BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Application for Original Certificate of Authorization and Initial Rates and Charges for Water and Wastewater Service in Duval, Baker and Nassau Counties, Florida by FIRST COAST REGIONAL UTILITIES, INC. DOCKET NO. 20190168-WS

FILED:

JEA'S REQUEST FOR ORAL ARGUMENT ON JEA'S MOTION FOR SUMMARY FINAL ORDER

JEA, pursuant to rule 25-22.0022, Florida Administrative Code, requests oral argument on JEA's Motion for Summary Final Order, filed on September 8, 2020. JEA's Motion for Summary Final Order is a dispositive motion raising pure issues of law relating to the Commission's authority to issue a water and wastewater utility certificate of authorization to Applicant First Coast Regional Utilities, Inc. in portions of Duval County (within the municipal boundaries of the City of Jacksonville) and Nassau County where JEA has previously been given exclusive franchises to provide such service by the City of Jacksonville, and by Nassau County when it was a non-jurisdictional county. Because of the unique legal issues involved, oral argument may aid the Commission in understanding and evaluating the issues to be decided, and would provide an opportunity for the Commission to ask any questions they may have of the parties. Ten (10) minutes per side is requested.

Respectfully submitted this 8th day of September, 2020.

<u>/s/ Thomas A. Crabb</u> Thomas A. Crabb Florida Bar No. 25846 Susan F. Clark Florida Bar No. 179580 Radey Law Firm 301 South Bronough Street, Suite 200 Tallahassee, FL 32301

(850) 425-6654 tcrabb@radeylaw.com sclark@radeylaw.com

Attorneys for JEA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail

to the following this 8th day of September, 2020.

Melinda Watts Bianca Lherisson Jennifer Crawford Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 mwatts@psc.state.fl.us BLheriss@psc.state.fl.us jcrawfor@psc.state.fl.us

Office of Public Counsel J.R. Kelly Mireille Fall-Fry The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399 fall-fry.mireille@leg.state.fl.us Kelly.jr@leg.state.fl.us William E. Sundstrom Robert C. Brannan Sundstrom & Mindlin, LLP 2548 Blairstone Pines Drive Tallahassee, FL 32301 wsundstrom@sfflaw.com rbrannah@sfflaw.com

John L. Wharton Dean Mead and Dunbar 215 South Monroe Street, Suite 815 Tallahassee, FL 32301 jwharton@deanmead.com hschack@deanmead.com

/s/ Thomas A. Crabb