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Public Service Commission

October 19, 2023

Martin S. Friedman, Esquire
Dean Mead Law Firm
420 S. Orange Ave., Suite 700
Orlando, FL 32801
mfriedman@deanmead.com

Re: Docket No. 20230083-WS – Application for Increase in Water and Wastewater Rates in Orange County by Pluris Wedgefield, LLC.

Dear Mr. Friedman:

Staff has reviewed the minimum filling requirements (MFRs) submitted on September 22, 2023 on behalf of Pluris Wedgefield, LLC (Pluris or Utility). After review, we find the MFRs to be deficient. The specific deficiencies are identified as:

Deficiencies

1. Pursuant to Rule 25-30.433(3), Florida Administrative Code (F.A.C.), working capital for Class A utilities shall be calculated using the balance sheet approach. Working capital for Class B and C utilities shall be calculated using the formula method (one-eighth of operation and maintenance expenses). The Utility's MFR Schedule A-17 uses the formula method to calculate working capital for both the water and wastewater systems. Please correct MFR schedule A-17 using the balance sheet approach and correct any fallout calculations necessary due to this correction.
2. Rule 25-30.437(1), F.A.C., requires a utility to complete MFRs. The following values were not pursuant to the instructions in the MFRs. For the following items listed below, please correct the filings to address the errors as well as correct any fallout figures:
 - a. For water, the residential and irrigation gallons shown on Schedule E-2 do not match the number of residential and irrigation gallons shown on Schedule E-14. Please address the fall out of all changes made.
 - i. Schedule E-2, pg. 1 of 2, lines 3-5, column 3
 - ii. Schedule E-2, pg. 1 of 2, lines 3-5, column 5
 - iii. Schedule E-2, pg. 1 of 2, lines 8-15, column 3
 - iv. Schedule E-2, pg. 1 of 2, lines 8-15, column 5

- v. Schedule E-2, pg. 1 of 2, lines 21-27, column 3
 - vi. Schedule E-2, pg. 1 of 2, lines 21-27, column 5
- b. For wastewater, the residential and general service gallons shown on Schedule E-2 do not match the number of residential and general service gallons shown on Schedule E-14. Please address the fall out for any changes made.
- i. Schedule E-2, pg. 2 of 2, lines 3, column 3
 - ii. Schedule E-2, pg. 2 of 2, lines 3, column 5
 - iii. Schedule E-2, pg. 2 of 2, lines 8-16, column 3
 - iv. Schedule E-2, pg. 2 of 2, lines 8-16, column 5
- c. For each Schedule E-14, the column 8 percentages of total water do not reflect the correct percentages at each consumption level according to the column 7 consolidated factor.
- d. Please refer to the gallons pumped on MFR Schedule F-1. The values should match the monthly operating reports sent to the Florida Department of Environmental Protection (DEP). Provide the correct values for all months.
- e. Please refer to the Other Uses values included in MFR Schedule F-1. Provide calculations to support the Other Uses values.
- f. Please refer to the gallons treated in MFR Schedule F-2. The values should match the discharge monitoring reports sent to the DEP. Provide the correct values for April 2022 and October 2022.
- g. Please refer to the Maximum Day value in MFR Schedule F-3 and referenced in Schedule F-5. The value should match the monthly operating reports sent to the DEP. Provide the corrected value, or if there was an unusual event, explain and provide the next highest maximum day without an unusual event.
- h. Please refer to the Required Fire Flow in MFR Schedule F-3 and referenced in MFR Schedule F-5. Provide the supporting documentation.
- i. Please refer to the Average Daily Flow in MFR Schedule F-3. This value should be calculated from the utility's monthly operating reports to DEP. Provide the corrected value.
- j. Please refer to the average annual daily flow in MFR Schedule F-4 and referenced in MFR Schedule F-6. This value should match the utility's discharge monitoring reports to DEP. Provide the corrected value.
- k. Please refer to the excess unaccounted for water in MFR Schedule F-5, page 1, line 8. This value should reflect the amount determined in MFR Schedule F-1, which did not include any excess unaccounted for water. Provide a corrected value.

- l. Please refer to the pumping capability values for Wells #2 and #3 in MFR Schedule F-5, page 2, line 3 used to determine the Firm Reliable Capacity on MFR Schedule F-5, page 1, line 3. These values should match the capacities listed in the utility's most recent DEP sanitary survey. Provide corrected values.
 - m. Please refer to the calculation of demand for water distribution and wastewater collection system used & useful percentages in MFR Schedule F-7. These values should be by total ERCs and reflect the difference in water and wastewater ERCs contained in MFR Schedules F-9 and F-10. Provide corrected values.
 - n. Please refer to the equivalent growth in units of ERCs in MFR Schedule F-8. Provide the supporting calculation used to determine the value in units of ERCs.
 - o. Please refer to the flow per ERC value used in MFR Schedule F-8 and referenced in MFR Schedules F-5, F-6, and F-7. Provide the calculation used to determine the flow provided.
 - p. Please refer to the annual growth in ERC calculations for water customers in MFR Schedule F-9. The company should also provide a linear regression analysis pursuant to Rule 25-30.0431(2)(c), F.A.C. Provide the required analysis.
 - q. Please refer to the annual growth in ERC calculations for wastewater customers in MFR Schedule F-10. The company should also provide a linear regression analysis pursuant to Rule 25-30.0431(2)(c), F.A.C. Provide the required analysis.
3. Rule 25-30.437(3), F.A.C., requires a utility to file additional engineering information. For the following subsections of the Rule, please correct the filings to address the errors below:
 - a. Subsection (b) requires that for each chemical, the utility provide the quantity of purchases and the unit prices of each purchase. Please provide the necessary values.
 - b. Subsection (d) requires that the utility provide the DEP monthly operating reports for the test year and preceding year. Please provide the monthly operating report for September 2021.
 - c. Subsection (j) requires that the utility provide an explanation for how complaints were resolved. Please provide a version with full narrative in an electronic readable format. (Excel or PDF)
 - d. Subsection (k) requires that the utility provide all customer complaints regarding DEP secondary standards during the past five years. Please provide a version that contains the entire narrative in an electronic readable format. (Excel or PDF)

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4. Rule 25-30.4415, F.A.C. requires a utility provide additional information regarding plant investments made in the public interest. Please provide this information for each of the utility's capital projects, including pro-forma project(s).

If any above corrections require a corresponding change to any other MFR schedules, those corrected schedules must also be submitted in accordance with Rule 25-30.436(4)(e), F.A.C. Your petition will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than November 20, 2023.

Sincerely,

Andrew L. Maurey

Andrew L. Maurey
Director

ALM:wt

cc: Division of Accounting and Finance (Cicchetti, Norris, Sowards)
Division of Auditing & Performance Analysis (Hicks, D. Brown)
Division of Economics (Draper)
Division of Engineering (King, Ellis)
Office of the General Counsel (Crawford, Watrous)
Office of Commission Clerk (Docket No. 20230083-WS)
Office of the Public Counsel