SUNDSTROM LAW
ATTORNEYS | COUNSELORS

February 25, 2026

Takira T. Thompson
Engineering Specialist
Florida Public Service Commission
tthompson@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 18, 2026

Dear Ms. Thompson,

We are in receipt of your request of February 18th in the above-referenced docket to provide supporting documentation or calculations demonstration how each of the GPD/ERC values provided for water, wastewater and reclaimed were derived. In response to that request, please find the attached letter from the engineering firm of England-Thims & Miller signed by Bradley L. Weeber, PE, Executive Vice President of that firm

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

cc: Terrence Bethea (tbethea@psc.state.fl.us)
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February 25, 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. - Methodology

To the Officers and Directors of First Coast Regional Utilities:

Below was the methodology used for determining the Gallons Per Day (GPD)/Equivalent Residential Connection (ERC) values.

Water

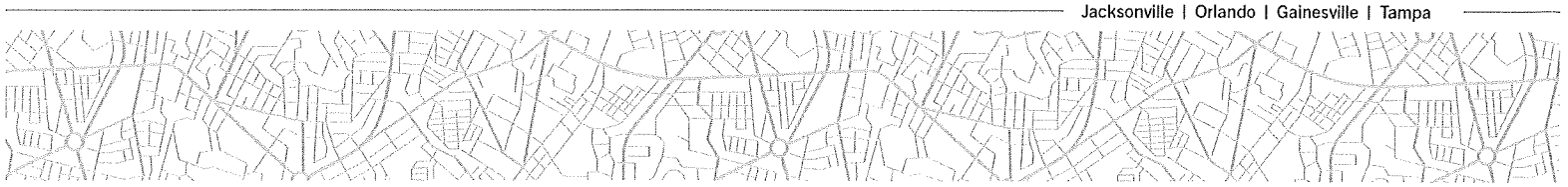
210 GPD/ERC was used for this project. This value is supported by several sources.

1. Report: USGS Water Withdrawals, Uses, and Trends in Florida, 2015
    1. Found here: https://pubs.usgs.gov/sir/2019/5147/sir20195147.pdf
    2. These reports show that water usage per capita has been decreasing over time due to plumbing/fixture efficiency, regulatory oversight, etc.
    3. Current average per capita water demand is 85 GPD. (with some areas in Florida in the 50's)
2. The St. Johns River Water Management District also encouraged per capita rates of 80-85 GPD during the Consumptive Use Permitting (CUP) Process.

Duval County demographic information shows the average household occupancy as 2.45 persons per household.
85 GPD x 2.45 = 208.25 GPD/ERC (rounded up to 210 GPD/ERC)

Sewer

Utilities typically see sewage rates of approximately 90% of domestic water supply rates in modern subdivisions. This was rounded up to 200 GPD/ERC.



Reuse/Irrigation

Reuse/Irrigation water demands per ERC vary greatly depending on yard size, irrigation water cost, landscape, soil type, and other factors. To determine the ERC rate for this project we reviewed the surrounding utilities reuse usage. We determined that this master planned community would be most like the nearby St. Johns County Utility Department (SJCUD) because it serves the most master planned communities similar to this project. SJCUD uses 300 GPD/ERC as can be seen on their Availability Request form online.

Additionally, this project plans to incorporate water conservation best management practices as part of their required covenants and restrictions for the master planned community. These Best Management Practices (BMPs) are intended to keep the irrigation rates at or below 300 GPD/ERC. These BMPs may include:

1. Limitation on turf square footage
2. Limitations on plant selection
3. Soil amendments to retain moisture
4. High efficiency irrigation requirements

Note: These calculations differ from those in the original application several years ago as those were very preliminary. When that planning phase evolved to design and permitting, more analysis was done to determine household demands.

Sincerely,

England-Thims & Miller, Inc.

Bradley L. Weeber, PE
Executive Vice President