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STATE OF FLORIDA



DIVISION OF ENGINEERING
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Public Service Commission

December 10, 2025

Mr. F. Marshall Deterding
Mr. William E. Sundstrom, P.A.
Sundstrom & Mindlin, LLP
2548 Blainstone Pines Drive
Tallahassee, FL 32301
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SECOND DEFICIENCY LETTER VIA EMAIL

Re: Docket No. 20250125-WS - Application for amendment of Certificate Nos. 680-W and 578-S for water and wastewater service territories in Duval, Baker, and Nassau Counties, by First Coast Regional Utilities, Inc.

Dear Messrs. Deterding and Sundstrom:

Staff has reviewed First Coast Regional Utilities, Inc.'s response to staff's October 30, 2025, deficiency letter. After reviewing this information, we find the application to still be deficient. The specific deficiencies are identified as:

1. **Legal Description.** Rule 25-30.036(2)(f), Florida Administrative Code (F.A.C.), states that the applicant shall provide a legal description of the territory proposed to be served, in the format prescribed in Rule 25-30.029, F.A.C. Rule 25-30.029(2)(b), F.A.C., states that the description may reference interstates, state roads, local streets, and major bodies of water, but shall not rely on references to government lots, recorded plats or lots, tracts, or other recorded instruments. The legal description provided in response to staff's first deficiency letter includes references to government lots, recorded plats or lots, tracts or other recorded instruments. Also, Rule 25-30.029(2)(b)(2), F.A.C., states that the perimeter shall be described by traversing the service area boundary and closing at the point of beginning, and that the description shall identify all bearings and distances necessary to provide continuous description. The legal description provided in response to staff's first deficiency letter does not describe the circumnavigation of the territory to be served. Please provide a legal description that meets the format requirements of Rule 25-30.029(2)(b), F.A.C., and is a singular continuous legal description for the perimeter of the proposed territory. The legal description should correlate with the Utility's territory and system maps.

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Your application will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than **Friday, January 9, 2026**, to the following address:

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Should you have any questions concerning the information in this letter, please feel free to contact either Orlando Wooten by phone at (850) 413-6686 or email at owooten@psc.state.fl.us, or Phillip Ellis by phone at (850) 413-6626 or email at pellis@psc.state.fl.us, for technical questions, or Saad Farooqi by phone at (850) 413-6214 or email at sfarooqi@psc.state.fl.us for legal questions. Please include the docket number on all submissions to the Commission Clerk.

Sincerely,

s/ Phillip Ellis

Phillip Ellis
Public Utilities Supervisor
Division of Engineering

PE:ow:da

cc: Office of Commission Clerk (Docket No. 20250125-WS)