

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water and  
wastewater rates in Orange County by  
Pluris Wedgefield, LLC

Docket No. 20230083-WS

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Pluris Wedgefield, LLC (“*Applicant*”), by and through its undersigned attorneys and pursuant to Rule 25-22.006(4), Florida Administrative Code (“*FAC*”) and Section 367.156, Florida Statutes, hereby requests confidential classification of certain financial information provided by the Applicant to the auditors in response to Audit Request No. 47, and in support shows as follows:

1. Audit Request No. 47 requests “the Parent Company’s Tax Returns for 2019, 2020, 2021 and 2022” (“*Tax Returns*”). Applicant is providing the requested Tax Returns (“*Confidential information*”) of its parent, Pluris Holdings, LLC in response to this audit request, although Applicant is unaware of the purpose for which they were requested.

2. The Applicant seeks to have the Confidential Information classified as confidential pursuant to Rule 25-22.006(3), FAC. The Confidential Information should not be made available for inspection and examination by the public under Section 119.07(1), Florida Statutes, for the following reasons:

A. The ownership interests in Pluris Holdings are closely held and not publicly traded and the Confidential Information is not available to the public.

B. It is not necessary to make the Confidential Information available to the public, and the public will not be harmed in any way by withholding the Confidential Information from public disclosure.

C. The Confidential Information includes financial and other information regarding other affiliates of Pluris Holdings which is irrelevant to the determinations to be made by the Commission Staff in connection with the Application and which the Commission does not require in order to discharge its duties and responsibilities.

D. The Confidential Information is not intended to be, nor is it, treated by Pluris

Holdings as anything but private and confidential information, and has not been disclosed except pursuant to statutory provision, order of a court or administrative body or private agreement that provides that it will not be released to the public.

E. Disclosure of the Confidential Information would cause harm to the owners of Pluris Holdings and business operations of Pluris Holdings.

F. Disclosure of the Confidential Information would negatively affect the way Pluris Holdings' business plans and strategies are carried out.

4. Exhibit "A" to this Request is a "Justification Table" which specifies what information in the Confidential Information the Applicant asks the Commission to classify as confidential and the statutory justification for the request in compliance with Rule 25-22.006(4)(a), (b) and (c), FAC; one highlighted copy and one redacted copy of the Confidential Information.

WHEREFORE, Pluris Wedgefield, LLC respectfully requests that the Commission determine that the Confidential Information is entitled to confidential treatment pursuant to Section 367.156, Florida Statutes, and Rule 25-22.006, FAC, and exempt the Confidential Information from public inspection and examination.

Respectfully submitted on this 18<sup>th</sup> day of December, 2023, by:

Dean Mead  
420 S. Orange Ave., Suite 700  
Orlando, FL 32801  
Telephone: (407) 310-2077  
Fax: (407) 423-1831  
[mfriedman@deanmead.com](mailto:mfriedman@deanmead.com)

/s/Martin S. Friedman  
MARTIN S. FRIEDMAN

**Exhibit "A"**  
**JUSTIFICATION MATRIX**

Location (Document name and location of information)	Justification
<p><b><u>All Tax Returns</u></b></p> <p><b><u>Location:</u></b> All information other than the filing party information at the top of the first page</p>	<p>§367.156(3)(a),(b),(d) &amp; (e): As set forth in the Request and the disclosure of the Tax Returns of Pluris Holdings, LLC, which is not a public company and is not subject to public disclosure of its financial statements would impair its competitive interests, could be used to discern trade secrets, or harm its ability to contract for goods and services on a favorable basis. Pluris Holdings LLC, keeps this information strictly confidential also to prevent competitors and prospective counterparties from information which could be used in future negotiations to the disadvantage of Pluris Holdings, LLC, and its affiliates.</p>

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

E-mail to the following parties this 18<sup>th</sup> day of December, 2023:

Walt Trierweiler, Esquire  
Octavio Simoes-Ponce, Esquire  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400  
[trierweiler.walt@leg.state.fl.us](mailto:trierweiler.walt@leg.state.fl.us)  
[ponce.octavio@leg.state.fl.us](mailto:ponce.octavio@leg.state.fl.us)

Jennifer Crawford, Esquire  
Austin Watrous, Esquire  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us)  
[awatrous@psc.state.fl.us](mailto:awatrous@psc.state.fl.us)

/s/ Martin S. Friedman  
Martin S. Friedman

Form **1065**

EXTENSION GRANTED TO 09/15/20

# U.S. Return of Partnership Income

OMB No. 1545-0123

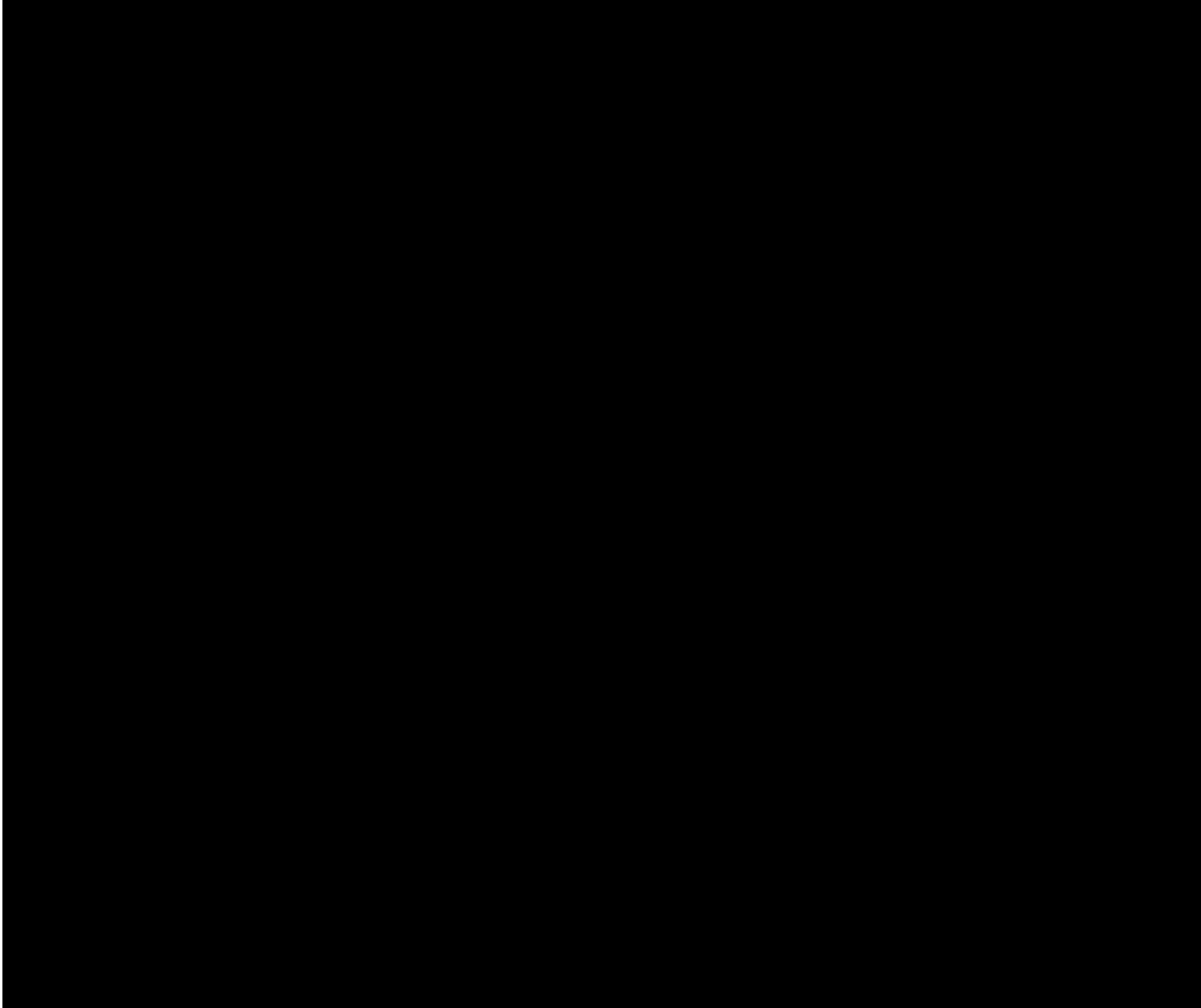
Department of the Treasury  
Internal Revenue Service

For calendar year 2019, or tax year beginning \_\_\_\_\_, \_\_\_\_\_, ending \_\_\_\_\_, \_\_\_\_\_

## 2019

▶ **Go to [www.irs.gov/Form1065](http://www.irs.gov/Form1065) for instructions and the latest information.**

<b>A</b> Principal business activity <b>WATER UTILITY</b>	Type or Print	Name of partnership <b>PLURIS HOLDINGS, LLC</b>	<b>D</b> Employer identification number <b>27-1580979</b>
<b>B</b> Principal product or service <b>WATER UTILITY</b>		Number, street, and room or suite no. If a P.O. box, see instructions. <b>5950 BERKSHIRE LANE, SUITE 800</b>	<b>E</b> Date business started <b>08/26/2009</b>
<b>C</b> Business code number <b>221300</b>		City or town, state or province, country, and ZIP or foreign postal code <b>DALLAS TX 75225</b>	<b>F</b> Total assets 



**Sign Here**

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than partner or limited liability company member) is based on all information of which preparer has any knowledge.

▶ \_\_\_\_\_ ▶ \_\_\_\_\_

Signature of partner or limited liability company member Date

May the IRS discuss this return with the preparer shown below? See instr.  **Yes**  **No**

<b>Paid Preparer Use Only</b>	Print/Type preparer's name <b>DAVID M. HARLAN</b>	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN <b>P00294830</b>
	Firm's name ▶ <b>MOSS ADAMS LLP</b>	Firm's EIN ▶ <b>91-0189318</b>			
	Firm's address ▶ <b>14555 DALLAS PARKWAY STE 300 DALLAS, TX 75254</b>			Phone no. <b>972-458-2296</b>	





































































































































































Form **1065**

EXTENSION GRANTED TO 09/15/21

# U.S. Return of Partnership Income

OMB No. 1545-0123

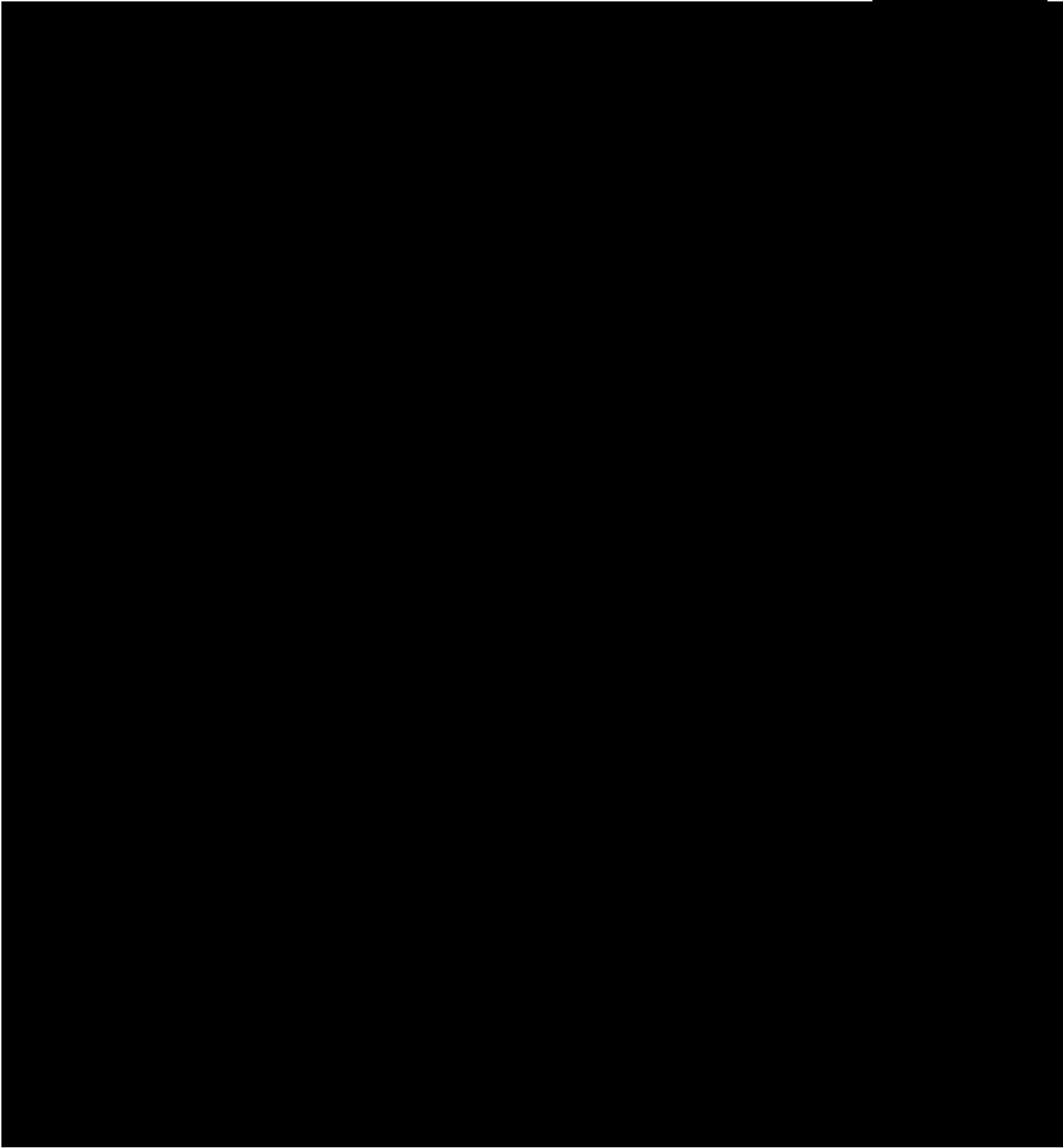
Department of the Treasury  
Internal Revenue Service

For calendar year 2020, or tax year beginning \_\_\_\_\_, \_\_\_\_\_, ending \_\_\_\_\_, \_\_\_\_\_.

**2020**

▶ Go to [www.irs.gov/Form1065](http://www.irs.gov/Form1065) for instructions and the latest information.

<b>A</b> Principal business activity  <b>WATER UTILITY</b>	<b>Type or Print</b>	Name of partnership  <b>PLURIS HOLDINGS, LLC</b>	<b>D</b> Employer identification number  <b>27-1580979</b>
<b>B</b> Principal product or service  <b>WATER UTILITY</b>		Number, street, and room or suite no. If a P.O. box, see instructions. <b>5950 BERKSHIRE LANE, SUITE 800</b>	<b>E</b> Date business started <b>08/26/2009</b>
<b>C</b> Business code number <b>221300</b>		City or town, state or province, country, and ZIP or foreign postal code <b>DALLAS TX 75225</b>	<b>F</b> Total assets




















































































































































































































































































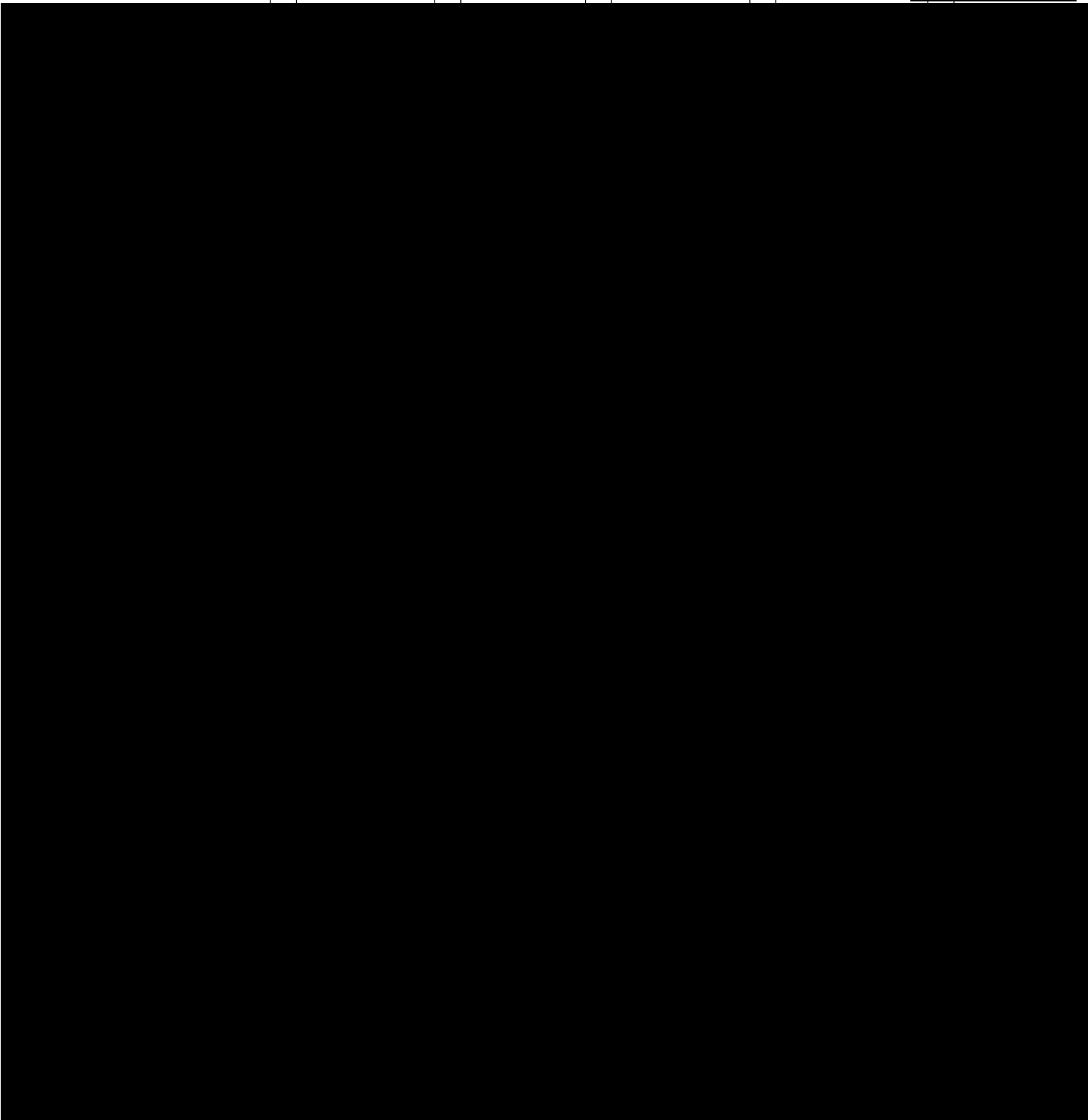


# U.S. Return of Partnership Income

For calendar year 2021, or tax year beginning \_\_\_\_\_, 2021, ending \_\_\_\_\_, 20\_\_\_\_\_.  
▶ Go to [www.irs.gov/Form1065](http://www.irs.gov/Form1065) for instructions and the latest information.

# 2021

<b>A</b> Principal business activity  WATER UTILITY	<b>Type</b> or <b>Print</b>	Name of partnership  PLURIS HOLDINGS, LLC	<b>D</b> Employer identification number  27-1580979
<b>B</b> Principal product or service  WATER UTILITY		Number, street, and room or suite no. If a P.O. box, see instructions.  5950 BERKSHIRE LANE, SUITE 800	<b>E</b> Date business started  08/26/2009
<b>C</b> Business code number  221300		City or town, state or province, country, and ZIP or foreign postal code  DALLAS, TX 75225	<b>F</b> Total assets (see instructions)  \$ 



































































































































**U.S. Return of Partnership Income**

For calendar year 2022, or tax year beginning \_\_\_\_\_, 2022, ending \_\_\_\_\_, 20\_\_\_\_.  
Go to [www.irs.gov/Form1065](http://www.irs.gov/Form1065) for instructions and the latest information.

**2022**

**A** Principal business activity

WATER UTILITY

**B** Principal product or service

WATER UTILITY

**C** Business code number

221300

Name of partnership

PLURIS HOLDINGS, LLC

Number, street, and room or suite no. If a P.O. box, see instructions.

5950 BERKSHIRE LANE, SUITE 800

City or town, state or province, country, and ZIP or foreign postal code

DALLAS, TX 75225

**D** Employer identification number

27-1580979

**E** Date business started

08/26/2009

**F** Total assets  
(see instructions)

\$







































































































































































































