

REDACTED**Eric Fryson**

From: Dana Rudolf [drudolf@sfflaw.com]
Sent: Monday, February 11, 2013 4:48 PM
To: Filings@psc.state.fl.us
Cc: Martin Friedman; 'Maurice W. Gallarda (mgallarda@plurisusa.com)'; Ana VanEsselstine; Bart Fletcher; 'reilly.steve@leg.state.fl.us'; Michael Lawson
Subject: Docket No. 120152-WS; Pluris Wedgefield, Inc. 2012 General Rate Increase Application

Attachments: PSC Clerk 18 (Call Center Documentation)(REDACTED).docx.pdf

- a) Martin S. Friedman, Esquire
 Sundstrom, Friedman & Fumero, LLP
 766 North Sun Drive, Suite 4030
 Lake Mary, FL 32746
 (407) 830-6331
mfriedman@sfflaw.com

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 00826-13, which
 is in locked storage. You must be
 authorized to view this DN.-CLK

- b) Docket No. 120152-WS
 Pluris Wedgefield, Inc. 2012 General Rate Increase Application
- c) Pluris Wedgefield, Inc.
- d) 7 pages
- e) Response to Staff's informal data request regarding the call center employees

DOCUMENT NUMBER-DATE

00809 FEB 11 2013

FPSC-COMMISSION CLERK

2/11/2013

SUNDSTROM,
FRIEDMAN & FUMERO, LLP

Attorneys | Counselors



766 NORTH SUN DRIVE
SUITE 4030
LAKE MARY, FLORIDA 32746

PHONE (407) 830-6331
FAX (407) 830-8522

www.sfllaw.com

February 11, 2013
Via Overnight Delivery – confidential copy
Electronic filing – redacted copy

Ms. Ann Cole, Commission Clerk
Office of Commission Clerk
Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 120152-WS- Application for increase in water and wastewater rates in
Orange County by Pluris Wedgefield, Inc.
Our File No.: 43085.15

Dear Ms. Cole:

Enclosed is Pluris Wedgefield, Inc.'s ("Utility") response to Staff's informal data request regarding the call center employees. Also enclosed is the Utility's Request for Confidential Classification regarding the call center employee's salaries.

Should you or Staff have any questions, please do not hesitate to contact me.

Very truly yours,

MARTIN S. FRIEDMAN
For the Firm

MSF/der
Enclosures

cc: Maurice Gallarda (via e-mail w/redacted copy)
Ana VanEsselstine (via e-mail w/redacted copy)
Bart Fletcher (via e-mail w/redacted copy)
Steve Reilly, Esquire (via email w/redacted copy)
Michael Lawson, Esquire (via email w/redacted copy)

DOCUMENT NUMBER-DATE

00809 FEB 11 2

Pluris reviewed the MFRs in regards to determining whether the Customer Care Center personnel costs had been included. It was determined that the costs were not included in the corporate costs and allocated in accordance with the Florida Public Service Commission's ("FPSC") methodology using Equivalent Residential Connections ("ERCs")

The MFRs were filed prior to the Customer Call Center services being performed by Pluris. Utility Partners ("UP") provided the services up to the end of 2011. UP charged each of the Pluris utilities for billing and collections based on the following table and attached, as a PDF is a letter from UP substantiating the methodology summarized in the following table.

Utility	Customers	% of Total	Allocation
Pluris Eastlake, Inc.	881	11.00%	\$ 29,837
Pluris PCU, Inc.	1,388	13.41%	\$ 36,368
Pluris Southgate, Inc.	4,492	41.00%	\$ 111,209
Pluris Wedgefield, Inc.	1,552	14.99%	\$ 40,665
Pluris, LLC	2,039	19.70%	\$ 53,426
Total	10,352	100.00%	\$ 271,505

UP did not use the FPSC methodology but rather the number of customers, not taking into account whether the utility provided both water and wastewater services. As stated in the table Pluris Wedgefield, Inc. was charged \$40,665 for the test year as its allocation. Had UP used the FPSC allocation method the Pluris Wedgefield, Inc. amount would have been higher and Pluris, LLC and Pluris Southgate, Inc.'s allocations lower since these utilities provide only wastewater and water services respectively.

Presented in the following table is a current summary of what the total Pluris Customer Care Center personnel costs were for the entire 2012 fiscal year.

Employee	Salary	Payroll tax expense	Employee benefits	Total
Brook Duff	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
Erica Gandy	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
Kristy Hairston	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
Amelia Moore	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
Beverly Yopp	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
Valerie Thomas	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
Joyce Scott	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
Total	\$ 187,716	\$ 16,016	\$ 45,961	\$ 249,694

Based on the FPSC allocation methodology, the salary allocation for Pluris Wedgefield, Inc. of 30.21% results in an allocated amount of \$75,432 a year for the Customer Care Center labor costs. The UP O&M expense should be reduced by \$40,665 and \$75,432 added to Pluris Wedgefield, Inc.'s allocation resulting in a net proforma increase in expense of \$34,767 (\$75,432 - \$40,665).



January 30, 2013

Mr. Maurice W. Gallarda, P.E.
Pluris Holdings, LLC
2100 McKinney Avenue, Suite 1550
Dallas, TX 75201

Dear Mr. Gallarda,

I am writing in order to explain the cost basis for the Customer Care center charges. The Customer Care team supported five utilities owned by Pluris Holdings, but were employees of Utility Partners. Initially we set out to establish an allocation where each utility would be charged based upon its number of customers. We did, however, slightly adjust the percentage allocations for East Lake and Southgate based upon call volume by each utility's customers.

The below table illustrates how the Customer Care center costs were allocated and charged to Pluris.

	Customers	% of Total	Allocation
East Lake	881	11.00%	\$ 29,837
Pebble Creek	1,388	13.41%	\$ 36,368
Southgate	4,492	41.00%	\$ 111,209
Wedgefield	1,552	14.99%	\$ 40,665
North Topsail	2,039	19.70%	\$ 53,426
	<u>10,352</u>	<u>100%</u>	<u>\$ 271,505</u>

If you have any questions, please do not hesitate to contact me. As always, we are grateful for our relationship and stand ready to assist in any manner possible.

Kind Regards,

//electronic

Greg Bishop
Business Manager

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of
PLURIS WEDGEFIELD, INC.
for an increase in water and wastewater
rates in Orange County, Florida

DOCKET NO. 120152-WS

**PLURIS WEDGEFIELD, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

PLURIS WEDGEFIELD, INC. (the "Utility"), by and through its undersigned counsel, files this Request for Confidential Classification in relation to the Utility's response to Staff's informal Data Request regarding call center employee cost filed with the Clerk electronically on February 11, 2013 in redacted form.

1. Pursuant to Section 367.156, Florida Statutes, this Commission has the authority to classify certain material as proprietary confidential business information. This classification exempts the material from public disclosure under Section 119.07(1), Florida Statutes.

2. The Utility requests that certain information provided to Staff in the summary of call center employee costs be classified as proprietary confidential business information under Section 367.156(2), Florida Statutes, and Rule 25-22.06, Florida Administrative Code (the "Confidential Information"). If this request is granted, then the subject portions of said response to will be exempt from Section 119.07(1), Florida Statutes. Attached hereto as Exhibit "A" is a Justification Matrix providing a justification for the Utility's request. The information is filed herewith in both highlighted and redacted format.

3. The information produced includes employee compensation information which is intended to be and is treated by the Utility as private and confidential and has not been disclosed externally and has been strictly controlled internally.

4. A portion of the information consists of employee's salary, benefits, taxes, and total compensation. This information should be classified as proprietary confidential business

information because its disclosure would impair the Utility's competitive interests, provide other utility companies information to lure employees away (thereby driving up salaries and rates), and create circumstances under which infighting and employee morale could be negatively affected. See Florida Power & Light Company et al. v. Public Service Commission, 31 So. 3d 860 (Fla. 1st DCA 2010). This Commission has routinely protected salary information since this opinion was rendered.

5. . . . Requiring the disclosure of each employee's compensation information violates each employee's right to privacy under Article I, Section 23 of the Florida Constitution.

WHEREFORE, PLURIS WEDGEFIELD, INC. prays for the entry of an order treating the information identified in this Motion as confidential and exempt from disclosure.

Respectfully submitted this 11th day of
February, 2013, by:

Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, FL 32746
Phone: (407) 830-6331
Fax: (407) 830-8522
mfriedman@sflaw.com



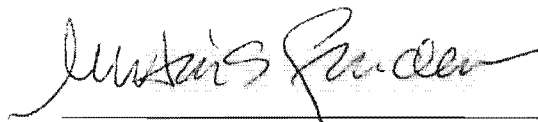
MARTIN S. FRIEDMAN
Florida Bar No.: 0199060
For the Firm

CERTIFICATE OF SERVICE
DOCKET NO. 120152-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been sent to the PSC Clerk efiled in redacted format and by overnight delivery in confidential format, and furnished by U.S. Mail to the following parties this 11th day of February, 2013:

Stephen Reilly, Associate Public Counsel
Office of Public Counsel
C/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Michael Lawson, Senior Attorney
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



MARTIN S. FRIEDMAN
For the Firm

JUSTIFICATION MATRIX

<p><u>Location</u> (Specific request w/page number)</p>	<p><u>Justification</u> <i>Please note: All information for which the Utility requests confidential treatment has been kept confidential by the Utility, and intends to keep such information confidential.</i></p>
<p>CUSTOMER CARE PERSONNEL COSTS (All of the amounts Salary, Payroll tax expense, employee benefits and Total columns for each listed employee in the chart)</p>	<p>§367.156(3)(d) Disclosure of compensation data, overtime data and salary increase data would impair the ability of the Utility to contract for employees on favorable terms.</p> <p>§367.156(3)(e) Disclosure of the compensation data would impair the Utility's competitive interests as described in <u>Florida Power & Light Company et al. v. Public Service Commission</u>, 31 So. 3d 860 (Fla. 1st DCA 2010). The Utility keeps this information strictly confidential to prevent other utilities from stealing their employees and to prevent lowered morale and infighting among employees who have the same position but varying wages.</p> <p>Article I, Section 23 of the Florida Constitution. Disclosure of the information would invade the privacy rights of the employee.</p>