



**KATHLEEN
PASSIDOMO**
*President of the
Senate*

**STATE OF FLORIDA
OFFICE OF PUBLIC COUNSEL**

**c/o THE FLORIDA LEGISLATURE
111 WEST MADISON ST.
ROOM 812
TALLAHASSEE, FLORIDA 32399-1400
850-488-9330**

**EMAIL:
OPC_WEBSITE@LEG.STATE.FL.US
WWW.FLORIDAOPC.GOV**



PAUL RENNER
*Speaker of the
House of
Representatives*

October 23, 2023

VIA: ELECTRONIC FILING

Adam Teitzman
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

On September 22, 2023, Pluris Wedgefield, LLC (Pluris or Utility) filed the minimum filling requirements (MFRs) for the above-referenced docket. By letter dated October 19, 2023, Commission staff found several deficiencies to the MFRs. By letter dated October 20, 2023, OPC submitted additional MFR deficiencies for consideration. Upon further review, OPC respectfully submits additional MFR deficiencies, discussed below, for consideration.

On MFR Schedule C-1 - entitled "Reconciliation of Total Income Tax Provision," Pluris stated the following: "The Utility is not currently a C-Corp so this schedule is not applicable." On MFR Schedule B-1 and B-2, Pluris reflected a Provision for Income Taxes of \$158,586 and \$23,869 for water and wastewater, respectively. Further, on these MFR schedules, the Utility erroneously reflected that the supporting schedule was B-3.

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Pursuant to Rule 25-30.437(1), Florida Administrative Code, Class B utilities are required to provide Form PSC 1029 (12/20), entitled “Class B Water and/or Wastewater Utilities Financial, Rate and Engineering Minimum Filing Requirements”. Under Form PSC 1029 (12/20), MFR Schedule C-1 is the supporting schedule for the “Provision for Income Taxes” amounts reflected on MFR Schedules B-1 and B-2. Therefore, consistent with Pluris’ MFR Schedule C-1, there should be \$0 for the “Provision for Income Taxes” on MFR Schedules B-1 and B-2.

Respectfully submitted,

Bart Fletcher

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Legislative Analyst