

SUNDSTROM LAW

ATTORNEYS | COUNSELORS



February 11, 2026

Elisabeth Draper, Director
Florida Public Service Commission
Division of Economics
edraper@psc.state.fl.us

Re: Docket No. 20260012; First Coast Regional Utilities, Inc.; Application for Revised Service Availability Charges and Policy
Response to Deficiency Letter of February 5, 2026

Dear Ms. Draper,

Our client, First Coast Regional Utilities, Inc. acknowledges your letter of February 5, 2026 relative to the above application, a copy of which is attached for your ready reference.

Attached please find a letter from the engineering firm of England-Thims & Miller of Jacksonville which replies to your three inquiries on a point-by-point basis.

Should you have any questions or comments concerning the above, please do not hesitate to contact me.

Sincerely,

SUNDSTROM LAW, LLC

/s/ F. Marshall Deterding

F. Marshall Deterding
Of Counsel

FMD/brf

Enclosure

cc: Terrence Bethea (tbethea@psc.state.fl.us)
Saad Farooqi (sfarooqi@psc.state.fl.us)



February 10, 2026

Officers and Directors
First Coast Regional Utilities, Inc.
P.O. Box 238
Lake Butler, Florida 32054

**RE: First Coast Regional Utilities, Inc., Florida Public Service Commission
Docket No. 20260012-WS Application for Revised Service Availability Charges and
Policy for Water and Wastewater Services in Duval, Baker and Nassau Counties by
First Coast Regional Utilities, Inc.**

To the Officers and Directors of First Coast Regional Utilities:

England-Thims & Miller, Inc. is the Consulting Engineering firm for First Coast Regional Utilities, Inc., relative to its overall planning activities and related matters. In that regard, attached are responses to the three questions posed by the staff of the Public Service Commission in its "deficiency letter" dated February 5, 2026.

These responses are based on design parameters and information available at the writing of this response.

Sincerely,

England-Thims & Miller, Inc.

Bradley L. Weeber, PE
Executive Vice President



1. Definition of ERC consistent with 25-30.515(8)

F.A.C.

Average annual demand projections were developed using the projected development absorption. The projected number of units or floor area for each land use was multiplied by its respective flow rate to estimate total water demand. The resulting flows are presented in terms of average annual daily flow (AADF) is shown below.

	<u>GPD/ERC</u>
Water	210
Wastewater	200
Reclaimed Water	300

2. Treatment Plant Design Capacity using ERCs

	<u>Capacity</u>	<u>GPD/ERC</u>	<u># ERC</u>
Water Treatment Plant	1,000,000	210	4,762
Wastewater Treatment Plant	300,000	200	1,500

3. Distribution & Collection Capacity definition

The initial distribution & collection pipelines into and out of the plant are; 16" Watermain, 12" Forcemain, and 12" Reuse Main. They can accommodate the below ERCs.

	<u># ERCs</u>
Water Distribution	3210
Wastewater Collection	3210
Reclaimed Water	1287

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DIVISION OF ECONOMICS
ELISABETH J. DRAPER
DIRECTOR
(850) 413-6410

Public Service Commission

February 5, 2026

F. Marshall Deterding
William E. Sundstrom, P.A.
Sundstrom Law, LLC.
2548 Blairstone Pines Drive
Tallahassee, Fl. 32301
mdeterding@sfflaw.com
wsundstrom@sfflaw.com

Re: Docket No. 20260012-WS - Application for revised service availability charges and policy for water and wastewater service in Duval, Baker, and Nassau Counties, by First Coast Regional Utilities, Inc.

Dear Mr. Deterding:

Staff has reviewed the application for revised service availability charges and policy for water and wastewater service submitted on January 6, 2026, on behalf of First Coast Regional Utilities, Inc. (FCRU or Utility). After reviewing this information, we find that the application to be deficient. The specific deficiencies are identified below:

1. Equivalent Residential Connections (ERCs). Rule 25-30.565(g), Florida Administrative Code (F.A.C.), requires the utility to provide the number of ERCs as defined by 25-30.515(8), F.A.C. Exhibit A does not describe how an ERC is defined consistent with 25-30.515(8), F.A.C., which requires either (a) 350 gallons per day (gpd), (b) a demonstration of the gpd for the average daily flow of a single residential unit, or (c), the gpd approved by the Department of Environmental Protection for a single residential unit. Staff notes the value originally used in Order No. PSC-2022-0193-FOF-WS in Docket No. 20190168-WS was 270 gpd for water and 216 gpd for wastewater. Please describe the method by which an ERC is defined consistent with 25-30.515(8), F.A.C.
2. Treatment Capacity. Rule 25-30.565(h), F.A.C., requires the utility to provide the capacity of the treatment system in terms of ERCs. As 25-30.565(g) is deficient, the capacity of the treatment system in terms of ERCs cannot be determined. Please provide a revised statement using the ERC calculation consistent with 25-30.515(8) and 25-30.565(g), F.A.C.

F. Marshall Deterding

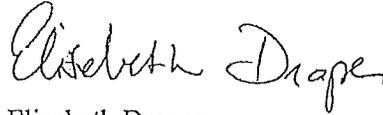
Page 2

February 5, 2026

3. Distribution & Collection Capacity. Rule 25-30.565(i), F.A.C., requires the utility to provide the capacities of the distribution and collection systems in terms of ERCs. As 25-30.565(g) is deficient, the capacities of the distribution and collection systems in terms of ERCs cannot be determined. Please provide a revised statement using the ERC calculation consistent with 25-30.515(8) and 25-30.565(g), F.A.C.

If you have any technical questions, please contact Terence Bethea by phone at (850) 413-6435 or by email at Tbethea@psc.state.fl.us. If you have any legal questions, please contact Saad Farooqi by phone (850) 413-6214 or by email at SFarooqi@psc.state.fl.us.

Sincerely,



Elisabeth Draper
Director

ED:tb

cc: Office of Commission Clerk (Docket No. 20260012-WS)