Eric Fryson

From:

Dana Rudolf [drudolf@sfflaw.com]

Sent:

Wednesday, November 21, 2012 3:04 PM

To:

Filings@psc.state.fl.us

Cc:

Martin Friedman; mgallarda@plurisusa.com; dwinters@plurisusa.com; Ana VanEsselstine; Bart

Fletcher

Subject:

Docket No. 120152-WS; Pluris Wedgefield, Inc. 2012 General Rate Increase Application

Attachments: PSC Clerk 09 (2d Data Request Responses).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

- 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 Second Data Request.

766 NORTH SUN DRIVE SUITE 4030 LAKE MARY, FLORIDA 32746

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

> > www.sfflaw.com

November 21, 2012

VIA E-FILING

Ms. Ann Cole, Commission Clerk Office of Commission Clerk Public Service Commission 2540 Shumark 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:

The following is Pluris Wedgefield, Inc.'s ("Utility") response to Staff's Second Data Request dated November 5, 2012.

- 1. The following request relates to the online payment fee.
 - (a) Please indicate when Pluris began collecting the online payment fee.

<u>RESPONSE</u>: Pluris began collecting the online payment fee on October 28, 2010.

(b) Please provide a schedule showing the total amount of online payment fees collected by year since inception. For each year, please indicate the total number of online payments, how much the Utility retained of the online payment fee, and how much was remitted to the third party vendor.

DOCUMENT NUMBER-DATE

Ms. Ann Cole, Commission Clerk Office of Commission Clerk Public Service Commission November 21, 2012 Page 2

RESPONSE:

Pluris Online Payments Oct 28, 2010 through Aug 11, 2012					
	2010	2011	2012		
Online payments	488	4,251	4,533		
Fee collected	\$976	\$8,502	\$9,066		
Fee remitted to third party	\$597	\$4,823	\$5,044		
Fee retained by Pluris	\$379	\$3,679	\$4,022		

Pluris is designing a new website that plans to be implemented by November 30th. Due to the cost of integrating the online fee into the new website, the online payment fee was discontinued on August 11, 2012.

- 2. The following request relates the Utility's customer base.
 - (a) As indicated on MFR Schedule E-2, the Utility has slightly more water residential bills than wastewater bills. Please explain the difference in the number residential water and wastewater bills.

<u>RESPONSE</u>: There are six accounts that have only water residential service that are actually irrigation meters. Two accounts are currently inactive as the homeowner has chosen to not keep the irrigation account open. See the information below for these six accounts.

20668 Majestic St - inactive account - Acct # 01.00003930.00.0
2659 Abbey Ave - Felix Lopez - Acct # 01.00012120.00.5
2246 Abney Ave - Jack H King - Acct # 01.00012920.00.1
20515 Maxim Pkwy - Kathryn E Slayton - Acct # 01.00013700.00.0
20722 Melville St - Charles Zimmerman - Acct # 01.00016570.00.4
2809 Albion Ave - inactive account - Acct # 01.00018640.00.0

- (b) As indicated on MFR Schedule E-2, the Utility has more water general service bills than wastewater bills. Please explain the difference in the number general service water and wastewater bills.
 - RESPONSE: After looking into the detailed accounts that make up water general service, it was determined that 21 of the 31 total water general service accounts should be classified as irrigation service accounts. The detailed rate name for those accounts was labeled as Water General and should be changed to Irrigation. This led to the above referenced difference in bills on MFR Schedule E-2.
- (c) Please provide list of customer names separately for irrigation service, general service water, and general service wastewater.
 - <u>RESPONSE</u>: Please see the attached "List of Customers" for the requested breakdown by service type.
- 3. The following items relate to Pluris' requested rate case expense.
 - (a) In response to staff's first data request, the Utility provided an invoice for Tom Tekulve dated September 10, 2012, lists 13 hours for "rate case application and interrogatories review" preformed on July 24-25 and 31st. However, the rate case application was submitted on July 19th, staff determined the MFRs to be deficient on August 17th, and staff's first data request was sent on August 31, 2012. Please provide work breakdown of the work performed on July 24, 25 and 31, 2012.
 - RESPONSE: This invoice from Tom Tekulve was created using the same template he had used for a separate rate case. Although the hours were correct, the dates and description for that specific line item were partially incorrect. Pluris generally uses the term "interrogatory" as a description of work performed related to any PSC request, including the PSC audit that began on August 1, 2012. The

Ms. Ann Cole, Commission Clerk Office of Commission Clerk Public Service Commission November 21, 2012 Page 4

description of work performed more aptly should be stated as "Rate Case audit review" on August 7, August 8, and August 14. Please see the attached corrected invoice "Tom Tekulve Invoice".

(b) In response to staff's first data request, the Utility provided an invoice for Thomas Craig Company, LLP, dated August 8, 2012, in the amount of \$11,309.45 for the "review of FPSC Minimum Filing Requirements for application to increase rates for Pluris Wedgefield, Inc." Staff requested in its first data request a breakdown for each individual person, providing consulting services to the applicant pertaining to this docket, a billing rate, and an itemized description of work performed. Please provide detail of hours worked associated with each activity represented in this invoice.

<u>RESPONSE</u>: Please see the attached "Thomas Craig Rate Case Bill Detail" for detail of hours worked for Thomas Craig Company, LLP.

Should you 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 email)
Dan Winters (via email)
Ana Van Esselstine (via email)
Bart Fletcher (via email)

PLURIS WEDGEFIELD List of Customers

Detail Account	Detail Full Billing Name	Dotall Full Property Address	Detail Rate Name	Detail Service Name	Classification per MFR	Updated Classification
01-00000241-00-8	VILLAS AT WEDGEFELD	2517-2529 ALBION AVE IRRIG	YVV brig 5/4	We king - HewGen	hrig ation	krigalion
91-00000261-90-4	DIXON, REBECCÁ LYNN	2873 REGENCY OAK LIN IRRIG	We brig 5/8	Wir lang - HearGern	ingation	krigetion
91-00000271-00-7	UNSER, PHILIP	2835 BALLARD AVE	We trig 5 4	War larg - Heli-Glen	krigalion	krigation
91-00012980-00-9	RESERVES AT WEDGEFIELD	2013 SOUMERSET PINES DR	Wir Gen 1"	Wir General	Water General	inigation
01-00014340-00-3	RESERVES AT WEDGEFIELD HOA	3282 SCHWERSET PINES DR	Wir Gen 1*	We General	Water General	Irilgation
01-00018819-00-3	WEDGEFIELD HOME DWNERS ASSOC.	22060 S A 520	Wir Gen 1*	W/te General	Water General	hrigation
01-00000211-00-9	THE VILLAS OF WEDGEFIELD HOA INC	PORCE MAXIME PICKY BRIEG	Wir Gen 2"	We king - Residen	Water General	trigation
01-00000161-00-3	LEE, LOUISA	20831 NETYLETON ST	Wir Gen 5/8"	Wa king - Residen	Weids General	higaton
@1-00000P31-06-5	VALAS AT WEDGEFELD	2625-2827 ALBION AVE	Wir Gen 5/8"	We king - SteelGen	Water General	linigation .
91-00005540-99-3	VELAS AT WEDGEFELD	VIC 2640 ALBION	Wir Gen 5'8"	Wite Coneral	Weler Coneral	Irigaton
91-00805550-00-8	VILLAS AT WEDGEFIELD	VIC 2626 ALBION	Wir Gen 5'8"	Wit General	Water General	Irigation
01-00005560-00-9	VILLAS AT WEDGEFELD	VIC 2013 ALBION	We Gen 54"	Wit General	Water General	ingation
01-00005970-00-2	VILLAS AT WEDGEFIELD	VIC 2505 ALBION	Wo Gen 5-5"	Wir General	Water Coneral	frigation
01-00005586-00-5	VILLAS AT WEDGEFIELD	VIC 2650 ALBION	We Gen 5.5"	Ww Cleheral	Water General	hrigation
01-00005590-00-8	VALAS AT WEDGEFIELD	VIC 2635 ALBION	Wir Gen 5-8"	Wis Garporal	Water General	Prigation
01-00005500-00-8	VILLAS AT WEDGEFIELD	VIC 2506 ALBION	War Gen 5'8"	Wit Coneral	Water General	ingation
91-90905619-00-1	VILLAS AT WEDGEFIELD	VIC 2512 ALBION	War Gen 5/8*	We General	Water Corneral	krigation
01-00005820-00-4	VILLAS AT WEDGEFIELD	VIC 2564 ALBION	Wir Gon 5/6"	We General	Water General	krigation
01-00005630-00-7	VALAS AT WEDGEFIELD	VIC 2546 ALBION	Ww Gen 5/8"	Wir General	Water General	irrgation
01-00005640-00-0	VILLAS AT WEDGEFIELD	VIC 2552 ALBION	We Gen 5 B	Wir General	Water General	Irrigation
01-00005650-00-3	VALAS AT WEDGEFIELD	VIC 2553 ALBION	WV Gen 5/8"	. Wu General	Water General	higation
91-00006369-00-0	VALAS AT WEDGEFIELD	2543 ALBION AVE	Wir Gen S'e	Ww.General	Water General	iri galion
01-00006120-00-6	CARPENTER, NOLA	20212 MAXIM PKWY	Wit Gon Sit	We kray - ResiGen	Water General	krigation
01-00016390-00-6	STARR R DONALD D	2538 ALABASTER AVE IRRG	We Gen 5'8'	We ling Res/Gen	Wales General	trigation
Detail Account	Detail Full Billing Name	Detail Full Property Address	Detail Rote Name	Detail Service Name	Classification per MFR	Updated Classification
01-00006260-00-7	INFINITY OF ORLANDO LLC	20733 MACON PKWY	Wir Gen 1"	With Commercial	Water General	Water Coneral
01-00009030-00-3	CAPSTONE GOLF LLC	MAINTENANCE	Wir Gen 1"	Wit General	Water General	Water Clemeral
01-00000031-00-1		TEMP HYD MTR NUGENT & BANCROFT	Web Gen 2"	Wit Gorieral	Welor General	Water Clemeral
01-00009620-00-0	CAPSTONE GOLF LLC	CLUBHOUSE	Wir Gan 2"	Will General	Water General	Water Coneral
01-00000021-00-8	4	TEMP MTR NETTLETON ST 10	With Gon 3"	Witt General	Water General	Water General
01-00020820-00-5		TEMP HYD LITR SR520 & MAXIM PKWY	Wu Gen 3"	Wir Goneral	Water General	Water General
01-00009340-00-5	RANGER DRAMAGE	19950 NUGENT ST	Wil Gon S.B"	Wit General	Water Gerneral	Water General
01-00009670-00-7	CAPSTONE GOLF LLC	20056 NETTLETON ST RESTROOM	Will Gen 3/8"	Wir General	Water General	Water General
Q1-00009710-00-4	ORANGE COUNTY PARKS & REC DIV	20425 MANSFELD AVE	Wir Gen & B"	Wit Gomeral	Water General	Water General
01-00017410-00-8	RESERVES AT WEDGEFELD HOA	3016 LEFLORE LN	Wir Gen 3/8"	Wir General	Water General	Water General
Detail Account	Detail Full Billing Name	Detail Full Property Address	Detail Rate Name	Betail Service Name	Classification per MFR	Updated Classification
01-00006260-00-7	REPRITY OF ORLANDO LLC	20735 MACON PKWY	Wir Gon 1"	Wir General	Washwater General	Wastenster General
01-00009830-00-3	CAPSTONE GOLF LLG	MAINTENANCE	Wir Gen 1*	Wir General	Wastewater General	Wastewater General
01-00009820-00-0	CAPSTONE GOLF LLC	CLUBHOUSE	Wir Gen 2'	Wir General	Wastewater Coneral	Wasterster General
01-00009340-00-5	RANGER DRAMAGE	19050 NUMBENT ST	Wa Gon Sill'	Wu General	Wastewater General	Wastereples General
01-00009810-00-7	CAPSTONE GOLF LLC	20855 NETTLETON ST RESTROOM	Wir Gen 5/8"	Wir General	Wasterwater General	Wastermiter General
01-00009710-00-4	ORANGE COUNTY PARKS 4 REC DIV	20425 MANSFELD AVE	Wu Gen 5'8"	We General	Wastewater General	Wasterwater General
61-00017410-00-8	AESERVES AT WEDGEFIELD HOA	3018 LEFLORE LIE	Wu Gen 5/8*	Wir General	Wastewater General	Wastericaler Conoral

^{*} Temporary meters - only in use when necded

Pluris Wedgefield; Inc. TIME AND BILLING SCHEDULE - FPSC MINIMUM FILING REQUIREMENTS: August 8; 2012.

		Employée Name				
Description:	Date	Ray Alace		James Wessman		Total .
Respond to client questions regarding MFRs	06/08/12		1.00			1.00
Respond to client questions regarding MFRs	06/12/12		1.00		, i	1.00
Client file setup	06/15/12				1.00	1.00
Review formulas in MFR template	06/18/12		5.50			5.50
Review formulas in MFR template	06/18/12	1.25				1.25
Review formulas in MFR template	06/18/12			1.50		1.50
Review formulas in MFR template	06/19/12		6.00			6.00
Review formulas & prior PSC Orders	06/20/12		5.50			5.50
Review rules of preparing interim rates	06/21/12		1.50			1.50
Review all schedules of MFRs Version 3	06/22/12		1.25			1.25
Review all schedules of MFRs Version 3	06/25/12		7.50			7.50
Review all schedules of MFRs Version 3	06/26/12		8.50			8.50
Review all schedules of MFRs Version 3	06/27/12		7.50			7.50
Setup rate calculation schedules & misc adjustments to sec. A	06/28/12		7.50			7.50
Review schedules B-5, B-6, B-7, B-8	06/29/12		7.25			7.25
Enter proforma adjustments and adjust any effected schedules	07/02/12		7.50			7.50
Update sections A,B,C, E after proforma adjustments	07/03/12		7.50			7,50
Adjustments to schedules B-5, B-6	07/09/12		7.00			7.00
Address attorneys comments on MFRs	07/10/12		7.00			7.00
Adjustments to schedules B-7, B-8, B-9, C-5, C-6, C-8	07/11/12		5.00			5.00
Review and adjust section G	07/12/12		6.00			6.00
Review and adjust section G	07/13/12		6.50			6.50
Review and adjust section G	07/16/12		4.00			4.00
Review and adjust section G	07/17/12		4.00	,		4.00
Sub-total		1.25	114.50	1.50	1.00	118.25
Hourly rate		157.50	94.50	157.50	56.00	
Gross Billings		196.88	10,820.32	236.25	56.00	11,309.45
Total amount due						11,309,45

Primoris Services Corporation



INVOICE #PWFTT1 DATE: 9/10/2012

TO: Pluris Holdings, LLC. 2100 McKinney Ave Suite 1550 Dallas, Texas 75201

FOR:

Pluris Wedgefield Rate Case Preparation & Response

DESCRIPTION	AMOUNT
Tom Tekulve – Pluris Rate Case	
	\$4,750.00
38 Hours @ \$125/hour — Services between January 1, 2012 — September 4, 2012	
3 Hours — Internal Pluris rate case meetings (January 19, 2012 – 3 hours)	-
22 Hours — Financial data review (March 12 – 4 hours; March 13 – 6 hours; March 14 – 4 hours; March 15 – 5 hours; March 16 – 3 hours)	
13 Hours — Rate Case audit review (August 7 – 3 hours; August 8 – 6 hours; August 14 – 4 hours)	
TOTAL	\$4,750.00