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September 14, 2012

COMMISSION CLERK

Patti Daniel, Bureau Chief Office of Accounting and Performance Analysis c/o Ann Cole, Commission Clerk Florida Public Service Commission ("PSC") 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

150535-002

Re: Request for authorization to maintain accounting records outside of the State of Florida, pursuant to Rule 25-30.1l0(1)(b),F.A.C., by Pluris Wedgefield, Inc.

Dear Ms. Daniel:

Pluris Wedgefield, Inc. ("Pluris") has received your letter dated September 11, 2012 in regards to the above referenced matter. In your letter you requested additional information and Pluris is responding to the two questions below. For convenience we have reproduced the questions and responses follow immediately below in blue highlighted text.

- 1. Describe when and under what circumstances the Utility determined that its records were to be kept outside of Florida
 - Pluris has only one PSC regulated utility within the state. Pluris owns 3 other utilities in Florida, all of which are county jurisdictional utilities and another utility in North Carolina regulated by the North Carolina Utilities Commission. All of the records related to these utilities are kept in the Pluris Holdings, LLC corporate office in Dallas, Texas. All accounts payable and accounts receivables are handled in the corporate office and it is practical that all records be kept there. Duplicate records would require additional time and material costs which would not benefit the Pluris Wedgefield, Inc. customers. Locating an accounting office for Pluris Wedgefield, Inc. customers would also be detrimental to customers.
- 2. Describe the process by which staff will be provided access to the Utility's accounting records.

Pluris will provide documents electronically and to the extent a visit to the Pluris corporate office in Dallas is necessary by the auditors, Pluris Wedgefield will reimburse travel expenses as required by PSC Rules.

Should you have any questions please do not hesitate to contact me directly at 214.220.3413.

Sincerely,

Dan Winters Corporate Controller DOCUMENT NUMBER - DATE

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PLURIS 2100 McKinney Ave., Suite 1550 Dallas, TX 75201



Patti Daniel, Bureau Chief clo Ann Colo, Commission Clerk Florida PSC 2540 Schumard Oak Blud. Tellahassee, FL 32399, -0850

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