

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY OF

DOUGLAS C. MILLER

ON BEHALF OF

NOCATEE UTILITY CORPORATION

DOCKET NO. 990696-WS

February 11, 2000

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RECORDS

9 Q. Please state your name and business address.

10 A. My name is Douglas C. Miller. My business address is  
11 14775 St. Augustine Road, Jacksonville, Florida 32258.

12 Q. By whom are you employed and in what capacity?

13 A. I am a principal in the civil engineering firm of  
14 England-Thims & Miller. We are a full service civil  
15 engineering firm that specializes in both public and  
16 private infrastructure, including water and wastewater  
17 utilities. I currently serve as President of that  
18 firm.

19 Q. Please describe your background and experience.

20 A. I earned a Bachelor of Science degree in Civil  
21 Engineering from the University of Florida in 1975. I  
22 am a licensed professional engineer in the state of  
23 Florida and have practiced professional engineering in  
24 Florida for the past 25 years. I began my career  
25 working for a consulting engineering company in

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FPSC-RECORDS/REPORTING

1           Gainesville, Florida and later worked as a municipal  
2           engineer for the City of Jacksonville. I joined the  
3           firm of England-Thims and Miller (ETM) as a managing  
4           principal in 1980. Over the past 20 years I have  
5           directed the design of both public and private projects  
6           that require expertise in water resource management,  
7           water and wastewater planning and design, stormwater  
8           design, environmental permitting, transportation, and  
9           solid waste management. My water and wastewater  
10          utility experience includes work for the 10,000-acre  
11          Argyle Forest DRI in Jacksonville, the 4,150-acre  
12          Julington Creek DRI in St. Johns County, the 6,400-acre  
13          Saint Johns DRI in St. Johns County, and for DuLay  
14          Utility Company, which has a 10,000-acre water and  
15          sewer utility franchise in Duval and Clay Counties. I  
16          have attached a copy of my resume as Exhibit \_\_\_\_ (DCM-  
17          1).

18   **Q.   Have you previously been qualified by courts and**  
19       **administrative agencies to give expert engineering**  
20       **testimony?**

21   A.   Yes, I have been qualified as an expert in Water and  
22       Sewer Utility Design, Environmental Engineering, Cost  
23       Estimating, Stormwater Management, and Solid Waste  
24       Management.

25   **Q.   Have you previously testified before the Florida Public**  
26       **Service Commission on utility matters?**

1 A. Yes, as the Engineer of Record for DuLay Utility  
2 Company in a PSC public hearing.

3 **Q. What is your relationship to Nocatee Utility**  
4 **Corporation and its parent company, DDI, Inc.?**

5 A. ETM has been engaged by DDI, Inc. to perform a full  
6 range of engineering services in connection with  
7 planning, permitting and development of the Nocatee  
8 development of regional impact. I am the principal in  
9 our firm in charge of that engagement and I serve as  
10 Engineer of Record for the project. One of my  
11 responsibilities has been to advise DDI about utility  
12 matters and to perform the master planning for the  
13 water, wastewater and reuse system for the development.

14 **Q. What is the purpose of your testimony?**

15 A. The purpose of my testimony is to provide information  
16 on the water, wastewater and reuse needs of the Nocatee  
17 development and to describe Nocatee Utility  
18 Corporation's plan for meeting those needs. To avoid  
19 confusion, I will try to use the term "Nocatee" to  
20 refer to the development and the term "NUC" or  
21 "Utility" to refer to Nocatee Utility Corporation.

22 **Q. Are you sponsoring any exhibits in this proceeding?**

23 A. Yes. I am sponsoring portions of Nocatee Utility  
24 Corporation's Application in this proceeding,  
25 specifically Exhibits A through G, K and L and  
26 Supplemental Exhibit Q. I have also attached several

1 other exhibits which are referred to at the appropriate  
2 places in my testimony.

3 **Q. Please provide an overview of the Nocatee development.**

4 A. As Mr. Skelton briefly described, Nocatee is a 15,000  
5 acre development of regional impact (DRI) located in  
6 Duval and St. Johns Counties. The application for  
7 development approval (ADA) for the project was filed in  
8 early February 2000 and is in the process of being  
9 reviewed by St. Johns County, Duval County, the  
10 Department of Community Affairs, and other interested  
11 agencies.

12 Nocatee will be developed in five phases over a  
13 total development horizon of approximately 25 years.  
14 Phase I, which covers the time period from  
15 approximately 2001 to 2005, includes property in both  
16 Duval and St. Johns Counties.

17 The map attached to my testimony as Exhibit \_\_\_\_  
18 (DCM-2) shows the Nocatee development and highlights  
19 the area included within Phase I.

20 **Q. How does NUC's proposed service territory relate to the  
21 Nocatee development?**

22 A. The two areas are identical. The boundaries of the  
23 Nocatee development have changed slightly since NUC's  
24 Application was submitted last year. A revised  
25 territory description which matches the final  
26 boundaries of the Nocatee development is being filed

1 concurrently as Revised Exhibit K to the Application,  
2 and is depicted on the maps being filed as Revised  
3 Exhibit L.

4 **Q. Have you prepared an exhibit that summarizes the**  
5 **projected water, wastewater and reuse needs for Nocatee**  
6 **by phase over the life of the development?**

7 A. Yes, I have attached those projections as Exhibit \_\_\_\_  
8 (DCM-3). As this exhibit shows, the Phase I needs for  
9 Nocatee include a potable water demand of 0.729 million  
10 gallons per day (MGD), a wastewater demand of 0.614  
11 MGD, and a reuse demand of 1.535 MGD for irrigation  
12 purposes. These increase to 6.120 MGD of potable  
13 water, 5.208 MGD of wastewater, and 6.736 MGD of reuse  
14 demand by build-out in around 2025.

15 **Q. How does NUC propose to meet the projected reuse**  
16 **demand?**

17 A. NUC proposes to meet 20% of the reuse demand with on-  
18 site stormwater, leaving 80% to be met by treated  
19 effluent. This means that 1.228 MGD of treated  
20 effluent will be required at the end of Phase I,  
21 increasing to 5.390 MGD at build-out.

22 **Q. How did NUC arrive at the 80/20 split between treated**  
23 **effluent and on-site stormwater?**

24 A. This was based on ETM's experience with Consumptive Use  
25 permitting and operations of irrigation systems in  
26 large scale community developments with golf courses

1           located in St. Johns County. These include Julington  
2           Creek Plantation DRI and Saint Johns DRI, both of which  
3           use reuse and stormwater as irrigation sources.

4   **Q. Can Nocatee's total requirement for treated effluent be**  
5   **met by wastewater generated by the project?**

6   A. No. The requirement for treated effluent for reuse  
7           exceeds the wastewater generated by the development in  
8           every phase, and the shortfall is most significant in  
9           the early stages of the development. At the end of  
10          Phase I, for example, only about 50% of the need for  
11          treated effluent can be met by wastewater generated on  
12          site. This means that NUC must secure an off-site  
13          source of treated effluent in order to satisfy the  
14          needs of the service territory.

15   **Q. Could the shortfall be met by increased use of**  
16   **stormwater?**

17   A. No, stormwater for reuse is derived from the runoff  
18          component of rainfall. The highest irrigation demands  
19          obviously occur during periods of low rainfall. This  
20          is particularly true in years of low rainfall or  
21          drought. Stormwater is simply not a reliable source of  
22          reuse water for a large community that is committed to  
23          meeting 100% of its irrigation demand by reuse.

1 Q. Could the irrigation demands be met using a groundwater  
2 source?

3 A. No. Nocatee has committed in its DRI Application for  
4 Development Approval to not use groundwater as a  
5 primary source for irrigation. This commitment is part  
6 of Nocatee's Comprehensive Water Resource Protection  
7 Plan. Specifically, the Floridan Aquifer is the  
8 region's primary potable water supply which should be  
9 conserved for obvious reasons. The surficial aquifer  
10 is problematic as an irrigation source for Nocatee  
11 because of the approximately 7,000 acres of wetland  
12 systems on the site. The wetland systems are primarily  
13 supported by the surficial groundwater system in the  
14 area. Large withdrawals from this source for  
15 irrigation would likely impact these systems adversely.

16 Q. Please describe NUC's plan for providing service to the  
17 territory it has applied for.

18 A. NUC plans to obtain bulk water, wastewater and reuse  
19 service from JEA. JEA will provide that service at its  
20 tariffed bulk rates from water and wastewater treatment  
21 plants located in Duval County.

22 The point of connection between JEA's system and  
23 NUC's system will be located in Duval County, at the  
24 boundary of NUC's service territory. NUC will own the  
25 water transmission and distribution facilities, the  
26 wastewater collection facilities, and the reuse

1 transmission, storage and distribution facilities  
2 within its territory. Large trunk mains will be  
3 provided by NUC and smaller distribution mains will be  
4 contributed by the developer. In addition, NUC will  
5 provide on-site reuse storage and pumping facilities.

6 **Q. What steps have been taken to obtain bulk service from**  
7 **JEA?**

8 A. On April 14, 1999, DDI and JEA entered into a Letter of  
9 Intent which is included in the Application as Exhibit  
10 A-1. The Letter of Intent outlines the general terms  
11 of service that will be included in a detailed  
12 Wholesale Service Agreement to be negotiated once NUC  
13 has obtained a certificate from the Commission to serve  
14 the Nocatee development. For ease of reference, a copy  
15 of this Letter of Intent (without exhibits) is attached  
16 as Exhibit \_\_\_\_ (DCM-4). In addition, NUC recently  
17 obtained a letter from JEA confirming the availability  
18 of wholesale water, wastewater and reuse service in the  
19 quantities required by the project. See Exhibit \_\_\_\_  
20 (DCM-5).

21 **Q. What is the basis for your familiarity with the JEA**  
22 **Letter of Intent?**

23 A. I participated in the negotiation of the agreement with  
24 JEA on behalf of DDI.

25 **Q. Has there been any further interaction with JEA since**  
26 **the date of the Letter of Intent?**



1 A. Yes, because NUC's certification proceeding has been  
2 delayed as a consequence of the Commission's order  
3 denying its request for partial waiver of the filing  
4 requirements, JEA and NUC have discussed attempting to  
5 finalize a Wholesale Service Agreement even before NUC  
6 obtains final certification from the Commission. I  
7 currently expect that negotiations will begin before  
8 the end of the first quarter of this year.

9 **Q. Why has NUC opted to provide service through a**  
10 **wholesale agreement with JEA rather than through the**  
11 **construction and operation of its own on-site water and**  
12 **wastewater treatment facilities?**

13 A. The agreement with JEA offers a number of advantages.  
14 JEA is the largest provider of utility service in the  
15 area, and the partnership with JEA will enable NUC and  
16 its customers to enjoy the benefits of JEA's experience  
17 and economies of scale. By having the water and  
18 wastewater treatment facilities located off-site, NUC  
19 is able to help meet DDI's goal of minimizing the  
20 environmental impacts of the Nocatee development.  
21 Finally, from the outset of the development JEA can  
22 provide treated effluent in sufficient quantities to  
23 implement a reuse irrigation system throughout Nocatee.

24 In short, JEA can support NUC's provision of  
25 reliable, timely, low-cost service in a manner that is

1 consistent with the overall environmental goals of the  
2 development.

3 **Q. How does NUC plan to manage the day-to-day operation of**  
4 **the utility?**

5 A. As stated in Exhibit H to the Application, NUC expects  
6 to obtain operations, management and billing services  
7 from a third-party provider with experience in water  
8 and wastewater utility management. Under the Letter of  
9 Intent with JEA, NUC has the option to obtain such  
10 services from JEA. I expect that this will be a part  
11 of the upcoming negotiations with JEA on a final  
12 Wholesale Service Agreement.

13 **Q. What if NUC is unable to reach a satisfactory**  
14 **management agreement with JEA?**

15 A. There are other qualified entities in the area that are  
16 ready and willing to provide such services. In  
17 December 1999, NUC issued a request for qualifications  
18 and statement of interest in providing administrative,  
19 operations and maintenance services for the utility.  
20 In addition to JEA, United Water Resources submitted a  
21 comprehensive response that detailed their interest and  
22 ability to provide these types of services to NUC on a  
23 contract basis.

24 **Q. What master planning work has ETM performed for the on-**  
25 **site facilities?**

1 A. ETM has developed a master utility plan for water,  
2 wastewater and reuse services for Nocatee. This  
3 planning effort included groundwater studies,  
4 alternative treatment options, as well as extensive  
5 hydraulic modeling of project phases and alternatives.  
6 Exhibit \_\_\_ (DCM-6) represents the proposed Phase I  
7 service for Nocatee. Exhibit \_\_\_ (DCM-7) shows the  
8 master plan for the project at buildout.

9 **Q. As part of that master planning effort, has ETM**  
10 **prepared a cost estimate for the on-site facilities**  
11 **that will be required to serve Phase I of the**  
12 **development?**

13 A. Yes. Exhibit \_\_\_ (DCM-8) identifies the on-site  
14 facilities that will be required to serve Phase I of  
15 the development, together with their projected costs.  
16 This information was furnished to Ms. Swain for her use  
17 in developing proposed rates for the utility.

18 **Q. Is service by NUC consistent with the Duval and St.**  
19 **Johns County Comprehensive Plans?**

20 A. Yes. I have reviewed the portions of each county's  
21 comprehensive plan related to utility service and found  
22 NUC's plan to be consistent with the goals, objectives  
23 and policies of each plan. Specifics of this can be  
24 found in the Comprehensive Plan Amendment for the  
25 Nocatee Project to be submitted to each county.

1 Q. In your opinion, is there an advantage to having  
2 utility service for Nocatee provided by NUC as opposed  
3 to an unrelated third-party utility?

4 A. Yes. One of the major policy directions that we have  
5 received in our role as Engineer of Record for Nocatee  
6 is that the project is to be developed in the most  
7 environmentally-sensitive manner possible. DDI's  
8 commitment to protect the water resources in the area,  
9 including its commitment to employ reuse for all  
10 irrigation within the project, is just one example of  
11 the way this sensitivity is being reflected in planning  
12 for the project. These environmental concerns are much  
13 easier to address in a comprehensive manner when  
14 utility planning is conducted under the same roof as  
15 planning for other aspects of the development. For  
16 this reason alone, NUC is uniquely positioned to  
17 provide service in a manner that is consistent with the  
18 needs of the development.

19 Q. As advisor to DDI on utility planning matters, did you  
20 consider whether the system proposed by NUC would  
21 compete with or duplicate any existing utility system?

22 A. Yes I did. There is no other utility currently  
23 providing service in any portion of the territory that  
24 NUC has applied for. As of today, JEA has backbone  
25 facilities in closer proximity to the property than any  
26 other potential wholesale or retail provider. Based on

1 a preliminary analysis of potential service from other  
2 utilities in the area, I concluded that retail service  
3 by NUC, supported by wholesale service from JEA, is the  
4 best plan for providing service to Nocatee.

5 **Q. Does that conclude your testimony?**

6 **A. Yes it does.**

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**VITAE**  
**Douglas C. Miller, P.E.**  
**President**  
**ENGLAND, THIMS & MILLER, INC.**

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**14775 St. Augustine Road**  
**Jacksonville, Florida 32258**

Mr. Miller's 25 year public works and environmental engineering career has incorporated both private consulting and municipal engineering. As a municipal engineer for the City of Jacksonville, Mr. Miller was responsible for roadway and drainage design, bridge design and inspection, and drainage basin improvements. He was also responsible for the development of the stormwater detention analysis criteria used by the City.

For the past 20 years, Mr. Miller has been a managing principal of England, Thims & Miller, Inc. He directs the design of private and public projects that require expertise in transportation, water resource management, environmental permitting, solid waste management, stormwater design, and water and wastewater planning and design. Mr. Miller has directed construction management and contract administration services on construction projects valued in excess of 500 million dollars.

He has been recognized as an expert in legal proceedings and administrative hearings in the following areas: Environmental Engineering, Stormwater Management, Solid Waste Management, and Water and Sewer Utility Designs

Mr. Miller has served as a member of the following:

- Florida Department of Environmental Protection Technical Advisory Committee on Solid Waste
- Mayor Delaney's Transition Team (Committee Chairman)
- Mayor Delaney's Growth Management Task Force (Committee Chairman)

***Education***

B.S. in Civil Engineering, University of Florida, 1975

***Professional Registration***

Florida Professional Engineer, No 22389  
Registered Bridge Inspector (00052)

***Professional Membership***

Florida Engineering Society  
American Society of Civil Engineers  
National Society of Professional Engineers

***Professional Experience***

- ***JCP Wastewater Treatment Facility, St. Johns County, Florida***  
Principal-in-Charge responsible for 1.0 mgd expansion of treatment capacity for a sequencing batch reactor plant with conventional treatment, chlorine disinfection and reuse disposal.
- ***DuLay Utility Company, Clay and Duval County, Florida***  
Engineer of Record for 10,000± acre water and sewer utility franchise. Projects included water and wastewater plant design, and project-wide master planning.
- ***Julington Creek Plantation, St. Johns County, Florida***  
Engineer of Record for the 4,150 acre mixed use development in St. Johns County. This includes the master utility plan design and permitting and the master plan for the stormwater system, management of storage of surface waters and flood control for Flora Branch Creek.

**VITAE**  
**Douglas C. Miller, P.E.**  
**President**  
**ENGLAND, THIMS & MILLER, INC.**  



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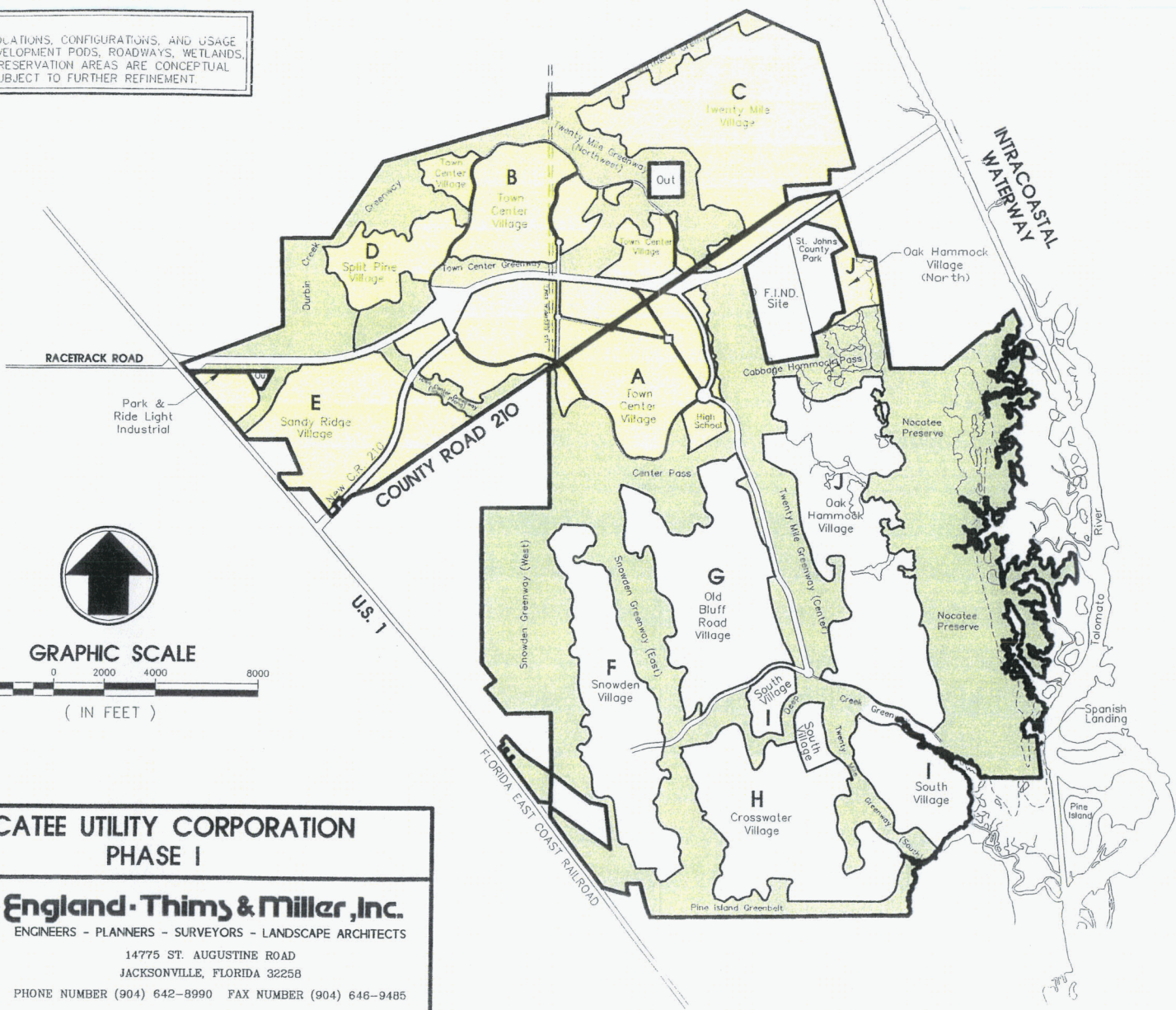
**14775 St. Augustine Road**  
**Jacksonville, Florida 32258**

- ***Saint. Johns DRI, St. Johns County, Florida***  
Developed master water and sewer utility plan for 6,400± acre Development of Regional Impact.
- ***Nocatee DRI, St. Johns County, Florida***  
Engineer of Record for a proposed 15,000± acre Development of Regional Impact including conducting water and sewer master planning and water supply studies.
- ***Rosemary Hill Landfill Class I and Class III, Clay County, Florida***  
Principal-in-Charge responsible for the design and environmental permitting including stormwater management, groundwater, and surface water monitoring plans for a 140 acre landfill.
- ***Trail Ridge Landfill, Jacksonville, Florida***  
Principal-in-Charge responsible for the design and engineering of a 1,200-acre Class I and Class III Landfill. Special emphasis was placed on the stormwater plan and the liner design.
- ***Mandarin Drainage Study, Jacksonville, Florida***  
Principal-in-Charge for the master stormwater management plan, permitting and water quality study encompassing 20 square miles in southeast Jacksonville..
- ***National Pollutant Discharge Elimination System Permit Parts 1 & 2, Jacksonville, Florida***  
Responsible for managing one of the largest single NPDES stormwater permits in the nation. Part 1 of the permit application included the inventory and mapping of over 850 square miles of stormwater systems, identification and discharge characterization of all non-point sources, development of a monitoring plan along with general information about the physical, legal and financial aspects of the City's stormwater system. Part 2 includes additional water quality sampling along with establishing legal and regulatory controls to bring all stormwater discharges in the City of Jacksonville into compliance with State and Federal Water quality standards.
- ***Argyle Forest Subdivision, Jacksonville, Florida***  
Principal-in-Charge of 10,000± acre DRI project. Project included roadway design, utility design and master stormwater management design and permitting. Also included was the first wet detention system to be permitted by the St. Johns River Water Management District, as well as 60 acres of wetlands used for stormwater treatment.
- ***I-295 Widening Regional Treatment Facility***  
Principal-in-Charge responsible for analysis and design for the replacement of the proposed linear stormwater management system with a regional treatment facility. This process included an extensive site selection investigation process with hydraulic and water quality modeling. As a result of these analyses, a site for one regional stormwater facility was selected that would provide up to 20 times the pollutant removal of the previously proposed five miles of roadside treatment system. A wet detention facility was designed and permitted, providing the FDOT with a highly effective and low maintenance treatment facility.

**NOTE:**  
 THE LOCATIONS, CONFIGURATIONS, AND USAGE OF DEVELOPMENT PODS, ROADWAYS, WETLANDS, AND PRESERVATION AREAS ARE CONCEPTUAL AND SUBJECT TO FURTHER REFINEMENT.

**LEGEND**

-  PHASE I - DEVELOPMENT PODS
-  GREENWAY
- A** DEVELOPMENT POD DESIGNATION



**NOCATEE UTILITY CORPORATION  
 PHASE I**

**England-Thimby & Miller, Inc.**  
 ENGINEERS - PLANNERS - SURVEYORS - LANDSCAPE ARCHITECTS

14775 ST. AUGUSTINE ROAD  
 JACKSONVILLE, FLORIDA 32258

PHONE NUMBER (904) 642-8990 FAX NUMBER (904) 646-9485



**SUMMARY OF  
WATER, WASTEWATER AND REUSE DEMAND  
BY PHASE**

<b>Phase</b>	<b>Water ADF (MGD)</b>	<b>Wastewater ADF (MGD)</b>	<b>Reuse* ADF (MGD)</b>
Phase 1	0.729	0.614	1.228
Phase 2	1.111	0.941	0.840
Phase 3	1.494	1.285	1.352
Phase 4	1.422	1.213	1.341
Phase 5	1.365	1.156	0.629
Total	6.121	5.209	5.390

\* An additional 20% reuse demand will be provided by on-site stormwater.

**D.D.I., Inc.**  
**4310 Pablo Oaks Court**  
**Jacksonville, Florida 32224**

April 14, 1999

JEA  
21 West Church Street  
Jacksonville, FL 32202

**RE: Proposed Agreement for Wholesale Water and Wastewater Service**

Ladies and Gentleman:

D.D.I., Inc. and its affiliate Estuary Corporation (herein collectively referred to as "DDI") are the owner of certain lands located in Duval and St. Johns Counties as more particularly described on Exhibit "A" attached hereto and made a part hereof (the "Property"). DDI intends to make application for certain development approvals from federal, state and local governmental agencies and authorities to permit development of the Property. DDI, either directly or through its affiliates (the "Utility Company"), also intends to make application with the Florida Public Service Commission ("PSC") for certification as a water and wastewater utility to service the Property (the "PSC Certification").

JEA is a certified water and wastewater utility service provider authorized by Ordinance 97-12-E, to provide water and wastewater utility service on a wholesale and retail basis. JEA and DDI have executed this Letter of Intent to evidence their mutual interest in entering into an Agreement for Wholesale Water and Wastewater Service Supply to the Property and to reflect certain agreements with respect to the processing of the PSC Certification by DDI or the Utility Company until such time as a final agreement for Wholesale Water and Wastewater service can be consummated between JEA and DDI.

**1. Wholesale Service Agreement.** At such time as the Utility Company shall obtain PSC Certification for the Property on terms and conditions satisfactory to it in its sole discretion, the Utility Company and JEA shall negotiate in good faith the terms of a wholesale service agreement for the supply of water and wastewater utility service, including reuse water ("Water and Wastewater Utility Service") to the Property (the "Service Agreement") in accordance with the plan of development established by DDI for the Property (the "Development Plan").

2. **General Terms of Service Agreement.** The parties agree that the general terms of the Service Agreement shall include those provisions customarily incorporated in the wholesale service agreements between JEA and other customers in the area and shall include the following provisions:

- 2.1 **Capital Improvements and Service Obligations.** The cost of transmission lines and easement locations for Water and Wastewater Utility Service on and off site necessary to serve the Development plan shall be mutually agreed upon between JEA , DDI, and the Utility Company.
- 2.2 **Cost of Service.** The Utility Company shall pay to JEA for wholesale Water and Wastewater Services to the Property those amounts in accordance with the Published Tariff Rates for Water and Sewer as may be amended pursuant to public hearing based on cost of service. (see Exhibit "B")
- 2.3 **Right of First Refusal.** The Utility Company shall provide to JEA on terms and conditions mutually satisfactory to them a right of first refusal to purchase the utilities system; provided, however that portion of the system within Duval County normally transferred by a developer to JEA at no cost will be transferred at no cost to the JEA under this provision whether or not JEA is the successful purchaser of the system as a whole.
- 2.4 **Term of Agreement.** The term of the Service Agreement shall continue through the estimated completion date of the Development Plan (presently 20 years) with terms of renewal as may be mutually agreed upon between the parties.
- 2.5 **Management.** At the option of the Utility Company, JEA will provide operations management service to the Utility Company at rates to be agreed upon between JEA and the Utility Company. Further, the Utility Company agrees that should it elect to out-source billing services, JEA will be afforded a right of first refusal to provide such services on terms and conditions mutually agreed upon between JEA and the Utility Company. If the Utility Company elects to outsource operations or management, JEA will be afforded the exclusive right to provide such services at JEA's allocated cost, to that portion of a contiguous service territory comparable to the Duval County portion of the Property.

2.6 **Well Sites.** DDI agrees to supply well sites and a water plant site to JEA as may be reasonably necessary to service the Property, the location, number and capacity of well sites to be mutually agreed upon between JEA and DDI, consistent with all permitting requirements for the Property and consistent with all water resource management plan requirements for the Property as may be developed by DDI.

2.7 **Exclusive Provider.** During the term of the Service Agreement, JEA shall be the exclusive wholesale provider of Water and Wastewater Utility Service to the Property.

3. **Pending PSC Certification.** In consideration of the terms of this Letter of Intent, JEA agrees that until expiration of this Letter of Intent (and thereafter during the term of the Utility Service Agreement) the Utility Company shall have the sole and exclusive right to purchase wholesale or retail Water and Wastewater Utility Service of any kind or nature from JEA to service the Property and until expiration of this Letter of Intent, JEA agrees that it will not take a position adverse to the Utility Company in its application for the PSC Certification at the administrative or judicial levels, and will cooperate in good faith with the Utility Company in its application for the PSC Certification.

4. **Failure to Obtain Certification.** In the event DDI or the Utility Company shall abandon the PSC Certification application or if the PSC application is finally denied without appeal, or if JEA and DDI are unable to reach mutual agreement upon final terms and provisions of the Service Agreement, then in such event JEA, DDI and Utility Company acknowledge and agree that they shall mutually agree upon a division of a comparable contiguous service territory such that the integrity of the system is maintained to the greatest extent possible as to the Duval County customers.

5. **Term of this Letter of Intent.** This Letter of Intent shall remain in effect until the earlier of (i) such time as DDI or the Utility Company shall abandon the PSC Certification application; (ii) such PSC Certification application shall be finally denied without appeal; or (iii) twenty four (24) months from the date hereof as may be extended thereafter for such period of time as the Utility Company continues pursuit of any contested element of the

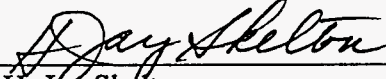
PSC Certification through the administrative or judicial process, it being intended that the term of this Letter of Intent shall be extended through the time period of any such proceedings.

DDI and JEA intend that this letter represents their agreement to negotiate in good faith with respect to the term of the final Service Agreement on the general terms and conditions outlined herein. The parties acknowledge that no legal obligation is created between JEA and DDI as to the terms of the final Service Agreement until such time as DDI or the Utility Company and JEA shall enter into the Service Agreement on terms acceptable to both of them. Each party to this Letter of Intent represents that it has the authority to execute and deliver this Letter of Intent without the consent or joinder of any other party.

If the foregoing correctly reflects our understandings, please execute the enclosed acknowledgment copy of this letter.

Very truly yours,

D.D.I., INC. A Florida corporation

By:   
Name: H. Jay Skelton  
Title: President

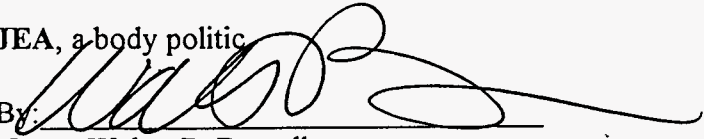
\_\_\_\_\_  
Print Name: \_\_\_\_\_

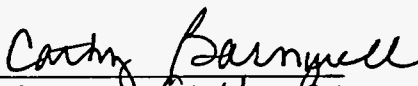
\_\_\_\_\_  
Print Name: \_\_\_\_\_

[CORPORATE SEAL]

The undersigned acknowledges and agrees to the foregoing.

JEA, a body politic

By:   
Name: Walter P. Bussells  
Title: Managing Director and  
Chief Executive Officer

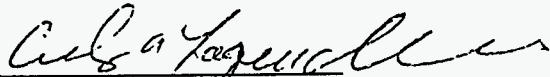
  
Print Name: Cathy Barnwell

[CORPORATE SEAL]

JEA Letter of Intent  
April 14, 1999  
Page 5

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APPROVED:

  
Office of General Counsel

G:\SHARED\CINDYL\JEA\WATERAGR\DDIC414.WPD

21 West Church Street  
Jacksonville, Florida 32202-1139



January 7, 2000

Mr. Harry Francis  
Nocatee Utility Corporation  
4310 Pablo Oaks Court  
Jacksonville, Florida 32224

Reference: Nocatee Project Service Availability

Dear Mr. Francis:

This is in response to your request for availability letter dated December 6, 1999 for water, wastewater, and reuse services for the Nocatee project. JEA can provide service for all five phases of the project to meet the flow projections you provided in accordance with the attached agreement for wholesale water and wastewater services between JEA and D.D.I., Inc. dated April 14, 1999.

Please note that JEA is currently constructing a 24 inch water transmission line and a 20 inch sewer transmission line which will be immediately adjacent to the proposed Nocatee project on US 1. Additionally, please note that JEA is also constructing a 20 inch reuse transmission line to a point located at the intersection of US 1 and the JEA electric transmission easement located north of Old St. Augustine Road.

Please call me at (904) 665-4642 if you have any comments or questions concerning this availability letter. We look forward to working with you on this exciting project.

Sincerely,

  
Scott Kelly  
Vice President of Construction and Maintenance

Attachment

cc: Karl Hankin, JEA

**NOCATEE UTILITY CORPORATION**

4310 Pablo Oaks Court  
Jacksonville, Florida 32224

H. J. Skelton, President/Director  
Harry D. Francis, V.P./Secretary

December 6, 1999

Mr. Karl Hankin  
JEA  
21 W. Church Street  
Jacksonville, Florida 32202

Reference: Nocatee Project  
Service Availability

Dear Mr. Hankin:

We hereby request an availability letter for water, wastewater, and reuse water from JEA to Nocatee Utility Corporation for the Nocatee Project. We are assuming that JEA will be the wholesale provider (per the existing letter of intent) for all five phases of the project. The projected Average Daily Flows (ADF) are as follows:

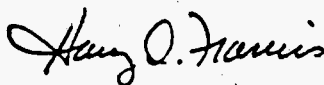
Phase	Water ADF (MGD)	Wastewater ADF (MGD)	Reuse* ADF (MGD)
Phase 1 (2002-2007)	0.729	0.614	1.228
Phase 2 (2007-2012)	1.111	0.941	0.840
Phase 3 (2012-2017)	1.494	1.285	1.352
Phase 4 (2017-2022)	1.422	1.213	1.341
Phase 5 (2022-2027)	1.365	1.156	0.629
Total	6.121	5.209	5.390

\* An additional 20% reuse demand will be provided by on-site stormwater.

Please respond to Mr. Douglas C. Miller, our utility engineer (at England, Thims and Miller, Inc., 14775 St. Augustine Road, Jacksonville, FL 32258) at your earliest convenience. If you have any questions or need additional information, please do not hesitate to call Mr. Miller at (904)642-8990.

Sincerely,

**NOCATEE UTILITY CORPORATION**



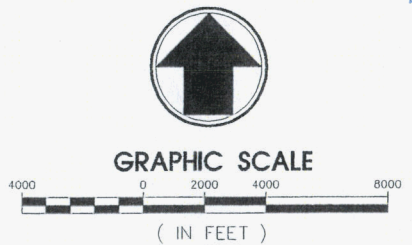
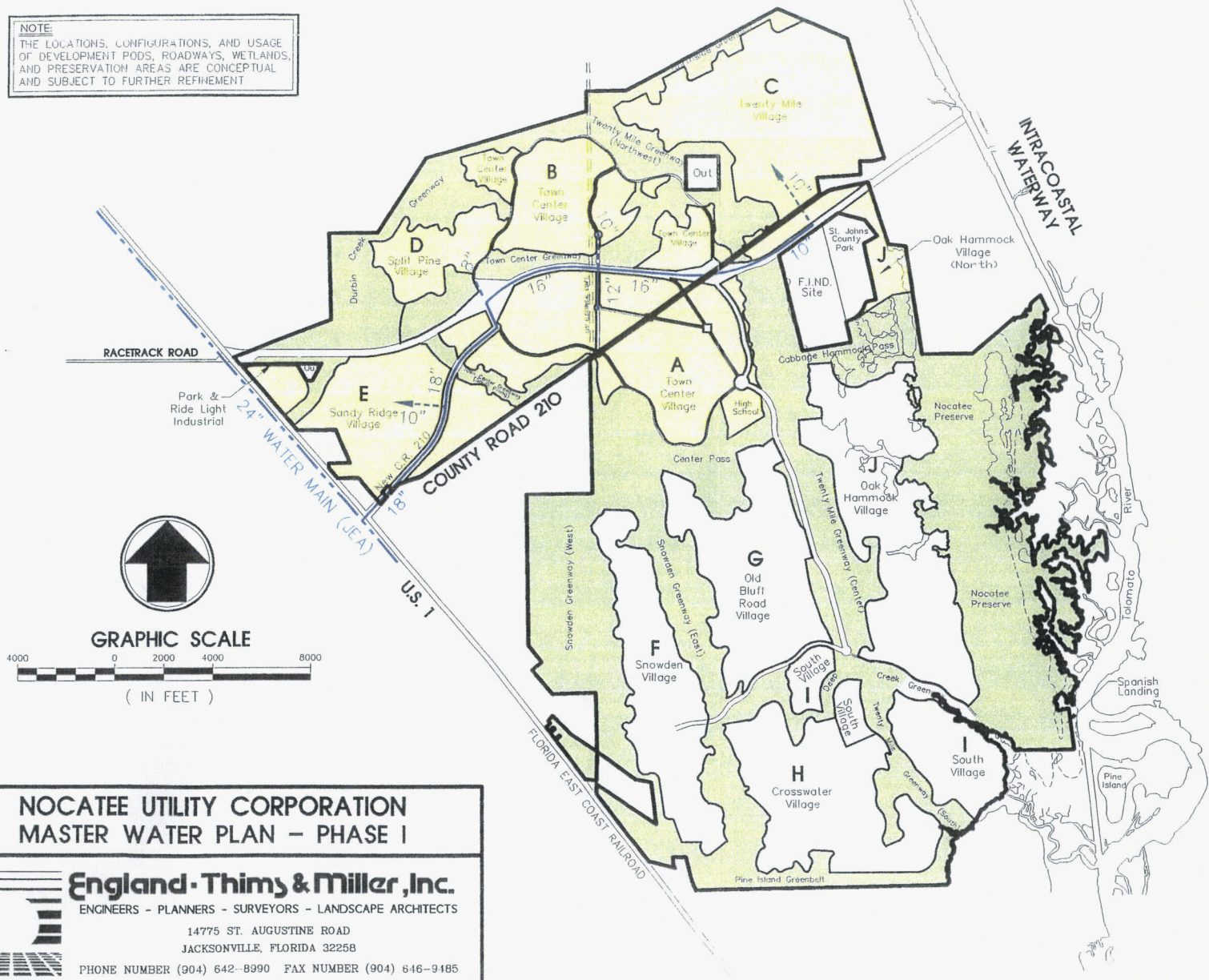
Harry D. Francis  
Vice President

cc: Scott Kelly



**NOTE:**  
 THE LOCATIONS, CONFIGURATIONS, AND USAGE OF DEVELOPMENT PODS, ROADWAYS, WETLANDS, AND PRESERVATION AREAS ARE CONCEPTUAL AND SUBJECT TO FURTHER REFINEMENT

LEGEND	
	PHASE I - UTILITY LINE
	PHASE I - DEVELOPER
	PHASE I - JEA
	PHASE I - DEVELOPMENT PODS
	GREENWAY
	DEVELOPMENT POD DESIGNATION



**NOCATEE UTILITY CORPORATION  
 MASTER WATER PLAN - PHASE I**

**England-Thimys & Miller, Inc.**  
 ENGINEERS - PLANNERS - SURVEYORS - LANDSCAPE ARCHITECTS

14775 ST. AUGUSTINE ROAD  
 JACKSONVILLE, FLORIDA 32258

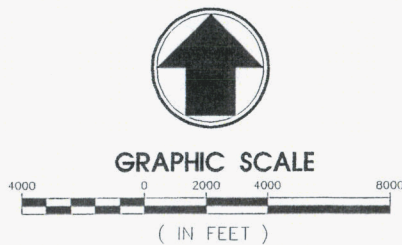
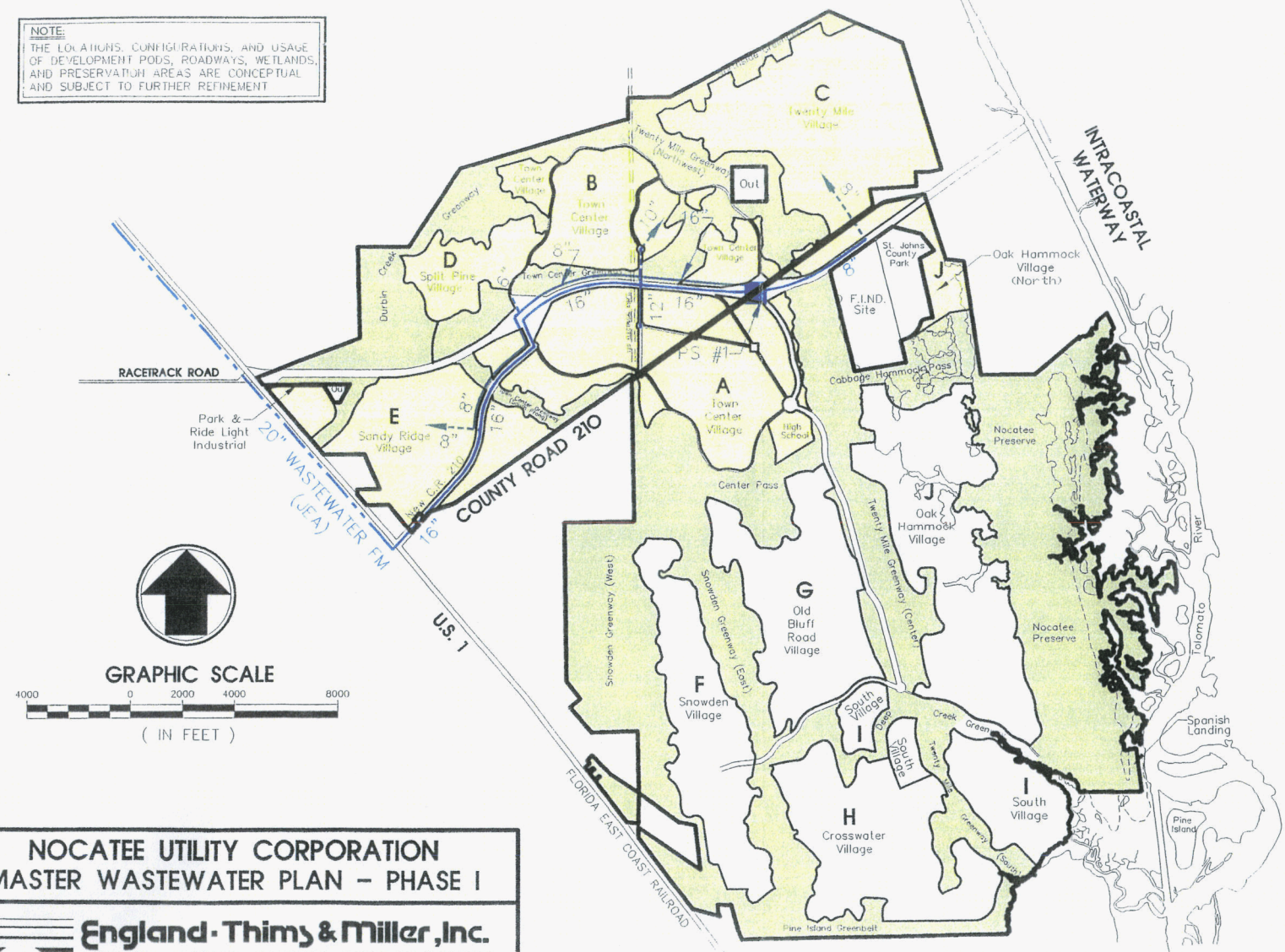
PHONE NUMBER (904) 642-8990 FAX NUMBER (904) 646-9485

DATE: FEBRUARY 9, 2000

**NOTE**  
 THE LOCATIONS, CONFIGURATIONS, AND USAGE OF DEVELOPMENT PODS, ROADWAYS, WETLANDS, AND PRESERVATION AREAS ARE CONCEPTUAL AND SUBJECT TO FURTHER REFINEMENT

**LEGEND**

- PHASE I - UTILITY LINE
- PHASE I - DEVELOPER
- PHASE I - JEA
- MASTER PUMP STATION
- PHASE I - DEVELOPMENT PODS
- GREENWAY
- DEVELOPMENT POD DESIGNATION



**NOCATEE UTILITY CORPORATION**  
**MASTER WASTEWATER PLAN - PHASE I**

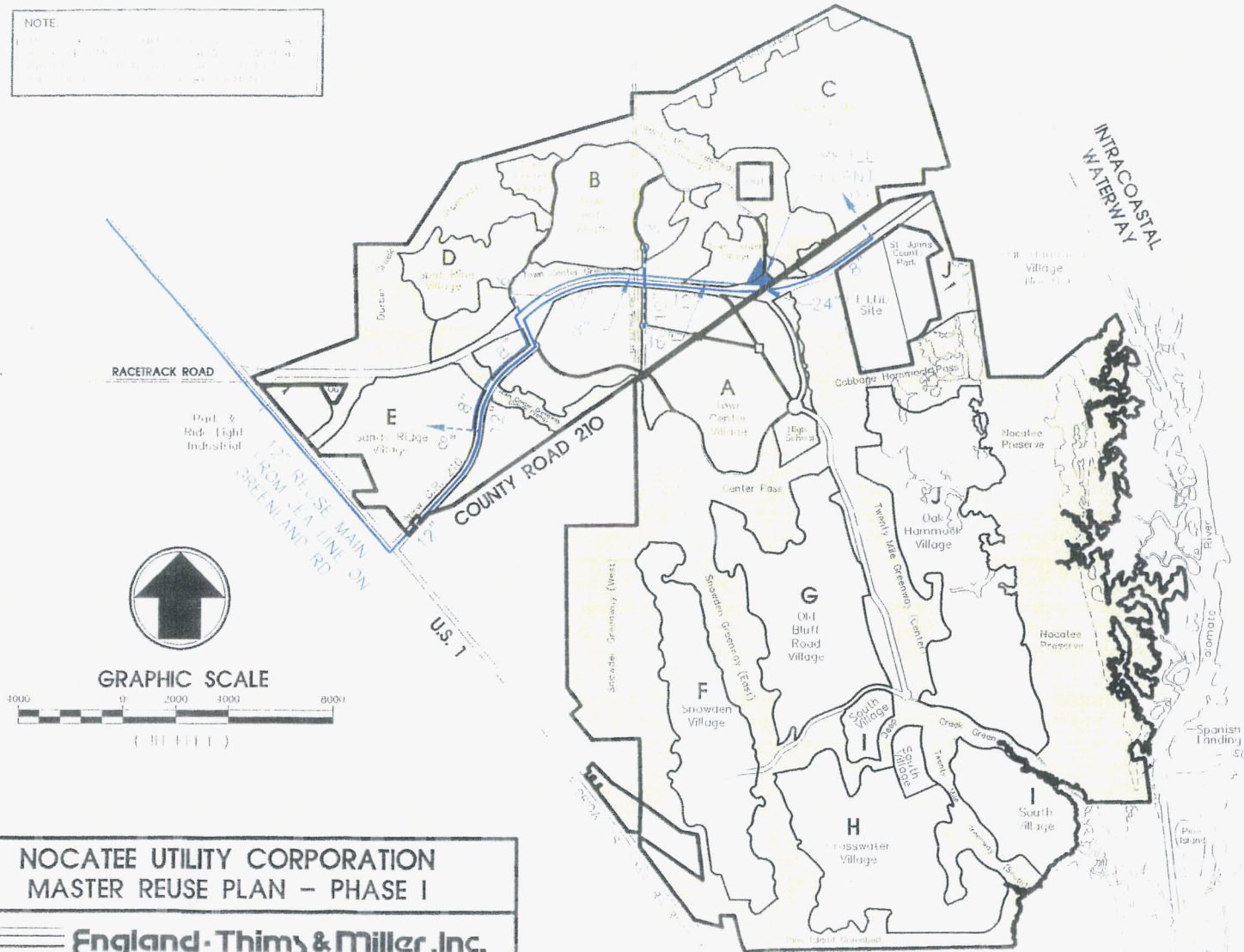
**England · Thimys & Miller, Inc.**  
 ENGINEERS - PLANNERS - SURVEYORS - LANDSCAPE ARCHITECTS  
 14775 ST. AUGUSTINE ROAD  
 JACKSONVILLE, FLORIDA 32258  
 PHONE NUMBER (904) 642-8990 FAX NUMBER (904) 646-9485

DATE: FEBRUARY 9, 2000

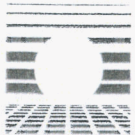
**NOTE:**  
 1. ALL REUSE AREAS SHOWN ON THIS PLAN ARE BASED ON THE 1998 AERIAL PHOTOGRAPHY.  
 2. ALL REUSE AREAS SHOWN ON THIS PLAN ARE BASED ON THE 1998 AERIAL PHOTOGRAPHY.  
 3. ALL REUSE AREAS SHOWN ON THIS PLAN ARE BASED ON THE 1998 AERIAL PHOTOGRAPHY.

**LEGEND**

- REUSE MAIN LINE
- REUSE BRANCH
- REUSE POINT
- REUSE AREA
- PROPERTY LINE
- ROAD
- WATERWAY
- FUTURE DEVELOPMENT
- EXISTING DEVELOPMENT
- A



**NOCATEE UTILITY CORPORATION  
 MASTER REUSE PLAN - PHASE I**

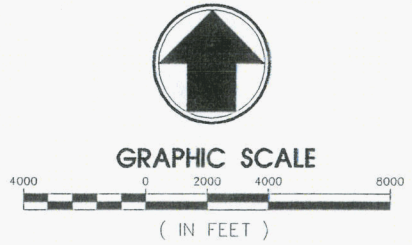
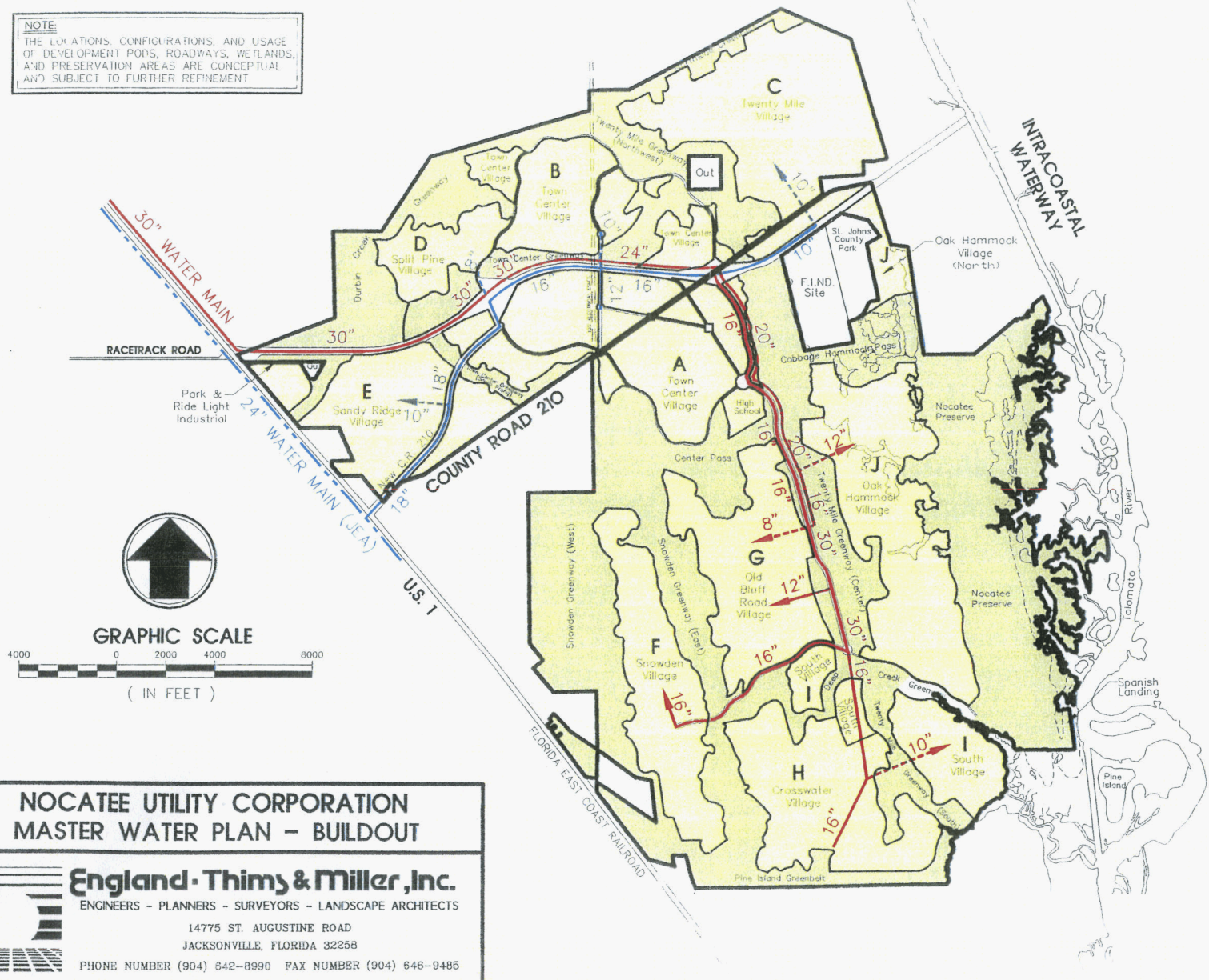


**England, Thimby & Miller, Inc.**  
 ENGINEERS - PLANNERS - SURVEYORS - LANDSCAPE ARCHITECTS  
 14776 ST AUGUSTINE ROAD  
 JACKSONVILLE, FLORIDA 32256  
 PHONE NUMBER (904) 842-0980 FAX NUMBER (904) 846-0485

DATE FEBRUARY 9 2000

**NOTE:**  
 THE LOCATIONS, CONFIGURATIONS, AND USAGE  
 OF DEVELOPMENT PODS, ROADWAYS, WETLANDS,  
 AND PRESERVATION AREAS ARE CONCEPTUAL  
 AND SUBJECT TO FURTHER REFINEMENT

LEGEND	
	PHASE I - UTILITY LINE
	PHASE I - DEVELOPER
	PHASE - JEA
	BUILDOUT - UTILITY LINE
	BUILDOUT - DEVELOPER
	PHASE I - DEVELOPMENT PODS
	GREENWAY
	DEVELOPMENT POD DESIGNATION



**NOCATEE UTILITY CORPORATION  
 MASTER WATER PLAN - BUILDOUT**

**England-Thimby & Miller, Inc.**  
 ENGINEERS - PLANNERS - SURVEYORS - LANDSCAPE ARCHITECTS

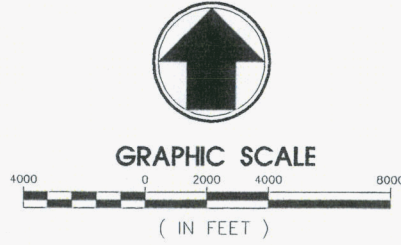
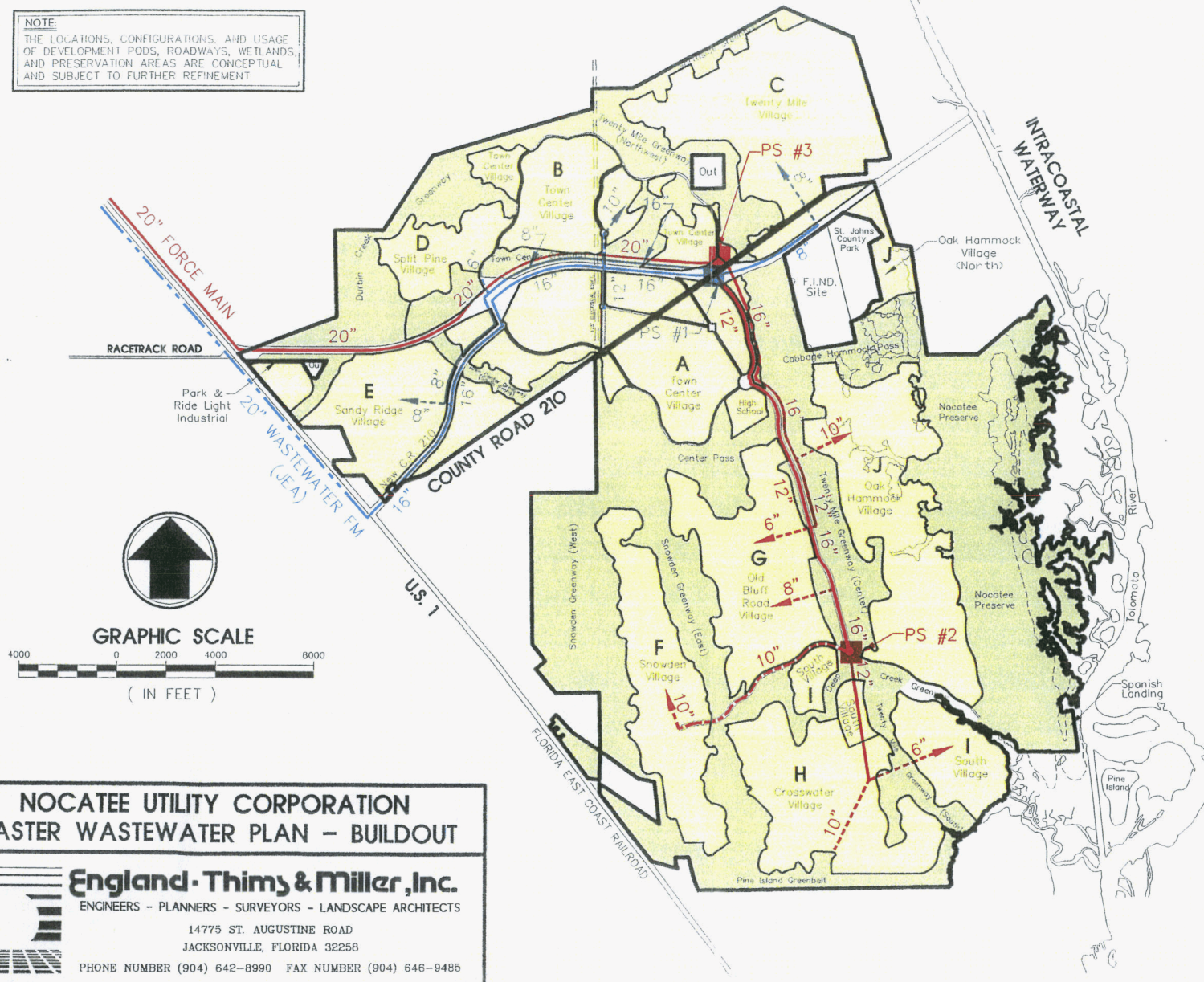
14775 ST. AUGUSTINE ROAD  
 JACKSONVILLE, FLORIDA 32258

PHONE NUMBER (904) 642-8990 FAX NUMBER (904) 646-9485

DATE: FEBRUARY 9, 2000

**NOTE**  
 THE LOCATIONS, CONFIGURATIONS, AND USAGE OF DEVELOPMENT PODS, ROADWAYS, WETLANDS, AND PRESERVATION AREAS ARE CONCEPTUAL AND SUBJECT TO FURTHER REFINEMENT

LEGEND	
	PHASE I - UTILITY LINE
	PHASE I - DEVELOPER
	PHASE I - JEA
	BUILDOUT - UTILITY LINE
	BUILDOUT - DEVELOPER
	PHASE I - MASTER PUMP STATION
	BUILDOUT - MASTER PUMP STATION
	PHASE I - DEVELOPMENT PODS
	GREENWAY
	DEVELOPMENT POD DESIGNATION



**NOCATEE UTILITY CORPORATION**  
**MASTER WASTEWATER PLAN - BUILDOUT**

**England · Thimby & Miller, Inc.**  
 ENGINEERS - PLANNERS - SURVEYORS - LANDSCAPE ARCHITECTS

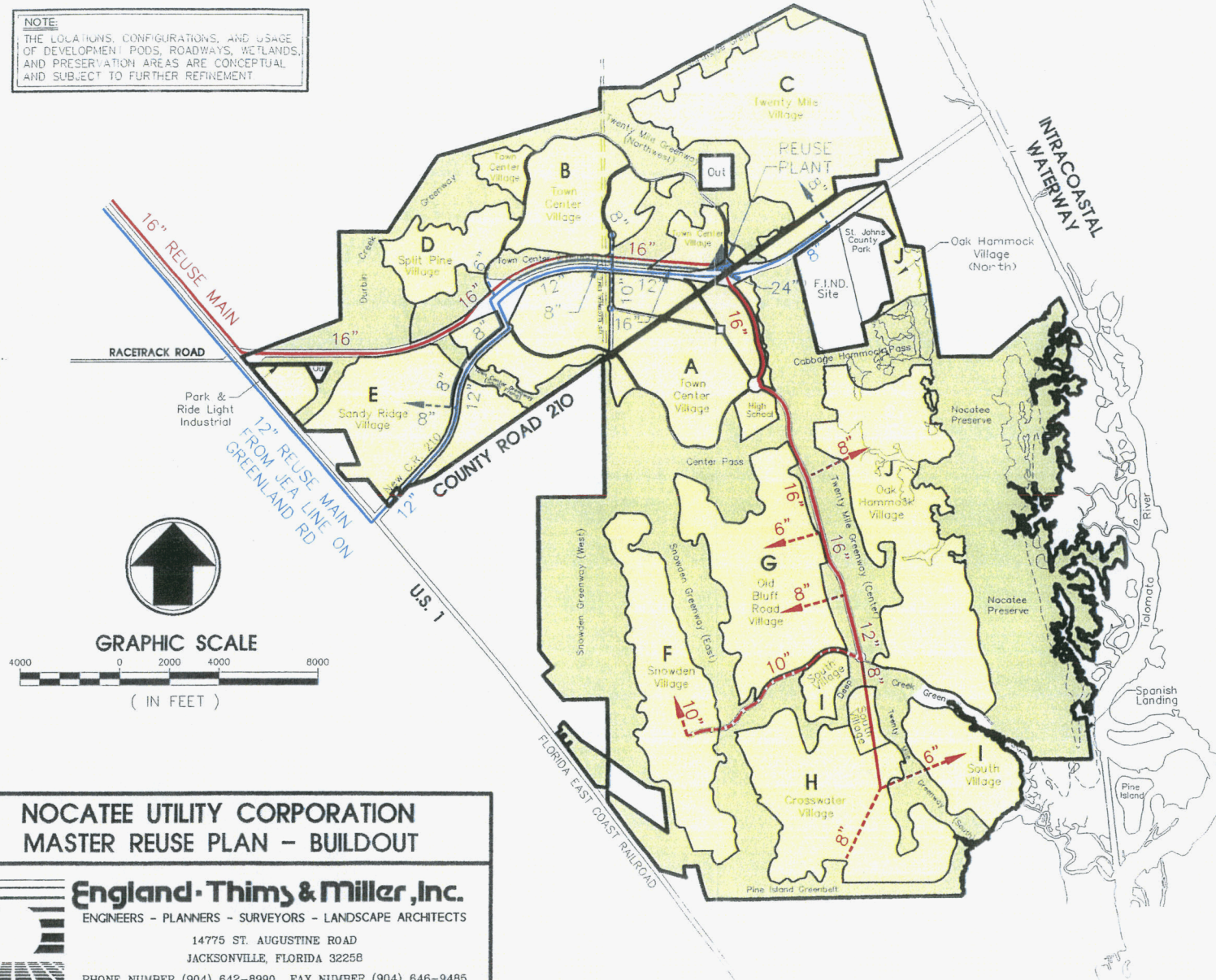
14775 ST. AUGUSTINE ROAD  
 JACKSONVILLE, FLORIDA 32258

PHONE NUMBER (904) 642-8990 FAX NUMBER (904) 646-9485

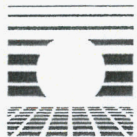
**NOTE:**

THE LOCATIONS, CONFIGURATIONS, AND USAGE OF DEVELOPMENT PODS, ROADWAYS, WETLANDS, AND PRESERVATION AREAS ARE CONCEPTUAL AND SUBJECT TO FURTHER REFINEMENT

LEGEND	
	PHASE - UTILITY LINE
	PHASE - DEVELOPER
	BUILDOUT - UTILITY LINE
	BUILDOUT - DEVELOPER
	REUSE PLANT
	PHASE - DEVELOPMENT PODS
	GREENWAY
<b>A</b>	DEVELOPMENT POD DESIGNATION



**NOCATEE UTILITY CORPORATION  
 MASTER REUSE PLAN - BUILDOUT**



**England-Thimby & Miller, Inc.**

ENGINEERS - PLANNERS - SURVEYORS - LANDSCAPE ARCHITECTS

14775 ST. AUGUSTINE ROAD  
 JACKSONVILLE, FLORIDA 32258

PHONE NUMBER (904) 642-8990 FAX NUMBER (904) 646-9485

DATE: FEBRUARY 9, 2000

**WATER FACILITY COST ESTIMATES  
PHASE 1**

Account Number	Account Description	Year 1 Additions	Year 2 Additions	Year 3 Additions	Year 4 Additions	Year 5 Additions	
301	Organization	\$0	\$0	\$0	\$0	\$0	
302	Franchises	\$0	\$0	\$0	\$0	\$0	
303	Land and Land Rights	\$0	\$0	\$0	\$0	\$0	
304	Structures and Improvements	\$0	\$0	\$0	\$0	\$0	
305	Collecting and Impounding Reservoirs	\$0	\$0	\$0	\$0	\$0	
306	Lake, River, and Other Intakes	\$0	\$0	\$0	\$0	\$0	
307	Wells and Springs	\$0	\$0	\$0	\$0	\$0	
308	Infiltration Galleries and Tunnels	\$0	\$0	\$0	\$0	\$0	
309	Supply Mains	\$0	\$0	\$0	\$0	\$0	
310	Power Generation Equipment	\$0	\$0	\$0	\$0	\$0	
311	Pumping Equipment	\$100,000	\$0	\$0	\$0	\$0	
320	Water Treatment Equipment	\$0	\$0	\$0	\$0	\$0	
330	Distribution Reservoirs and Standpipes	\$0	\$0	\$0	\$0	\$0	
	Steel Pneumatic Tank	\$0	\$0	\$0	\$0	\$0	
	Concrete Ground Storage Reservoir	\$0	\$0	\$0	\$0	\$0	
331	Transmission and Distribution Mains (Plant)	\$1,097,247	\$0	\$0	\$0	\$0	
331	Transmission and Distribution Mains (Developer Contributed)	\$527,379	\$348,922	\$348,922	\$348,922	\$348,922	
333	Services (Developer Contributed)	\$79,040	\$79,040	\$79,040	\$79,040	\$79,040	
334	Meters and Meter Installations (Developer Contributed)	\$50,600	\$50,600	\$50,600	\$50,600	\$50,600	
335	Hydrants (Developer Contributed)	\$83,720	\$83,720	\$83,720	\$83,720	\$83,720	
339	Other Plant and Miscellaneous Equipment	\$0	\$0	\$0	\$0	\$0	
340	Office Furniture and Equipment	\$10,000	\$0	\$0	\$0	\$0	
341	Transportation Equipment	\$0	\$0	\$0	\$0	\$0	
342	Stores Equipment	\$5,000	\$0	\$0	\$0	\$0	
343	Tools, Shop and Garage Equipment	\$0	\$0	\$0	\$0	\$0	
344	Laboratory Equipment	\$0	\$0	\$0	\$0	\$0	
345	Power Operated Equipment	\$0	\$0	\$0	\$0	\$0	
346	Communication Equipment	\$2,500	\$0	\$0	\$0	\$0	
347	Miscellaneous Equipment	\$0	\$0	\$0	\$0	\$0	
348	Other Tangible Plant	\$0	\$0	\$0	\$0	\$0	
		<b>\$1,955,486</b>	<b>\$562,282</b>	<b>\$562,282</b>	<b>\$562,282</b>	<b>\$562,282</b>	<b>\$4,204,614</b>

**WASTEWATER FACILITY COST ESTIMATES  
PHASE 1**

Account Number	Account Description	Year 1 Additions	Year 2 Additions	Year 3 Additions	Year 4 Additions	Year 5 Additions
351	Organization	\$0	\$0	\$0	\$0	\$0
352	Franchises	\$0	\$0	\$0	\$0	\$0
353	Land and Land Rights	\$0	\$0	\$0	\$0	\$0
354	Structures and Improvements	\$257,600	\$0	\$0	\$0	\$0
354	Structures and Improvements (Developer Contributed)	\$115,000	\$115,000	\$115,000	\$115,000	\$115,000
360	Collection Sewers - Force	\$1,426,074	\$0	\$0	\$0	\$0
360	Collection Sewers - Force (Developer Contributed)	\$202,716	\$87,906	\$87,906	\$87,906	\$87,906
361	Collection Sewers - Gravity (Developer Contributed)	\$527,183	\$527,183	\$527,183	\$527,183	\$527,183
362	Special Collecting Structures	\$0	\$0	\$0	\$0	\$0
363	Services to Customers (Developer Contributed)	\$96,980	\$96,980	\$96,980	\$96,980	\$96,980
364	Flow Measuring Devises	\$50,000	\$0	\$0	\$0	\$0
365	Flow Measuring Installations	\$0	\$0	\$0	\$0	\$0
370	Receiving Wells	\$0	\$0	\$0	\$0	\$0
371	Pumping Equipment	\$386,400	\$0	\$0	\$0	\$0
371	Pumping Equipment (Developer Contributed)	\$172,500	\$172,500	\$172,500	\$172,500	\$172,500
380	Treatment and Disposal Equipment	\$0	\$0	\$0	\$0	\$0
381	Plant Sewers	\$0	\$0	\$0	\$0	\$0
382	Outfall Sewer Lines	\$0	\$0	\$0	\$0	\$0
389	Other Plant and Miscellaneous Equipment	\$0	\$0	\$0	\$0	\$0
390	Office Furniture and Equipment	\$10,000	\$0	\$0	\$0	\$0
391	Transportation Equipment	\$0	\$0	\$0	\$0	\$0
392	Stores Equipment	\$5,000	\$0	\$0	\$0	\$0
393	Tools, Shop and Garage Equipment	\$0	\$0	\$0	\$0	\$0
394	Laboratory Equipment	\$0	\$0	\$0	\$0	\$0
395	Power Operated Equipment	\$0	\$0	\$0	\$0	\$0
396	Communication Equipment	\$2,500	\$0	\$0	\$0	\$0
397	Miscellaneous Equipment	\$0	\$0	\$0	\$0	\$0
398	Other Tangible Plant	\$0	\$0	\$0	\$0	\$0
		<b>\$3,251,953</b>	<b>\$999,569</b>	<b>\$999,569</b>	<b>\$999,569</b>	<b>\$999,569</b>
						<b>\$7,250,229</b>



**REUSE FACILITY COST ESTIMATES  
PHASE 1**

Account Number	Account Description	Year 1 Additions	Year 2 Additions	Year 3 Additions	Year 4 Additions	Year 5 Additions
351	Organization	\$0	\$0	\$0	\$0	\$0
352	Franchises	\$0	\$0	\$0	\$0	\$0
353	Land and Land Rights	\$0	\$0	\$0	\$0	\$0
354	Structures and Improvements	\$0	\$0	\$0	\$0	\$0
360	Collection Sewers - Force	\$2,712,786	\$0	\$0	\$0	\$0
360	Collection Sewers - Force (Developer Contributed)	\$405,093	\$229,897	\$229,897	\$229,897	\$229,897
361	Collection Sewers - Gravity	\$0	\$0	\$0	\$0	\$0
362	Special Collecting Structures	\$0	\$0	\$0	\$0	\$0
363	Services to Customers (Developer Contributed)	\$69,920	\$69,920	\$69,920	\$69,920	\$69,920
364	Flow Measuring Devises	\$32,200	\$0	\$0	\$0	\$0
364	Flow Measuring Devises (Developer Contributed)	\$22,770	\$22,770	\$22,770	\$22,770	\$22,770
365	Flow Measuring Installations (Developer Contributed)	\$22,770	\$22,770	\$22,770	\$22,770	\$22,770
370	Receiving Wells	\$0	\$0	\$0	\$0	\$0
371	Pumping Equipment	\$648,687	\$0	\$0	\$0	\$0
380	Treatment and Disposal Equipment	\$1,016,798	\$0	\$0	\$0	\$0
381	Plant Sewers	\$0	\$0	\$0	\$0	\$0
382	Outfall Sewer Lines	\$0	\$0	\$0	\$0	\$0
389	Other Plant and Miscellaneous Equipment	\$0	\$0	\$0	\$0	\$0
390	Office Furniture and Equipment	\$0	\$0	\$0	\$0	\$0
391	Transportation Equipment	\$0	\$0	\$0	\$0	\$0
392	Stores Equipment	\$0	\$0	\$0	\$0	\$0
393	Tools, Shop and Garage Equipment	\$0	\$0	\$0	\$0	\$0
394	Laboratory Equipment	\$0	\$0	\$0	\$0	\$0
395	Power Operated Equipment	\$0	\$0	\$0	\$0	\$0
396	Communication Equipment	\$0	\$0	\$0	\$0	\$0
397	Miscellaneous Equipment	\$0	\$0	\$0	\$0	\$0
398	Other Tangible Plant	\$0	\$0	\$0	\$0	\$0
		<b>\$4,931,024</b>	<b>\$345,357</b>	<b>\$345,357</b>	<b>\$345,357</b>	<b>\$345,357</b>
						<b>\$6,312,452</b>

HOPPING GREEN SAMS & SMITH

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

FAX (850) 425-3415

Writer's Direct Dial No.

(850) 425-2313

February 11, 2000

GARY V. PERKO  
MICHAEL P. PETROVICH  
DAVID L. POWELL  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPLE  
DOUGLAS S. ROBERTS  
GARY P. SAMS  
TIMOTHY G. SCHOENWALDER  
ROBERT P. SMITH  
DAN R. STENGLE  
CHERYL G. STUART  
W. STEVE SYKES  
T. KENT WETHERELL, II

RECEIVED-PPSC  
FEB 11 PM 4:18  
RECORDS AND REPORTING  
OF COUNSEL  
LIZABETH C. BOWMAN

JAMES S. ALVES  
BRIAN H. BIBEAU  
RICHARD S. BRIGHTMAN  
KEVIN B. COVINGTON  
PETER C. CUNNINGHAM  
RALPH A. DeMEO  
RANDOLPH M. GIDDINGS  
WILLIAM H. GREEN  
WADE L. HOPPING  
GARY K. HUNTER, JR.  
JONATHAN T. JOHNSON  
ROBERT A. MANNING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
ANGELA R. MORRISON  
GABRIEL E. NIETO  
ERIC T. OLSEN

BY HAND DELIVERY

ORIGINAL

Blanca Bayó  
Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Re: Application of Nocatee Utility Corporation -- Docket  
No. 990696-WS (and Consolidated Docket No. 992040-WS)

Dear Ms. Bayó:

Enclosed for filing on behalf of Nocatee Utility Corporation  
in Docket No. 990696-WS are the original and fifteen copies of  
the following:

- 1) Nocatee's Supplement and Amendment to Certificate  
Application. 01877-00
- 2) Direct testimony and exhibits of H. Jay Skelton,  
Douglas C. Miller, and Deborah D. Swain.

By copy of this letter, these documents have been furnished  
to the parties on the attached service list. If you have any  
questions regarding this filing, please call.

Very truly yours,

*Richard D. Melson*

Richard D. Melson

RDM/mee  
Enclosures  
cc: Certificate of Service

RECEIVED & FILED

*Mee*  
FPSC-BUREAU OF RECORDS

AFA  
APP  
CAF  
CMU  
CTR  
EAG  
LEG  
MAS  
OPC  
RRR  
SEC  
VAV  
OTH

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served this 11th day of February, 2000, on the following:

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

By Hand Delivery

John L. Wharton  
Marshall Deterding  
Rose, Sundstrom & Bentley, LLP  
2548 Blairstone Pines Drive  
Tallahassee, FL 32301

By Hand Delivery

Kenneth Hoffman  
J. Stephen Menton  
Rutledge, Ecenia, Purnell  
& Hoffman, P.A.  
P.O. Box 551  
Tallahassee, FL 32302

By U.S. Mail

Suzanne Brownless  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, FL 32301

By U.S. Mail



---

Attorney