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Public Service Commission

August 31, 2012

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COMMISSION
CLERK

Mr. Martin S. Friedman
Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, Florida 32746

Re: Docket No. 120152-WS - Application for increase in water and wastewater rates in Orange County by Pluris Wedgefield, Inc.

Dear Mr. Friedman:

Staff needs the following information to complete our review of the application filed by Pluris Wedgefield, Inc. (Pluris or Utility).

1. The following items relate to all proforma plant additions reflected on MFR Schedule A-3 and A-3(a). For each addition, provide the following:
 - (a) a statement why each addition is necessary;
 - (b) a copy of all invoices and other support documentation if the plant addition has been completed or in process;
 - (c) a copy of the signed contract or any bids, if the plant addition has not been completed;
 - (d) a status of the engineering and permitting efforts, if the plant addition has not been through the bidding processing;
 - (e) the projected in-service date for each outstanding plant addition, and
 - (f) all documentation (i.e. invoices) for the original cost of any corresponding retirements.
2. The following items relate to Pluris' requested rate case expense.
 - (a) For each individual person, in each firm providing consulting services to the applicant pertaining to this docket, provide the billing rate, and an itemized description of work performed. Please provide detail of hours worked associated with each activity. Also provide a description and associated cost for all expenses incurred to date.
 - (b) For each firm or consultant providing services for the applicant in this docket, please provide copies of all invoices for services provided to date.
 - (c) If rate consultant invoices are not broken down by hour, please provide reports that detail by hour, a description of actual duties performed, and amount incurred to date.

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- (d) Please provide an estimate of costs to complete the case by hour for each consultant or employee, including a description of estimated work to be performed, and detail of the estimated remaining expense to be incurred through the PAA process.
 - (e) Please provide an itemized list of all other costs estimated to be incurred through the PAA process.
3. The following items relate to MFR Schedule B-5 and B-6.
- (a) Contractual Services – Acct. increased substantially in May, September, October, and November 2011 when compared to other months. Please provide all of the Utility’s calculations, basis, workpapers, and support documentation for the above increase in Contractual Services – Acct.
 - (b) Contractual Services – Legal increased substantially in February and December 2011 when compared to other months. Please provide all of the Utility’s calculations, basis, workpapers, and support documentation for the above increase in Contractual Services – Legal.
 - (c) Contractual Services – Mgmt. Fees increased substantially in December 2011 when compared to other months. Please provide all of the Utility’s calculations, basis, workpapers, and support documentation for the above increase in Contractual Services – Mgmt. Fees.
 - (d) Contractual Services - Testing increased substantially from January 2011 to February 2011. Please provide all of the Utility’s calculations, basis, workpapers, and support documentation for the above increase in Contractual Services - Testing.
 - (e) Contractual Services – Other increased substantially in February and July 2011 when compared to other months. Please provide all of the Utility’s calculations, basis, workpapers, and support documentation for the above increase in Contractual Services – Other.
 - (f) Insurance – General Liability increased substantially in January and December 2011 when compared to other months. Please provide all of the Utility’s calculations, basis, workpapers, and support documentation for the above increase in Insurance – General Liability.
 - (g) Bad Debt Expense increased substantially in December 2011 when compared to other months. Please provide all of the Utility’s calculations, basis, workpapers, and support documentation for the above increase in Bad Debt Expense. In Pluris’ response to this request, please provide the Utility’s bad debt expense or accounts receivable write-off policy or procedures.
 - (h) Miscellaneous Expenses increased substantially in July, September, November and December 2011 when compared to other months. Please provide all of the Utility’s calculations, basis, workpapers, and support documentation for the above increase in Miscellaneous Expenses.
4. The following items relate to MFR Schedules B-7 and B-8.
- (a) Contractual Services – Other, provide a copy of all invoices with an invoice amount of \$1,000 or greater.

- (b) Miscellaneous Expense, provide a copy of all invoices with an invoice amount of \$1,000 or greater.
- 5. The following questions are in regard to MFR Schedule E-5, page 1 of 2, Miscellaneous Service Charge Revenues.
 - (a) Online Payment Fee: The Utility indicated it received \$7,906 from an online payment fee. The Utility's current tariff does not authorize the collection of an online payment fee. In this regard, please provide a response to the following:
 - (i) Please indicate the amount of the online payment fee per transaction.
 - (ii) Does the Utility remit the payment to a third party vendor? If so, please provide the name of the third party vendor as well as the vendor's fee per transaction. Also, please describe in detail the transaction between the Utility and the third party vendor.
 - (iii) Please provide the number of online payment transactions for the test year.
 - (iv) If the online payment fee is a Utility fee, please provide cost justification for the online payment fee.
 - (b) Late Fees: The Utility indicated it collected late fees in the amount of \$29,056 from its residential customer class.
 - (i) Please provide the number of bills late by system.
 - (ii) Please provide the percentage of bills late to total bills by system.
 - (iii) Also, does the Utility have any insight as to why it is experiencing its level of late payments? If so, please explain in detail.
 - (c) Miscellaneous Fees: The Utility collected miscellaneous fees in the amount of \$299. Please provide a detailed breakdown of this amount.
 - (d) Penalties: Please explain in detail why the Utility has offset miscellaneous service revenues by penalties in the amount of \$12,595. Further, please provide a detailed breakdown of the penalties.
 - (e) Accruals: Please provide a detailed breakdown of the accruals.
- 6. The following items relate to the Department of Environmental Protection (DEP) Compliance Inspection Reports in MFR Volume III. Based on the 2011 inspection reports the wastewater treatment plant is currently out of compliance, please provide information pertaining to the following:
 - (a) Have the non-compliance issues noted in both DEP Compliance Inspection Reports been corrected? If so, when, if not, why?
 - (b) Has the wastewater treatment plant come into compliance with DEP? If so when, if not why not?
- 7. The following item relate to the Detailed Maps in MFR Volume III.
 - (a) Please provide size, type and total length of pipe for both the water and wastewater collection systems.

Mr. Martin S. Friedman
Page 4
August 31, 2012

Please submit the above information to the Office of Commission Clerk no later than October 1, 2012. If you have any questions, please contact me by phone at (850) 413-6435 or by e-mail at avanesse@psc.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads "Ana VanEsselstine". The signature is written in black ink and is centered on the page.

Ana VanEsselstine
Regulatory Analyst II

cc: Division of Accounting and Finance (Fletcher, Maurey)
Division of Auditing and Performance Analysis (Daniel, Hill-Slaughter)
Division of Economics (Hudson, Kummer, Thompson)
Division of Engineering (Ballinger, McRoy)
Office of the General Counsel (Lawson, Crawford)
Office of Commission Clerk (Docket No. 120152-WS)