

Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A.  
420 South Orange Avenue, Suite 700  
P.O. Box 2346 (ZIP 32802-2346)  
Orlando, FL 32801

(407) 841-1200  
(407) 423-1831 Fax  
www.deanmead.com

**Attorneys and Counselors at Law**  
Orlando  
Fort Pierce  
Tallahassee  
Viera/Melbourne  
Vero Beach  
Stuart (By Appointment)

**MARTIN FRIEDMAN**  
407-310-2077  
mfriedman@deanmead.com

February 16, 2024  
via efilng

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

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

Dear Mr. Teitzman:

On behalf of Pluris Wedgefield, LLC (“Pluris” or “Utility”) this letter is the response to Staff’s Fourth Data Request dated January 18, 2024.

1. Please refer to the MFR schedule A-19, page 2 of 2, Line 14. In December 2022, Accounts Payable – Associated Companies was reduced by \$4,429,893 and moved to Other Equity Capital. Why was this originally booked as Accounts Payable – Associated Companies and not as Other Equity Capital?
2. *Response: The original booking of these amounts to Accounts Payable – Associated Companies was an oversight and Pluris recognizes that this should have been recorded as Advances from Associated Companies since there was no expectation of repayment. Had this been recorded this way from the beginning, then the reclassification to correct that oversight in December 2022 to Other Equity Capital would not have been necessary.*
3. Please refer to the MFR schedule A-19, page 2 of 2, Line 19. In December 2022, Misc. Current and Accrued Liabilities was reduced by \$3,300,000 and moved to Other Equity Capital. Why was this originally booked as Misc. Current and Accrued Liabilities and not as Other Equity Capital?

*Response: The Accrued Liability account was reduced when the liability was paid in Cash. The Parent funded the cash necessary to pay the liability, so the Cash contribution to Pluris Wedgefield was recorded as Equity.*

4. Please refer to MFR schedule A-19, page 2 of 2, line 9.

- a. Is the \$250,000 included in Advances from Associated Companies the same balance that was to be treated as equity, per a Commission-ordered adjustment from the last rate case?

*Response: Yes, the balance has not changed.*

- b. If so, why was it not treated as equity in this docket?

*Response: This was an oversight and should have been treated as Equity consistent with the last rate case.*

5. Please provide a detailed job description and list of responsibilities for each of the Utility's in-house employees.

*Response: These were provided in response to Staff's First Data Request, Item 2 b. Another copy with the salaries redacted is attached.*

6. Please provide a detailed list of responsibilities Pluris Management Group, LLC handles. For the purposes of this response, please explain in detail how these activities are not duplicative of the work of the in-house employees.

*Response: Pluris Management Group provides managerial experience and functionality not provided by the staff of Pluris Wedgefield. Those activities consist of the following: Management (Business Leadership and Planning), Accounting and Finance (assisting with Accounts Payable, HR/Payroll, Tax, etc.), Billing and Collections (improve customer service), and Information Technology (management of computer systems, phones, network, etc.). Pluris Management Group also handles non routine matters such as the substantial time in addressing matters in this rate case, including responding to multiple audit data requests (58 formal plus 2 informal), multiple staff data requests (10 so far) and OPC discovery (3 sets of interrogatories and production of documents so far). Pluris Management Group is committed to providing operational direction, engineering design oversight, and other administrative assistance, as needed, as a means for reducing costs of outside third party consultants, including engineering design firms, regulatory and permitting consultants, construction consultants and contract administration consultants.*

7. Please refer to the response to staff's second data request No. 1a. Pluris Wedgefield has a full in-house staff to handle day-to-day operations. How does the role the management company performs for Pluris Wedgefield differ from the role it performs for with Pluris Alabama?

*Response: With the exception of asset replacement such as new well pumps and motors, Pluris provides no oversight to Pluris Alabama, due to the County government providing all operating and management services to its customers. Pluris has no contact with the County customers, unlike that at Pluris Wedgefield, where operating staff will routinely request management to respond to Pluris Wedgefield customers and inquiries from outside parties including the Orange County, DEP and Media.*

8. Please provide a detailed list of responsibilities Pluris Management Company, LLC provides for Pluris Wedgefield that it does not provide for Pluris Alabama.

*Response: Pluris Alabama's infrastructure is entirely technically operated by the County government. The County is effectively paying a royalty for water pumped. Pluris Wedgefield is operated by Pluris. In an effort to reduce the outside service costs related to the water treatment process, including the chlorine dioxide treatment plant, the water softening treatment plant, the MIEX resin treatment plant, Pluris Management Group has in-house professional engineering that provides engineering design oversight. This is not required for Pluris Alabama as the County has its own engineering group. Of the remaining responsibilities covered by Pluris Management Group as listed in response to Item 5 above, the only items provided for Pluris Alabama are Accounts Payable processing (few monthly invoices), Accounts Receivable (one bill processed per month), and IT network maintenance (as needed).*

9. Please provide the most recent actual and estimated Rate Case Expense. In addition, provide detailed explanations and calculations to justify estimated expense to complete this rate case.

*Response: Attached is the updated actual and estimated Rate Case Expense. Since the rate case expense time expended by Mr. Gallarda, Mr. Winters, Ms. Yopp and other Pluris Management Group employees are included in the management fee as referenced in response 5 above, assuming no adjustment to the management fee, there is no rate case expense for them.*

Should you or Staff have any questions regarding this response please do not hesitate to contact me.

Very truly yours,

/s/ Martin S. Friedman

Martin Friedman

MSF:

Cc: Justin Swards (via email)

**Pluris Wedgefield Employees**

Employee	Title	Description of Work	Certificates / License	2022 Comp	
Joe Kuhns	Regional Manager	Responsible for budget and implementation. Guide, train and manage lower-level management and supervisors. Prepare performance reports, staffing, profit, performance and other operations. Uphold company standards of excellence and service, guaranteeing quality performance. Overseeing daily compliance operations, managing budgets, and setting performance objectives. Recruiting, training, and supporting project managers and staff. Planning, evaluating, and optimizing operations to be efficient and cost-effective. Dealing with escalated customer issues, incident reports, and legal actions.	WW - B-7207 W - C-6754	\$ [REDACTED]	
Garth Armstrong	Senior Project Manager	Develop project plans that identify resource and budgetary needs. Conduct project meetings at least once a week with staff. Provide feedback, advice, project updates and encouragement to staff. Manage deadlines and push staff to ensure timeliness. Coordinate with vendors and suppliers as needed. Provide on-site leadership for staff by building and motivating staff members to meet project goals, adhering to their responsibilities and project milestones.	WW - B-9532 W - C-12703	\$ [REDACTED]	
Bill Trendel	Project Manager	Determine and define project scope and objectives. Develop and manage a detailed project schedule and work plan. Provide on-site leadership for staff by building and motivating staff members to meet project goals, adhering to their responsibilities and project milestones. Ensures compliance operations. Works closely with Customer Service office and coordinates customer interactions. Oversee work orders.	WW - A-9184 W - C-6411	\$ [REDACTED]	
Roger Holsapple	W & WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-8863 W - C-7436	\$ [REDACTED]	
Josue Rolon	WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-26749	\$ [REDACTED]	Started Sep 2022
Kenny Mendez	W & WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-15817 W - B-18413	\$ [REDACTED]	Terminated Apr 2023
Mike Jones	W & WW Trainee	Works with Project Manager to learn compliance operations. Conducts customer interactions. Conducts work orders.	Trainee	\$ [REDACTED]	Resigned Jun 2023
Greg Peck	W & WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-13426 W - C-15164	Terminated 11-10-2021	
James Carroll	W & WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-15920 W - C-8494	Resigned 8-10-2021	
Dylan Brown	W & WW Trainee	Works with Project Manager to learn compliance operations. Conducts customer interactions. Conducts work orders.	Trainee	Resigned 8-25-2021	

We allocate costs 50/50 between water and wastewater expense accounts. For any capitalized labor, we allocate those costs to the appropriate capital accounts based on the hours spent on the project and use an average employee rate including payroll taxes and benefits.

**ATTACHMENT DR4 - #8**

**Pluris Wedgefield, LLC**  
**Docket No. 20230083-WS**

**Actual and Estimated Rate Case Expense**

- Actual Billed Attorney Fees through January 15, 2024 (Invoices Attached): \$31,347.00
- Actual Unbilled Attorney Fees through January 31, 2024 (Detail Attached): \$5,863.00
- Actual Billed Costs through January 15, 2024 (Invoices Attached): \$1,026.66
- Actual Unbilled Costs through January 31, 2024 (Detail Attached): \$102.82
- Filing Fee: \$4,000.00

Estimated:

<u>Hours</u>	<u>Description</u>
15.0	Respond to formal and informal data requests from Staff and discovery from OPC
10.5	Travel to and from Tallahassee for Agenda Conference; Prepare for and attend Agenda Conference on OPC's Motion for Rehearing; discuss outcome with client.
1.5	Review Staff recommendation; Conference with client regarding recommendation; Review Order on rehearing and conference with client
6.0	Research and draft Answer Brief in OPC Appeal
1.5	Review Staff recommendation; Conference with client regarding recommendation; Conference with Staff regarding recommendation.
10.5	Travel to and from Tallahassee; Prepare for and attend Agenda conference, discuss Agenda with client and Staff.
1.5	Review PAA Order; conference with client and consultants regarding PAA Order.
2.0	Prepare revised tariff sheets, obtain Staff approval of tariffs; Draft and revise customer notice, obtain Staff approval; Coordinate mailing of customer notices and implementation of tariffs and filing Affidavit; Prepare, review and filing of post-Order requirements
48.5 @ \$410/hr.	\$19,885.00 total attorneys' estimated fees through PAA

Estimate of costs to complete:

\$ 1,500.00 Estimated travel expense to two PSC Agendas  
 \$ 200.00 Estimated miscellaneous costs  
**\$ 1,700.00 Total Estimated Costs**

**SUMMARY:**

TOTAL ACTUAL AND ESTIMATED LEGAL FEES: \$57,095.00

TOTAL ACTUAL AND ESTIMATED LEGAL COSTS: \$2,829.48

TOTAL ACTUAL FILING FEE: \$4,000.00

TOTAL COST OF MAILING CUSTOMER NOTICES (4): \$7,600

COMPANY COST TO ATTEND AGENDA: \$1,150.00 (\$600 air; \$250 rental car; \$100.00 meals; \$200 hotel)

**TOTAL RATE CASE EXPENSE: \$72,674**



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Pluris Wedgefield, LLC  
5950 Berkshire Ln, Ste. 800  
Dallas, TX 75225

January 17, 2024  
Invoice No. 439920  
Billing Attorney: MSF

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## INVOICE SUMMARY

For Professional Services Rendered through January 15, 2024

**Client.Matter No.: 037195.1000235**

**RE: 2022 Test Year Rate Case**

Total Fees	\$ 5,371.00
Total Expenses	<u>\$ 28.15</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 5,399.15</b>

# DEAN|MEAD

Client No.: 037195  
Matter No.: 1000235

January 17, 2024  
Invoice No. 439920

## PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Rate	Amount
12/18/23	MSF	Finalize Request for Confidential Classification and redact and highlight documents; e-file and mail; review staff's 3rd date request and correspondence to client; Begin research PSC Orders and draft of responses; Review and comment on responses and documents in connection with OPC discovery; Review and comment audit request;	.90	410.00	369.00
12/19/23	MSF	Review OPC second Set of Interrogatories and Second Request for Production of Documents, begin draft of responses and correspondence with Mr. Gallarda and Mr. Winters; correspondence with Ms. Yopp regarding noticing;	.50	410.00	205.00
12/20/23	MSF	Review affidavit of mailing combined notice and supporting documents; correspondence with Ms. Yopp; Research and draft Notice of Filing; Review and comment proposed audit request response;	.30	410.00	123.00
12/29/23	MSF	Finalize responses to OPC's 1st set of Interrogatories; Research, draft and efile Motion for Temporary Protective Order and draft and efile Notice of Service of Discovery Responses;	.50	410.00	205.00
1/02/24	MSF	Continue Research and draft of responses to staff's 3rd data request and correspondence with client; Review and comment on proposed audit responses;	.40	410.00	164.00
1/03/24	MSF	Review, research and respond to correspondence from Ms. Yopp regarding interim rates; Review and comment proposed audit request response; continue working with Mr. Gallarda and Mr. Winters on responses to Staff's Second Data Request;	.60	410.00	246.00
1/05/24	MSF	Telephone conference with Mr. Swards of PSC who telephoned regarding customer meeting notice; review and respond to email from OPC; Correspondence with Ms. Yopp regarding data request responses;	.40	410.00	164.00
1/08/24	MSF	Review Affidavit of Mailing and documents from Ms. Yopp and email to Ms. Yopp; Draft, efile and serve Notice of Filing the Affidavit of Mailing the Customer Meeting Notice; Correspondence regarding outstanding discovery from Office of Public Counsel and data requests from Staff; initial review and comment on Office of Public Counsel 's Motion for Reconsideration; follow-up Correspondence with Mr. Gallarda;	.70	410.00	287.00
1/09/24	MSF	Begin Research and draft of response to OPC Motion for Reconsideration; Telephone conference with Mr. Gallarda who telephoned;	1.30	410.00	533.00
1/11/24	MSF	Continue Research and draft of response to OPC Motion for Reconsideration; and Request for Oral Argument;	1.40	410.00	574.00



# DEAN|MEAD

Client No.: 037195  
Matter No.: 1000235

January 17, 2024  
Invoice No. 439920

<b>Date</b>	<b>Atty</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
1/12/24	MSF	Continue Research and draft of Response to OPC's Motion for Rehearing; initial review of documents responsive to OPC's second Request for Production of Documents and emails;	1.30	410.00	533.00
1/14/24	MSF	Continue Research and draft of response to OPC Motion for Reconsideration;	2.10	410.00	861.00
1/15/24	MSF	Finalize Response to Request for Oral Argument, continue Research and draft of Response to Motion for Rehearing; review documents from Mr. Winters and conference call Mr. Mr. Winters and Mr. Gallarda regarding responses to OPC discovery;	2.70	410.00	1,107.00

**TOTAL FEES**

**\$ 5,371.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Atty</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Martin S. Friedman	MSF	13.10	410.00	5,371.00
<b>Total</b>		<b>13.10</b>		<b>\$ 5,371.00</b>

**EXPENSES**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
	FREIGHT (EXPRESS DELIVERY)	28.15
	<b>TOTAL EXPENSES</b>	<b>\$ 28.15</b>
	<b>TOTAL THIS INVOICE</b>	<b>\$ 5,399.15</b>



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[deanmead.com](http://deanmead.com)  
Fed Tax ID#59-2049716

Pluris Wedgefield, LLC  
5950 Berkshire Ln, Ste. 800  
Dallas, TX 75225

January 17, 2024  
Invoice No. 439920  
Billing Attorney: MSF

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## REMITTANCE ADVICE

**Client.Matter No.: 037195.1000235**

**RE: 2022 Test Year Rate Case**

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**BALANCE DUE THIS INVOICE**

**\$ 5,399.15**

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**All checks should be made payable to:**  
(Please return this advice with payment.)

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Orlando, Florida 32802-2346

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*Please reference: Invoice No. 439920, Client.Matter No.: 037195.1000235*

**INVOICES ARE PAYABLE UPON RECEIPT**



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Pluris Wedgefield, LLC  
5950 Berkshire Ln, Ste. 800  
Dallas, TX 75225

December 19, 2023  
Invoice No. 437285  
Billing Attorney: MSF

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## INVOICE SUMMARY

For Professional Services Rendered through December 15, 2023

**Client.Matter No.: 037195.1000235**

**RE: 2022 Test Year Rate Case**

Total Fees	\$ 9,512.00
Total Expenses	<u>\$ 556.55</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 10,068.55</b>

# DEAN|MEAD

Client No.: 037195  
Matter No.: 1000235

December 19, 2023  
Invoice No. 437285

## PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Rate	Amount
11/16/23	MSF	Review, research and respond to request from PSC attorney Watrous; Review and comment on draft audit response;	.30	410.00	123.00
11/17/23	MSF	Review OPC Notice of Intervention and email to client; Call to OPC for email addresses not included in the Notice; Review and analyze letter from OPC regarding its opinion on interim rates; Review and comment on several proposed responses to audit requests; Telephone conference with Mr. Gallarda who telephoned ; review OPC discovery and emails regarding same;	1.20	410.00	492.00
11/18/23	MSF	Research and draft Response to OPC Request for Production; Research and draft Confidentiality Agreement and email to OPC attorney; RD Notice of Service	1.00	410.00	410.00
11/20/23	MSF	Review and comment on numerous draft audit response and follow-up correspondence with Mr. Gallarda;	.30	410.00	123.00
11/21/23	MSF	Review Staff Recommendation on interim rates and correspondence with Mr. Gallarda and Mr. Winters; Telephone conference with Mr. Gallarda who telephoned to discuss Interim Recommendation; Research and draft Corporate Undertaking, and Corporate Guarantee; Research and draft Combined Interim Rate and Initial Customer Notice; Review and comment on draft audit request response; Correspondence with OPC regarding confidential document; Research and draft Customer Meeting Notice and email with Staff;	2.90	410.00	1,189.00
11/29/23	MSF	Research and draft Motion for Temporary Protective Order with regard to OPC POD #1.and efile; Review and comment on several draft Audit request response; initial review of OPC's first Interrogatories and draft email to client; Telephone conference with OPC Trierweiler who telephoned to discuss interim rates; Begin draft of responses;	1.80	410.00	738.00
11/30/23	MSF	Review and comment to Mr. Gallarda on OPC letter on Interim Rate Recommendation; follow-up call from Mr. Gallarda; Telephone conference with PSC attorney who telephoned to discuss OPC's letter;	.50	410.00	205.00
12/04/23	MSF	Review oral modification and several Telephone conferences with several Staff members; Telephone conference with Mr. Winters; Travel to Tallahassee for Florida Public Service Commission Conference; Review and comment on Audit Request response;	5.00	410.00	2,050.00
12/05/23	MSF	Attend Florida Public Service Commission Conference and Return to New Smyrna Beach office; Telephone conference with Mr. Gallarda;	6.40	410.00	2,624.00

# DEAN|MEAD

Client No.: 037195  
 Matter No.: 1000235

December 19, 2023  
 Invoice No. 437285

Date	Atty	Description	Hours	Rate	Amount
12/06/23	MSF	Telephone conference with Ms. Norris of PSC staff who telephoned regarding customer meeting; draft affidavit of mailing and email to Ms. Yopp with combined interim & initial customer notice; Review and comment on draft responses to OPC Interrogatories;	.70	410.00	287.00
12/08/23	MSF	Review Staff's second data request, draft response template and correspondence with Mr. Winters;	.20	410.00	82.00
12/11/23	MSF	Several Telephone conference with staff members; Telephone conferences with Mr. Gallarda, Mr. Kuhns and golf club owner regarding customer meeting;	.30	410.00	123.00
12/12/23	MSF	Review, research and respond to Mr. Winters regarding audit request for confidential documents; begin draft of Request for Confidential Classification and redact and highlight documents;	1.20	410.00	492.00
12/13/23	MSF	Review and comment on proposed audit responses.	.20	410.00	82.00
12/14/23	MSF	Review and comment on several draft audit request responses; Telephone conference with Mr. Maurey and Ms. Norris of PSC staff/wt regarding customer meeting; revise customer meeting notice accordingly; Initial review and comment on some draft responses to OPC's 1st Ilogs;	.60	410.00	246.00
12/15/23	MSF	Continue Review and comment on draft responses to OPC 1st Ilogs; Review and comment audit request response; Research and draft letter to PSC Clerk waiving 5-month deadline; Telephone conference with and email from Mr. Maurey regarding customer meeting time and date; draft affidavit of Mailing customer notice and correspondence with Ms. Yopp;	.60	410.00	246.00
<b>TOTAL FEES</b>					<b>\$ 9,512.00</b>

## SUMMARY OF PROFESSIONAL SERVICES

Name	Atty	Hours	Rate	Total
Martin S. Friedman	MSF	23.20	410.00	9,512.00
<b>Total</b>		<b>23.20</b>		<b>\$ 9,512.00</b>

## EXPENSES

Date	Description	Amount
12/11/23	Travel to Tallahassee for PSC Meeting 037195/1000235 MSF	548.00
	POSTAGE	8.55
<b>TOTAL EXPENSES</b>		<b>\$ 556.55</b>

# DEAN|MEAD

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Client No.: 037195  
Matter No.: 1000235

December 19, 2023  
Invoice No. 437285

**TOTAL THIS INVOICE**

**\$ 10,068.55**



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Dallas, TX 75225

December 19, 2023  
Invoice No. 437285  
Billing Attorney: MSF

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## REMITTANCE ADVICE

Client.Matter No.: 037195.1000235

RE: 2022 Test Year Rate Case

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**BALANCE DUE THIS INVOICE**

**\$ 10,068.55**

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**All checks should be made payable to:**  
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Please reference: Invoice No. 437285, Client.Matter No.: 037195.1000235

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Dallas, TX 75225

November 16, 2023  
Invoice No. 433808  
Billing Attorney: MSF

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## INVOICE SUMMARY

For Professional Services Rendered through November 15, 2023

**Client.Matter No.: 037195.1000235**

**RE: 2022 Test Year Rate Case**

Total Fees	\$ 4,100.00
Total Expenses	<u>          \$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 4,100.00</b>



# DEAN|MEAD

Client No.: 037195  
Matter No.: 1000235

November 16, 2023  
Invoice No. 433808

## PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Rate	Amount
10/18/23	MSF	Review and comment on proposed responses to recent audit requests;	.20	410.00	82.00
10/19/23	MSF	Review deficiency letter and correspondence with Mr. Gallarda and Mr. Winters; Begin research and draft of responses; Telephone conference with Mr. Winters. compile and email documents to Mr. Winters;	1.60	410.00	656.00
10/20/23	MSF	Review, research and respond to Mr Winters' response to audit request;	.30	410.00	123.00
10/20/23	MSF	Telephone conference with Mr. Winters who telephoned; research and email files to Mr. Winters; follow-up Telephone conference with Mr. Winters and draft response to deficiency letter;	.70	410.00	287.00
10/23/23	MSF	Review and comment to Mr. Winters and Mr. Gallarda on OPC letter to staff, and OPC participation in general; brief Telephone conference with Ms. Norris and Mr. Swards who telephoned regarding interim rates;	.30	410.00	123.00
10/24/23	MSF	Review and comment on audit request and responses;	.20	410.00	82.00
10/26/23	MSF	Review, comment and revise deficiency responses based upon Telephone conference with Mr. Winters, format and e-file; compile documents and email to Mr. Swards;	.40	410.00	164.00
10/27/23	MSF	Review and comment on several proposed responses to audit requests	.20	410.00	82.00
10/30/23	MSF	Review and comment proposed audit requests; Review staff's 1st Data Request and correspondence with Mr. Winters and others; Begin draft of responses to Staff's 1st data request;	1.10	410.00	451.00
10/31/23	MSF	Continue preparation of data request responses including Telephone conference with Mr. Winters; Review and comment several audit responses;	.90	410.00	369.00
11/02/23	MSF	Continue research, review and preparation of responses to staff's first data request;	1.20	410.00	492.00
11/03/23	MSF	Research and draft Request for Confidential Classification of salaries and letter to Public Service Commission Clerk; format, compile and efile responses to First data request; draft letter to Commission Clerk;	1.20	410.00	492.00
11/06/23	MSF	Review and comment audit request and responses; review email from Mr. Swards approving synopsis and email to Mr. Gallarda; Telephone conference with Ms. Norris who telephoned and email to Mr. Gallarda;	.30	410.00	123.00
11/07/23	MSF	Review, research and provide response to newspaper;	.20	410.00	82.00
11/09/23	MSF	Research and draft Combined Interim Rate and Initial Customer Notice; Revise Synopsis;	1.00	410.00	410.00

# DEAN|MEAD

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Client No.: 037195  
Matter No.: 1000235

November 16, 2023  
Invoice No. 433808

<b>Date</b>	<b>Atty</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
11/15/23	MSF	Review and comment on proposed response to audit request	.20	410.00	82.00
<b>TOTAL FEES</b>					<b>\$ 4,100.00</b>

## SUMMARY OF PROFESSIONAL SERVICES

<b>Name</b>	<b>Atty</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Martin S. Friedman	MSF	10.00	410.00	4,100.00
<b>Total</b>		<b>10.00</b>		<b>\$ 4,100.00</b>

**TOTAL THIS INVOICE** **\$ 4,100.00**



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Fed Tax ID#59-2049716

Pluris Wedgefield, LLC  
5950 Berkshire Ln, Ste. 800  
Dallas, TX 75225

November 16, 2023  
Invoice No. 433808  
Billing Attorney: MSF

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## REMITTANCE ADVICE

Client.Matter No.: 037195.1000235

RE: 2022 Test Year Rate Case

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**BALANCE DUE THIS INVOICE**

**\$ 4,100.00**

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Please reference: Invoice No. 433808, Client.Matter No.: 037195.1000235

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Dallas, TX 75225

October 17, 2023  
Invoice No. 430791  
Billing Attorney: MSF

---

## INVOICE SUMMARY

For Professional Services Rendered through October 15, 2023

**Client.Matter No.: 037195.1000235**

**RE: 2022 Test Year Rate Case**

Total Fees	\$ 2,583.00
Total Expenses	<u>\$ 282.76</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 2,865.76</b>

# DEAN|MEAD

Client No.: 037195  
Matter No.: 1000235

October 17, 2023  
Invoice No. 430791

## PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Rate	Amount
9/20/23	MSF	Telephone conference with Mr. Gallarda who telephoned regarding pro forma project; review and incorporate proforma project and documentation in Application and engineering exhibit;	.30	410.00	123.00
9/21/23	MSF	Review and comment draft financial MFRs and format for filing; Finalize Application and format for filing;	1.10	410.00	451.00
9/22/23	MSF	Electronic Filing of Letter to Clerk, Application and three Volumes of MFRs; E-mail to Mr. Maurey; Draft letter to CEO of Orange County;	.30	410.00	123.00
9/23/23	MSF	Bind and index paper copies for filing of ten Volume I, two Volume II and two Volume II; box up and deliver (time adjusted to paralegal rate)	1.00	410.00	410.00
9/26/23	MSF	Correspondence with Mr. Gallarda regarding interim rate deadline waiver; draft and efile letter; Research and draft Synopsis;	1.20	410.00	492.00
10/02/23	MSF	Finalize draft of Synopsis and email to PSC staff;	.30	410.00	123.00
10/04/23	MSF	Review and comment on staff audit requests;	.20	410.00	82.00
10/05/23	MSF	Telephone conference with Mr. Swards of PSC staff who telephoned regarding interim rates and correspondence with Mr., Gallarda;	.20	410.00	82.00
10/06/23	MSF	Review, research and respond to correspondence from Mr. Winters regarding interim and final rate issues; Telephone conference with Mr. Buys of the PSC staff who telephoned regarding security for refund;	.30	410.00	123.00
10/08/23	MSF	Review draft responses to staff audit requests in preparation for call with Mr. Winters and Mr. Gallarda; research files for required documents and email to Mr. Winters;	.80	410.00	328.00
10/09/23	MSF	Prepare for and Telephone conference with Mr. Gallarda and Mr. Winters regarding audit responses; Telephone conference with Mr. Buys of PSC staff who telephoned regarding interim rate security; Telephone conference with Mr. Winters;	.60	410.00	246.00
<b>TOTAL FEES</b>					<b>\$ 2,583.00</b>

## SUMMARY OF PROFESSIONAL SERVICES

Name	Atty	Hours	Rate	Total
Martin S. Friedman	MSF	6.30	410.00	2,583.00
<b>Total</b>		<b>6.30</b>		<b>\$ 2,583.00</b>

# DEAN|MEAD

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Client No.: 037195  
Matter No.: 1000235

October 17, 2023  
Invoice No. 430791

## EXPENSES

<b>Date</b>	<b>Description</b>	<b>Amount</b>
9/25/23	Outside Printing and Rate Case Filing Supplies 037195/1000235	282.76
	<b>TOTAL EXPENSES</b>	<b>\$ 282.76</b>
	<b>TOTAL THIS INVOICE</b>	<b>\$ 2,865.76</b>



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Dallas, TX 75225

October 17, 2023  
Invoice No. 430791  
Billing Attorney: MSF

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## REMITTANCE ADVICE

Client.Matter No.: 037195.1000235

RE: 2022 Test Year Rate Case

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**BALANCE DUE THIS INVOICE**

**\$ 2,865.76**

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Dallas, TX 75225

September 20, 2023  
Invoice No. 429244  
Billing Attorney: MSF

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## INVOICE SUMMARY

For Professional Services Rendered through September 15, 2023

**Client.Matter No.: 037195.1000235**

**RE: 2022 Test Year Rate Case**

Total Fees	\$ 1,476.00
Total Expenses	<u>\$ 159.20</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 1,635.20</b>



# DEAN|MEAD

Client No.: 037195  
Matter No.: 1000235

September 20, 2023  
Invoice No. 429244

## PROFESSIONAL SERVICES

<b>Date</b>	<b>Atty</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
8/16/23	MSF	Telephone conference with Mr. Kuhns regarding engineering documents and complete update of engineering MFRs;	.50	410.00	205.00
8/23/23	MSF	Review, research and respond to several emails from Ms. Yopp, and Mr. Winters regarding MFRs;	1.00	410.00	410.00
8/24/23	MSF	Telephone conference with Mr. Winters regarding MFRs; Review and comment on revised MFRs and Billing Analysis;	.70	410.00	287.00
8/27/23	MSF	Review, research and respond to email from Mr. Gallarda;	.20	410.00	82.00
8/30/23	MSF	Review and comment on Mr. Gallarda correspondence with Commissioner; Review and comment on proposed notice to customers; follow-up correspondence with Mr. Gallarda;	.30	410.00	123.00
9/14/23	MSF	Review, compile and index hard copies of engineering MFRs;	.40	410.00	164.00
9/15/23	MSF	Finalize engineering MFRs for paper filing; compile and prepare billing analysis for paper filing; draft letter to clerk;	.50	410.00	205.00
<b>TOTAL FEES</b>					<b>\$ 1,476.00</b>

## SUMMARY OF PROFESSIONAL SERVICES

<b>Name</b>	<b>Atty</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Martin S. Friedman	MSF	3.60	410.00	1,476.00
<b>Total</b>		<b>3.60</b>		<b>\$ 1,476.00</b>

## EXPENSES

<b>Date</b>	<b>Description</b>	<b>Amount</b>
	COPYING EXPENSES (OUTSIDE OFFICE)	159.20
<b>TOTAL EXPENSES</b>		<b>\$ 159.20</b>
<b>TOTAL THIS INVOICE</b>		<b>\$ 1,635.20</b>



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5950 Berkshire Ln, Ste. 800  
Dallas, TX 75225

September 20, 2023  
Invoice No. 429244  
Billing Attorney: MSF

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## REMITTANCE ADVICE

Client.Matter No.: 037195.1000235

RE: 2022 Test Year Rate Case

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**BALANCE DUE THIS INVOICE**

**\$ 1,635.20**

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Pluris Wedgefield, LLC  
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Dallas, TX 75225

August 17, 2023  
Invoice No. 425321  
Billing Attorney: MSF

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## INVOICE SUMMARY

For Professional Services Rendered through August 15, 2023

**Client.Matter No.: 037195.1000235**

**RE: 2022 Test Year Rate Case**

Total Fees	\$ 2,255.00
Total Expenses	<u>          \$.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 2,255.00</b>

# DEAN|MEAD

Client No.: 037195  
Matter No.: 1000235

August 17, 2023  
Invoice No. 425321

## PROFESSIONAL SERVICES

<b>Date</b>	<b>Atty</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
7/17/23	MSF	Review and download and format engineering documents from Mr. Kuhns;	1.10	410.00	451.00
7/19/23	MSF	Complete review, download formatting and compiling engineering documents exhibit; telephone call with Mr. Kuhns;	2.20	410.00	902.00
8/02/23	MSF	Review draft of financial MFRs and Billing Analysis and provide comments to Mr. Winters;	.50	410.00	205.00
8/04/23	MSF	Telephone conference with Mr. Maurey who telephoned and follow-up correspondence with company representatives; Review letter and email to Mr. Maurey;	.20	410.00	82.00
8/07/23	MSF	Review and comment on revised financial MFRs;	.90	410.00	369.00
8/07/23	MSF	Telephone conference with Mr. Gallarda who telephoned to discuss meeting with Commissioner Bonilla;	.30	410.00	123.00
8/14/23	MSF	Review updated water quality analyses and replace same in engineering information;	.30	410.00	123.00

**TOTAL FEES**

**\$ 2,255.00**

## SUMMARY OF PROFESSIONAL SERVICES

<b>Name</b>	<b>Atty</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Martin S. Friedman	MSF	5.50	410.00	2,255.00
<b>Total</b>		<b>5.50</b>		<b>\$ 2,255.00</b>

**TOTAL THIS INVOICE**

**\$ 2,255.00**



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Dallas, TX 75225

August 17, 2023  
Invoice No. 425321  
Billing Attorney: MSF

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## REMITTANCE ADVICE

Client.Matter No.: 037195.1000235

RE: 2022 Test Year Rate Case

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**BALANCE DUE THIS INVOICE**

**\$ 2,255.00**

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Please reference: Invoice No. 425321, Client.Matter No.: 037195.1000235

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5950 Berkshire Ln, Ste. 800  
Dallas, TX 75225

July 18, 2023  
Invoice No. 423818  
Billing Attorney: MSF

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## INVOICE SUMMARY

For Professional Services Rendered through July 15, 2023

**Client.Matter No.: 037195.1000235**

**RE: 2022 Test Year Rate Case**

Total Fees	\$ 2,050.00
Total Expenses	<u>\$ 4,000.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 6,050.00</b>

# DEAN|MEAD

Client No.: 037195  
Matter No.: 1000235

July 18, 2023  
Invoice No. 423818

## PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Rate	Amount
7/10/23	MSF	Email to Mr. Maurey and Mr. Fletcher; Research and draft test year request and correspondence with Mr. Gallarda; Review documents and correspondence with Pluris staff regarding additional engineering documents required; revise and finalize test year request letter; Begin download and compilation of engineering documents/information and correspondence concerning same;	3.20	410.00	1,312.00
7/12/23	MSF	Telephone conference with Mr. Kuhns who telephoned; review engineering documents from Mr. Kuhns, download and format;	.40	410.00	164.00
7/13/23	MSF	Continue to review engineering documents and compile and format into engineering exhibit for filing;	1.40	410.00	574.00
<b>TOTAL FEES</b>					<b>\$ 2,050.00</b>

## SUMMARY OF PROFESSIONAL SERVICES

Name	Atty	Hours	Rate	Total
Martin S. Friedman	MSF	5.00	410.00	2,050.00
<b>Total</b>		<b>5.00</b>		<b>\$ 2,050.00</b>

## EXPENSES

Date	Description	Amount
7/19/23	Pluris Wedgefield/2022 TY Rate Case - PSC Rate Case Filing Fee 037195/1000235 MSF GS	4,000.00
<b>TOTAL EXPENSES</b>		<b>\$ 4,000.00</b>
<b>TOTAL THIS INVOICE</b>		<b>\$ 6,050.00</b>



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July 18, 2023  
Invoice No. 423818  
Billing Attorney: MSF

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## REMITTANCE ADVICE

Client.Matter No.: 037195.1000235

RE: 2022 Test Year Rate Case

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**BALANCE DUE THIS INVOICE**

**\$ 6,050.00**

---

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Please reference: Invoice No. 423818, Client.Matter No.: 037195.1000235

**INVOICES ARE PAYABLE UPON RECEIPT**



# Time Report

Unbilled

Pluris Wedgefield, Lic / 2022 Test Year Rate Case (037195-1000235)

02/01/2024

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
01/16/2024	0351	Martin S. Friedman	20	Of Counsel	1	0.80	328.00	410.00	0.80	328.00	410.00	10000		0	Unbilled
Review, finalize, efile and serve responses to staff's Third Data Request; Finalize, efile and serve Response to OPC Motion for Reconsideration and Request for Oral Argument;															
01/18/2024	0351	Martin S. Friedman	20	Of Counsel	1	1.60	656.00	410.00	1.60	656.00	410.00	10000		0	Unbilled
Research, draft and efile Notice of Service of Discovery Responses; Research and draft Motion for Temporary Protective Order; Review, finalize, and serve responses to OPC's Second Set of Interrogatories and Second Request for Production of Documents; Review Staff's Fourth Data request and draft response template and email with Mr. Winters;															
01/20/2024	0351	Martin S. Friedman	20	Of Counsel	1	0.20	82.00	410.00	0.20	82.00	410.00	10000		0	Unbilled
Review OPC Third Set of Interrogatories and Third Request for Production of Documents and correspondence with Mr. Gallarda and others;															
01/22/2024	0351	Martin S. Friedman	20	Of Counsel	1	1.80	738.00	410.00	1.80	738.00	410.00	10000		0	Unbilled
Draft templates for responses to OPC's Third Set of Interrogatories and begin draft of responses, and OPC's Third Request for Production of Documents; review Staff's Fifth Data Request and Correspondence with Mr. Gallarda and others; Begin research on response; Review and Incorporate OPC's Amended Third Set of Interrogatories, draft responses and Correspondence with client;															
01/23/2024	0351	Martin S. Friedman	20	Of Counsel	1	0.90	369.00	410.00	0.90	369.00	410.00	10000		0	Unbilled
Review and respond to correspondence from Mr. Gallarda regarding OPC Third Set of Interrogatories; Review Audit and email from Mr. Winters;															
01/24/2024	0351	Martin S. Friedman	20	Of Counsel	1	5.50	2,255.00	410.00	5.50	2,255.00	410.00	10000		0	Unbilled
Travel to Wedgefield for customer meeting; pre-meeting conference with Mr. Kuhns and representatives of OPC and Staff; Attend customer meeting and post-meeting conference with Mr. Kuhns and Mr. Gallarda; Assist in response to questions from reporter; Return to office;															
01/25/2024	0351	Martin S. Friedman	20	Of Counsel	1	0.30	123.00	410.00	0.30	123.00	410.00	10000		0	Unbilled
Review staff's sixth data request and Correspondence with Mr. Gallarda, Mr. Kuhns and Ms. Yopp. begin draft of response;															
01/27/2024	0351	Martin S. Friedman	20	Of Counsel	1	0.20	82.00	410.00	0.20	82.00	410.00	10000		0	Unbilled
Review Office of Public Counsel's Notice of Appeal of interim rate Order; research and email to Mr. Gallarda; email to Public Service Commission staff;															
01/29/2024	0351	Martin S. Friedman	20	Of Counsel	1	1.60	656.00	410.00	1.60	656.00	410.00	10000		0	Unbilled
Review approved interim tariff sheets and confirm consistency with Order and email to Ms. Yopp; Telephone conference with Mr. Kuhns regarding data request response; ; Telephone conference with Mr. Winters regarding data request response; Telephone conference with Public Service Commission Sunshine regarding Office of Public Counsel appeal; review customer meeting notes and begin responses to Staff's Sixth Data Request;															
01/30/2024	0351	Martin S. Friedman	20	Of Counsel	1	0.90	369.00	410.00	0.90	369.00	410.00	10000		0	Unbilled
Telephone conference with Ms. Bruce of the Public Service Commission who telephoned; Telephone conference with Ms. Yopp; review information from Ms. Yopp regarding data request responses; continue data request responses;															
01/31/2024	0351	Martin S. Friedman	20	Of Counsel	1	0.50	205.00	410.00	0.50	205.00	410.00	10000		0	Unbilled
Several Telephone conferences with Mr. Ellis and Mr. Davis who telephoned ; Telephone conference with Mr. Kuhns; review and comment on several drafts of Docketing Statement; revise 6th data request responses and email to Mr. Kuhns;															
<b>Report Totals:</b>						<b>14.30</b>	<b>5,863.00</b>		<b>14.30</b>	<b>5,863.00</b>					

# Cost Report

Unbilled

Pluris Wedgefield, Lic / 2022 Test Year Rate Case (037195-1000235)

02/01/2024

Date	SM/Task	Service Code	Description	Attorney	Orig Qty	Orig Amt	Rev Qty	Rev Amt	Vendor	Voucher	Check No.	Check Date	Check Status	Invoice	Status
01/25/2024		00032	TRAVEL EXPENSES	0351	0.00	102.82	0.00	102.82	Martin S. Friedman	2072359	999000577	01/30/2024		0	Unbilled
			Travel to Wedgefield for customer meeting 1/24/24 9121.3 miles @ \$0.67 (meal \$21.55) 037195/1000235 MSF												
<b>Report Totals:</b>					<b>0.00</b>	<b>102.82</b>	<b>0.00</b>	<b>102.82</b>							