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> May19, 2021 Via E-Mail: <u>Commissioner.Clark@psc.state.fl.us</u>

Chairman Gary F. Clark Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Pluris Wedgefield, LLC 2020 Test Year General Rate Increase Application <u>Our Matter No. 075541</u>

Dear Chairman Clark:

This letter, pursuant to Rule 25-30.430, Florida Administrative Code, requests approval of a test year for Pluris Wedgefield, LLC (the "Company"). The Company intends to submit an application for general rate relief to the Florida Public Service Commission for its water and wastewater systems located in Orange County, Florida. The Company intends to submit the minimum filing requirements ("MFRs") on or before September 1, 2021.

The Company's last file and suspend rate proceeding was in Docket No. 20120152-WS utilizing a historic December 31, 2011, test year. That proceeding culminated in Order No. PSC-2013-0187-FOF-WS, issued May 2, 2013, as amended by Order No. PSC-2017-0187A-FOF-WS issued May 30, 2013 to correct a scrivener's error. The Company subsequently filed a Limited Proceeding in Docket No. 20170166-WS which culminated in Order No. PSC-2018-0311-PAA-WS, issued on June 13, 2018.

The Company requests an historic test year ending December 31, 2020. The requested test year is representative of a normal full year of operation. However, there will be pro forma adjustments to expenses to reflect expenses that will be incurred in the year when rates will be in effect. However, the Company is the defendant in a frivolous lawsuit and will request that the expenses of such lawsuit be a pro forma expense if the lawsuit is concluded during the pendency of this case, or as a regulatory asset to be deferred and amortized if it is not.

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Since the Company's last rate proceedings, the Company has experienced increases in O&M expense such as salaries and wages, insurance, purchased power, and chemicals that were not completely offset by reductions in other annual operating expenses or annual indexing rate increases. Several increases in capital costs include replacement of the wastewater treatment plant ("WWTP") office, replacement of paved driveway and parking lot at the WWTP, rebuild of the re-use irrigation system at the WWTP, a truck winch/crane for pulling lift stations in the WWTP collection system, a new emergency generator at the WWTP, a security gate and cameras at the WWTP and new programming software for the water softening at the drinking water treatment plant.

The Company does not presently anticipate any pro forma plant additions.

Pursuant to Section 367.081 (8), Florida Statutes, the Company requests that the Commission process this Application for rate relief using the proposed agency action procedure. The Company also will request interim rates based on the historic test year.

Should you or members of the Staff have any questions regarding this request, please do not hesitate to contact me.

Very truly yours,

Juntan Conca

Martin S. Friedman For the Firm

cc: Maurice Gallarda (via e-mail) Dan Winters (via e-mail) Adam Teitzman (via E-Filing) Andrew Maurey (via e-mail) Forrest Boone (via e-mail)