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July 29, 2026

VIA ELECTRONIC FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20260095-WS
Application for transfer of majority organizational control of First Coast Regional Utilities, Inc., holder of water Certificate No. 680-W and wastewater Certificate No. 578-S in Duval, Baker, and Nassau Counties, from Roberts Utility Holdings, LLC to Florida Water Holdings, Inc.

Dear Mr. Teitzman:

Here are Florida Water Holdings, Inc.'s responses to the Commission's deficiency letter dated July 24, 2026:

1. **Notice of Application.** Rule 25-30.037(4)(b), Florida Administrative Code (F.A.C.), requires the applicant to provide proof of noticing, pursuant to Rule 25-30.030, F.A.C. Rule 25-30.030(6), F.A.C., states that all applications requiring noticing shall be deemed deficient until affidavits of noticing required by Sections 367.045(1)(e) and (2)(f), Florida Statutes, along with a copy of the notice, are filed with the Office of Commission Clerk. Staff notes that the Utility cannot correct this deficiency until its draft notice has been approved by staff and has been issued in accordance with Rule 25-30.030(5), F.A.C. However, staff is working with the Utility toward approval of the draft notice. Upon staff approval of the Utility's draft notice and issuance of the same, please provide proof of noticing, pursuant to Rule 25-30.030, F.A.C.

   Response:

Upon staff approval of our draft notice, the Company will issue the notice to customers and provide proof of noticing pursuant to Rule 25-30.030, Florida Administrative Code.

2. **Ownership.** Rule 25-30.037(4)(d), F.A.C., requires that the applicant provide a description of the ownership transfer, including the date the transfer occurred or will occur and a description of the resulting ownership interests in the Utility. The description of ownership provided in the application is not sufficient to demonstrate the complete ownership structure before the proposed transfer. Please provide a comprehensive description and organizational chart, if applicable, identifying all direct and indirect owners, the percentage of ownership held by each owner, the effective date(s) of any ownership changes, and the ownership relationships among all parent companies, subsidiaries, and affiliated entities both prior to and following the proposed transaction. The response should clearly identify the ultimate controlling entity and demonstrate how ownership will change as a result of the proposed transfer.

Response:

FIRST COAST REGIONAL UTILITIES – OWNERSHIP INTERESTS

1. **Commission Certification.** On May 25, 2022, the Florida Public Service Commission (the "Commission") approved First Coast Regional Utilities, Inc.'s ("FCRU") application for water and wastewater service.[1] At the time of certification, the sole shareholder of FCRU was 301 Capital Partners, LLC ("301 Capital"), which held 1,000 shares, or 100 percent, of the issued and outstanding stock of FCRU. Members of the Roberts family held 60.7 percent of the member interests in 301 Capital, and the remaining 39.3 percent of the member interests were held by Robert C. Kennelly, Michael E. Braren, James A. Hissam, and John F. White, Jr.

2. **Corporate Conversion.** On March 1, 2023, the member interests of 301 Capital in FCRU were converted identically to individual shareholdings in FCRU, with the effect that each 301 Capital member became a direct shareholder of FCRU holding a percentage of FCRU stock identical to that member's percentage member interest in 301 Capital. FCRU reported this transaction to the Commission by letter dated October 22, 2025, filed in Docket No. 20250125-WS.[2] As explained in that letter, the reclassification resulted in a tax efficient recognition of member interests of 301 Capital. The Roberts family owned 60.67 percent of the utility before and after the transaction, the change did not involve a transfer of majority organizational control, so Commission approval was not required.

[1] *See* Order No. PSC-2022-0193-FOF-WS, issued May 25, 2022, in Docket No. 20190168-WS (*Application for water and wastewater service, by First Coast Regional Utilities, Inc.*)
[2] *See* DN 14741-2025, filed October 22, 2025, in Docket No. 20250125-WS (*Application for amendment of Certificate Nos. 680-W and 578-S, by First Coast Regional Utilities, Inc.*)

Immediately following the conversion, the issued and outstanding stock of FCRU was held as follows:

Shareholder	Shares Owned	Percentage
Avery C. Roberts*	455.363064	45.54%
C. Austen Roberts*	129.259542	12.93%
Twyla J. Roberts*	16.667102	1.67%
Amber Roberts Crawford*	5.380292	0.54%
Robert C. Kennelly	78.290000	7.83%
Michael E. Braren	78.290000	7.83%
James A. Hissam	78.290000	7.83%
John F. White, Jr.	158.460000	15.85%
TOTAL	1,000.000000	100.00%

* The four Roberts shareholders collectively held 606.670000 shares, or 60.67 percent, of the issued and outstanding stock, and accordingly held majority organizational control of FCRU both *before* and *after* this reorganization.

3. **Stock Redemption and Reallocation.** On March 16, 2026, shareholders Robert C. Kennelly, Michael E. Braren, James A. Hissam, and John F. White, Jr. redeemed their FCRU stock. No additional shares of stock were issued. As a result, the total number of shares outstanding was reduced from 1,000 to **606.67**, and 100 percent of the ownership of FCRU remained in the Roberts family. Majority organizational control did not change.

On the same date, and as part of the same transaction, 133.820631 shares were transferred from Avery C. Roberts to C. Austen Roberts. Immediately following these events, the issued and outstanding stock of FCRU was held as follows:

Shareholder	Shares Owned	Percentage
Avery C. Roberts	321.542433	53.00%
C. Austen Roberts	263.080173	43.36%
Twyla J. Roberts	16.667102	2.75%
Amber Roberts Crawford	5.380292	0.89%
TOTAL	606.670000	100.00%

4. **Stock Transfer to Roberts Utility Holdings, LLC.** On June 15, 2026, the four individual shareholders identified in Paragraph 3 above contributed and transferred all of the issued and outstanding stock of FCRU to Roberts Utility Holdings, LLC (“RUH”). RUH thereby became the sole and direct owner of 606.670000 shares, or 100 percent,

of the issued and outstanding stock of FCRU. The owners of RUH are the same as the owners of FCRU. 100 percent of RUH's ownership remains in the Roberts family and majority organizational control did not change.

5. **Stock Purchase by Florida Water Holdings.** On June 17, 2026, Florida Water Holdings, Inc. ("FWH") and RUH executed a Stock Purchase Agreement ("Agreement")[3] authorizing FWH's purchase of all the issued and outstanding stock (606.67 shares) of FCRU from RUH upon the terms and subject to the conditions set forth in that Agreement. Pursuant to Article 3.1 of the Agreement, closing will occur within 30 days after the satisfaction or waiver of all conditions specified in Article 7, which includes Commission approval of the proposed transfer. This transfer will result in a change of majority organizational control and is the subject of the petition in this docket.

FLORIDA WATER HOLDINGS, INC. OWNERSHIP INTERESTS

FWH is an indirectly owned subsidiary of Nexus Water Group, Inc. Nexus Water Group, Inc. is a 100% owner of SouthWest Water Company, LLC. SouthWest Water Company, LLC is a 100% owner of Southeast Utility Systems, Inc. Southeast Utility Systems, Inc. is a 100% owner of FWH. FWH will be 100% owner of FCRU. Additionally, please see the organizational chart attached as 'Attachment One.'

RESULTING OWNERSHIP INTERESTS IN FIRST COAST REGIONAL UTILITIES UPON CLOSING

Upon closing, in accordance with the terms of the Agreement, RUH will convey 606.670000 shares – 100 percent of the issued and outstanding stock of FCRU – to FWH. Following the closing date, the ultimate controlling entity of FCRU will be Nexus Water Group, which will control FCRU indirectly through Southeast Utility System, and FWH. FWH will be the sole direct shareholder of FCRU. This is the single change in control for which Commission approval is sought in this docket.

Thank you for your assistance in connection with this matter.

Sincerely,

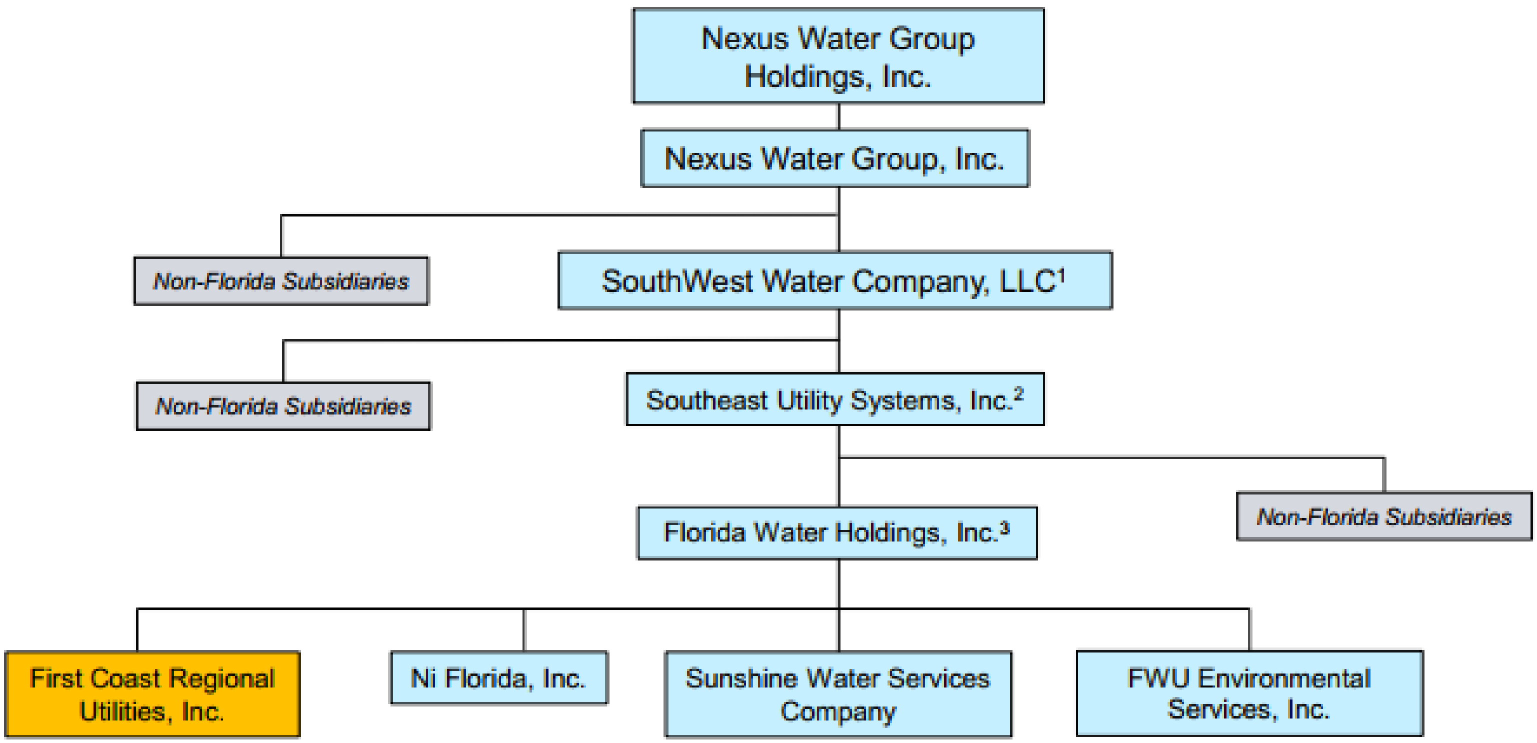
Virginia L. Ponder

VLP/dk
Attachment

[3] The Agreement is attached as Exhibit C to the Application for Transfer of Majority Control (DN 03715-2026).

Attachment One

Nexus Water Group – Florida



1 = SWWC is 100% owner of SEUS
2 = SEUS is 100% owner of FWH
3 = FWH will be 100% owner of FCRU. Formerly Florida Utility Systems, FWH formed 5/12/2020.

NEXUS WATER GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Response, filed on behalf of Florida Water Holdings, Inc. has been furnished by electronic mail on the 29th day of July 2026 to the following:

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