



February 13, 2018

E-Filing

Carlotta S. Stauffer, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Docket No. 20170166-WS- Application for limited proceeding rate increase in Orange County  
by Pluris Wedgefield, Inc.  
Our File No. 43085.20

Dear Ms. Stauffer:

The following are Pluris Wedgefield, Inc.'s ("Utility") responses to Staff's Third Data Request dated February 12, 2018:

### **Rate Case Expense**

- 1) Please explain who Maurice Gallarda is and why he needs to attend the Agenda Conference for this Limited Proceeding.

**Response:** *Maurice Gallarda, PE is the President and Principal Engineer for Pluris Wedgefield, Inc. He is the Managing Member of Pluris Holdings, LLC the parent company to Pluris Wedgefield, Inc. In his capacity as Managing Member, he oversees all management and operating decisions for each of the operating companies. In this capacity his time is allocated to all of the utilities. His allocated hourly rate including burden is \$172.43. He is a licensed civil engineer, with 30 years design experience in wastewater, water and geotechnical engineering. In the instance of this limited rate case, Mr. Gallarda has been directly involved in engineering, operating and financial decisions for the AMI meters (including procurement and review of geotechnical foundation design of the AMI tower), the commercial water softeners and wastewater pipeline replacement projects. For purposes of the Agenda Conference Mr. Gallarda will be available to answer questions from the Commissioners that may arise. His attending the conference reduces the burden to rate payers as there would be no additional billing of his hours for the conference. Steve Romano, senior professional engineer with Kimley-Horn Associates, Inc., (the 3<sup>rd</sup> party professional engineers) who was retained for the above projects is not expected to have to attend the conference, since Mr. Gallarda will be doing so. If he were to attend he would be billed at the rate of \$209.24 per hour. Considering a day and a half for his preparation, travel and attending the conference, rate payers would be charged \$2,510.88 plus additional costs for lodging and meals. In addition, Office of Public Counsel has encouraged customer to file complaints (and there are many in the Docket) and it is important that the Commissioners hear directly from Mr. Gallarda the utility's dedication to providing excellent customer service in compliance with all regulatory requirements.*

## AMI Meters

Please refer to Pluris Wedgefield's response to staff's second data request, document no. 00907-2018.

- 2) Pluris' response to request 5 b. indicates estimated bills were due to dead meters caused by faulty batteries. When does Pluris anticipate the problem with the faulty batteries will be resolved?

**Response:** *The meter manufacturer states that the battery issue can be resolved through a software update through the AMI meter analytic software framework. This update is anticipated to be completed within 30 days.*

- 3) Pluris' response to request 16 indicates that invoice numbers 53 and 58 were two separate engineering studies.

- a. Please describe how Pluris determined the sequence of studies performed for the AMI tower.

**Response:** *The 3<sup>rd</sup> party propagation study is conducted to confirm reliable signal from all meters within a service area. Two sites were identified as possible candidates. The initial AMI tower site was considered due to the central location inside the Wedgefield community and was originally thought to be a viable location by all 3<sup>rd</sup> party technical representatives. Through the propagation study for this site it was determined the site could not produce reliable signaling. As a result a second site location was identified and the propagation study confirmed the site was suitable for reliable signaling in all meters.*

- b. Would there have been any cost savings if HD Supply surveyed multiple sites in one engineering study instead of just one site and another company performing another site survey study?

**Response:** *No.*

- c. Would it have been feasible to perform the Sensus propagation study first before the site survey to help determine where the site for the AMI tower should be? Please explain your response.

**Response:** *No. The propagation study requires a minimum time period of 60 days to confirm signal reliability. Sensus was comfortable that one of the two sites would ultimately confirm signal reliability, but could not guarantee either would without a propagation study. As it would turn out the first site, believed to be the best guess did not prove out.*

- 4) Please provide any invoices related to the AMI Software Maintenance expense.

**Response:** *See attached invoices for the recurring annual portal hosting service and the annual analytics warranty.*

## Meter Retirements

- 5) Please refer to Schedule No. 7, document no. 06333-2017, and Staff's Second Data Request question number 7, document no. 00907-2018. Schedule No. 7 shows a reduction to Account 334.4 Meters/Meter Installations and Account 108.334 A/D – Meters/Meter Installations of \$224,489. Given the fact that most of the meters that were retired were not fully depreciated, how is the

Company treating the difference between the \$224,489 reduction to Accumulated Depreciation and the actual amount of Accumulated Depreciation related to the retired meters?

**Response:** *Pluris' fixed asset depreciation schedule had a 2016 beginning balance for meters in account 334.4 of \$224,489. The associated accumulated depreciation account in 108.334 had a 2016 beginning balance of \$217,093, leaving a net asset balance of \$7,396 which was set to fully depreciate in 2016. Since that amount was expensed as depreciation in 2016, then there was no additional difference to be dealt with. Pluris utilizes the pooling method when depreciating fixed assets and does not have the capability to track or depreciate each individual asset.*

- 6) Please provide the balance of Account 108.334 A/D – Meters/Meter Installations prior to the meter retirements.

**Response:** *Account 108.334 had a 2016 beginning balance of \$217,093 plus 2016 scheduled depreciation of \$7,396 which totals \$224,489 prior to the meter retirements.*

- 7) Please provide the original cost for each of the meters that were retired.

**Response:** *Pluris does not have this information since many of the meters were installed prior to Pluris' ownership. Also, as indicated in #5 above, Pluris does not have the capability to track the cost of each individual meter.*

### **Cell Tower Rental Expense**

- 8) Please provide any invoices related to the Cell Tower Rental Expense.

**Response:** *There is no Cell Tower Rental Expense. There is no cell tower within the Wedgefield community that could have been evaluated. The Wedgefield community is known for cellular issues. When the limited proceeding was filed, it was contemplated that we may need to rent a tower. Given the aforementioned cellular issues, it finally was decided to not rent space on a tower. Pluris acknowledges that the cost of \$750/month included on the application should be removed.*

- 9) If there is a cell tower rental expense, why did Pluris pay for installation of the AMI tower per Invoices 54 and 55?

**Response:** *There is no Cell Tower Rental Expense. See response to #8 above.*

Should you have any questions, please do not hesitate to give me a call.

Very truly yours,

*/s/ Martin S. Friedman*

MARTIN S. FRIEDMAN  
For the Firm

MSF/

cc: Dan Winters (via e-mail)  
Maurice Gallarda (via e-mail)  
Danijela Janjic, Esquire (via e-mail)  
Virginia Ponder, Esquire (via email)



# INVOICE

1830 Craig Park Court  
St. Louis, MO 63146

Invoice #	H981464
Invoice Date	10/19/17
Account #	225342
Sales Rep	PAUL THOMAS
Phone #	941-364-8909
Branch # 579	Sarasota, FL
Total Amount Due	\$4,124.29

Remit To:  
CORE & MAIN LP  
PO BOX 4853  
ORLANDO, FL 32802-4853

747 1 MB 0.423 ED147X I0221 D2946418107 S2 P4748687 0001:0001



PLURIS WEDGEFIELD, INC.  
1102 S FLORIDA AVE  
LAKELAND FL 33803-1308

Shipped to:  
3100 BANCROFT BLVD  
ORLANDO, FL

CUSTOMER JOB- METERS METERS

Thank you for the opportunity to serve you! We appreciate your prompt payment.

Date Ordered	Date Shipped	Customer PO #	Job Name	Job #	Bill of Lading	Shipped Via	Invoice #
10/18/17	9/12/17	JK/WF/AMI	METERS	METERS		DIRECT	H981464

Product Code	Description	Quantity		B/O	Price	UM	Extended Price
		Ordered	Shipped				
/45015082613	CORE & MAIN PO#- 7378474 PART#: 5396383700535B SENSUS WTR ANALYTICS ENHANCED 5-10K ANNUAL FEE YEAR 2	1	1		3872.58000	EA	3,872.58

<p><b>Effective 8/29/2017</b> Visit: <a href="http://coremain.com">coremain.com</a> for forms (see right)</p>	<p><b>HD SUPPLY WATERWORKS IS NOW:</b></p> 	<p><b>Available on the new website</b></p> <ul style="list-style-type: none"> <li>• New W-9</li> <li>• Formal name change letter</li> <li>• FAQ for customers &amp; vendors</li> </ul>
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Freight	Delivery	Handling	Restock	Misc.
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Subtotal:	3,872.58
Other:	0.00
Tax:	251.71
<b>Invoice Total:</b>	<b>\$4,124.29</b>

Terms: NET 30

Ordered By:

This transaction is governed by and subject to CORE & MAIN's standard terms and conditions, which are incorporated by reference and accepted. To review these terms and conditions, please visit: [www.waterworks.hdsupply.com/TandC](http://www.waterworks.hdsupply.com/TandC).

# SUPPLY WATERWORKS

DUPLICATE INVOICE

1830 Craig Park Court  
St. Louis, MO 63146

Invoice # G802843  
Invoice Date 2/24/17  
Account # 225342  
Sales Rep PAUL THOMAS  
Phone # 941-364-8909  
Branch #579 Sarasota, FL  
Total Amount Due \$22,260.00

Remit To:  
HD SUPPLY WATERWORKS, LTD.  
PO BOX 4853  
ORLANDO, FL 32802-4853

PLURIS WEDGEFIELD, INC.  
1102 S FLORIDA AVE  
LAKELAND FL 33803 1308

Shipped To:  
3100 BANCROFT BLVD  
ORLANDO, FL

CUSTOMER JOB- METERS METERS

Thank you for the opportunity to serve you! We appreciate your prompt payment.

Date Ordered	Date Shipped	Customer PO #	Job Name	Job #	Bill of Lading	Shipped Via	Invoice#
2/16/17	2/16/17	JK/WF/AMI	METERS	METERS		CARRIERHDSUPPLY	G802843

Product Code	Description	Quantity		E/O	Price	UM	Extended Price
		Ordered	Shipped				

HD SUPPLY WATERWORKS PO#-8016672

/45014784797	CUSTOMER PORTAL SETUP/HOSTING	1	1		15000.00000	EA	15,000.00
/45014784799	RECURRING ANNUAL PORTAL HOST	1	1		6000.00000	EA	6,000.00

*Apply Credit Memo H073338*

*22,260.00*  
*< 2,052.39 >*

*20,207.61*



Freight Delivery Handling Restock Misc

Subtotal: 21,000.00  
Other: .00  
Tax: 1,260.00

Terms: NET 30

Invoice Total: ~~22,260.00~~

This transaction is governed by and subject to HD Supply Waterworks' standard terms and conditions, which are incorporated by reference and accepted. To review these terms and conditions, please visit: <http://waterworks.hdsupply.com/TandC>

# SUPPLY WATERWORKS CREDIT MEMO

DUPLICATE

1830 Craig Park Court  
St. Louis, MO 63146

Invoice # H073338  
 Invoice Date 4/21/17  
 Account # 225342  
 Sales Rep PAUL THOMAS  
 Phone # 941-364-8909  
 Branch #579 Sarasota, FL  
 Total Amount Due -\$2,052.39

Remit To:  
 HD SUPPLY WATERWORKS, LTD.  
 PO BOX 4853  
 ORLANDO, FL 32802-4853

PLURIS WEDGEFIELD, INC.  
 1102 S FLORIDA AVE  
 LAKELAND FL 33803 1308

Shipped To:  
 3100 BANCROFT BLVD  
 ORLANDO, FL

CUSTOMER JOB- METERS METERS

Thank you for the opportunity to serve you! We appreciate your prompt payment.

Date Ordered	Date Shipped	Customer PO #	Job Name	Job #	Bill of Lading	Shipped Via	Invoice#
4/19/17	4/20/17	JK/WF/AMI	METERS	METERS		CARRIERHDSUPPLY	H073338

Product Code	Description	Quantity		E/O	Price	UM	Extended Price
		Ordered	Shipped				

Reference Invoice No.G802843

/45014784797	CUSTOMER PORTAL SETUP/HOSTING	1	1		15000.00000	EA	-15,000.00
/45014784797	CUSTOMER PORTAL SETUP/HOSTING	1	1		13063.78000	EA	13,063.78

Freight Delivery Handling Restock Misc

Terms: NET 30

Subtotal: -1,936.22  
 Other: .00  
 Tax: -116.17  
 Invoice Total: -\$2,052.39

This transaction is governed by and subject to HD Supply Waterworks' standard terms and conditions, which are incorporated by reference and accepted. To review these terms and conditions, please visit: <http://waterworks.hdsupply.com/TandC>