documents which discuss each of the above-referenced categories with regard to residential, commercial, industrial, green spaces, golf courses, and other potential users or application areas.

23. Please provide documents which discuss, reference, concern, project or calculate projected impervious areas; retention areas (both in terms of acres and capacities); run-off volumes and rates; major drainage paths; drainage area outlets; and any maps, schematics or plans which reveal any of the above-referenced information.

24. Please provide a copy of Map "A" from Appendix 1 (page 6) of your ADA pre-application document.

25. Please provide a copy of any Duval and St. Johns County Comprehensive Plan amendments, projected plan amendments, or documents discussing or referencing any such plan amendments, submitted with your ADA pre-application document (page 25).

26. Please provide a copy of the Nocatee Groundwater Development Plan as referenced on page 28 of your ADA pre-application document.

27. Please provide documents revealing, discussing, referencing, explaining, or setting forth the location of any proposed water, wastewater, or reuse utilities

(including, but not limited to, treatment facilities, mains, points of delivery from bulk providers, and appurtenant and related facilities) for any portion of the Nocatee development.

DATED this 18th day of August, 1999.


JOHN L. WHARTON, ESQ.
Rose, Sundstrom & Bentley, LLP
2548 Blairstone Pines Drive
Tallahassee, FL 32301
(850) 877-6555

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by the method indicated below to the following on this 18th day of August, 1999.

Richard D. Melson, Esq.
Hopping, Green, Sams & Smith, P.A.
P.O. Box 6526
Tallahassee, FL 32301

Via U.S. Mail & Facsimile

Samantha Cibula, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Via U.S. Mail


John L. Wharton, Esq.

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