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COMMISSION
CLERK

January 18, 2013

REDACTED

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

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

For DN 00458-13, which
is in locked storage. You must be
authorized to view this DN.-CLK

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") Summary of Pro Forma Plant and
Expenses requested in this proceeding and the Request for Confidential Classification.

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)
Ana VanEsselstine (via e-mail)
Bart Fletcher (via e-mail)
Steve Reilly, Esquire
Michael Lawson

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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 Summary of Pro Forma Plant and Expenses filed with the Clerk electronically on January 18, 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 Pro Forma plant and Expenses 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 name and title, base salary, benefits, taxes, pension information and total compensation. This information should be classified as proprietary confidential business information because its disclosure would impair the Utility's

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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 18th day of
January, 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@sfflaw.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 by hand-delivery and furnished by U.S. Mail to the following parties this 18th day of January, 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>SUMMARY (All of amounts in the column titled Expenses Amount under the description "Cost of new controller" and "Addition of two call center employees")</p> <p>EMPLOYEE COSTS (All of the amounts Salary, Payroll tax expense, employee benefits and Total columns for each listed employee in the chart, and the salary and benefits amounts in the dialogue)</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>

REDACTED

Pluris Wedgefield, Inc.

Additional Proforma Costs - both Expenses and Capital

Description	Expenses Amount	Capital Amount
Cost of new controller	\$ 28,689	
Addition of two call center employees	\$ 14,005	
Increase in property taxes (above filed amount of \$108,593)	\$ 67,375	
Water plant bio-filter		\$ 20,100 *
Pipe break costs		\$ 87,731
VFD and Scada at Water Plant		\$ 50,893 **
Wier Replacement at Wastewater Plant		\$ 12,412 **
Total Proforma Costs	\$ 110,069	\$ 171,136

* See tab for hard quote of \$15,100. Pluris expects an additional \$5,000 in concrete foundation, piping and fabric on water tank.

** Proforma adjustments previously included on Schedule A-3 of MFRs



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➤ Customer Care Center Staff. Beverly Yopp, Director of Customer Care along with 4 call center staff comprised the total number of call center personnel in the 2011 test year. The total present (post-test year period) call center staff's annual salaries and benefits are provided in the following table

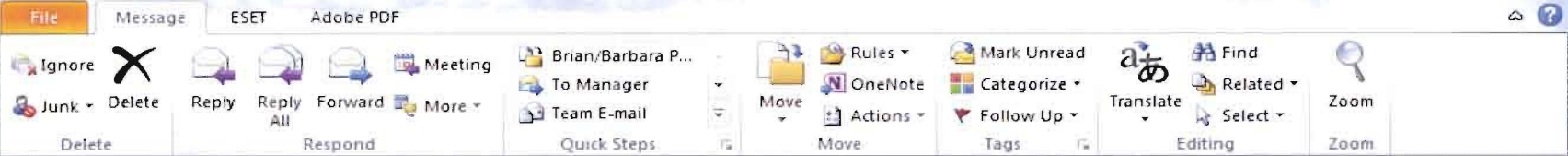
Employee	Salary	Payroll Tax Expense	Employee Benefits	Total
Brook Duff	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Erica Gandy	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Kristy Hairston	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Amelia Moore	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Beverly Yopp	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Valerie Thomas	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Joyce Scott	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Please note that as a result of comments made during the customer meeting in Wedgefield regarding hold times; along with management's review in the other utilities, two additional Pluris call center staff will be added to the call center (effective date is 12/31/12) in order to address holds during call in by customers. One of the two call center employees hired (Joyce Scott) was hired to also address an increasing bi-lingual need in the Florida utilities. Both Ms. Thomas and Ms. Scott have accepted the positions.

➤ Name of new employees that have been hired after December 31, 2011, and their annualized salary or wages. Mr. Dan Winters, Controller for Pluris Holdings, LLC was hired on July 2, 2012 and his annualized salary with benefits are [REDACTED]. His allocated costs to Pluris Wedgefield, Inc. is $0.3021 \times [REDACTED] = [REDACTED]$. Also see the aforementioned table for the costs related to the two new call center staff – Valerie Thomas and Joyce Scott who will start December 31, 2012.

New controller amount should be $[REDACTED] \times 0.2001 = [REDACTED]$
 Two call center employees should be $[REDACTED] + [REDACTED] \times 0.2001 = \$ [REDACTED]$

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From: Martin Friedman <MFriedman@sfflaw.com> Sent: Thu 11/8/2012 12:59 PM
To: Ana VanEsselstine
Cc: Bart Fletcher; Maurice Gallarda; Dan Winters
Subject: Pluris Wedgefield Rate Case/Docket No. 120152-WS

Message Wedgefield Property Tax Bills 2012.pdf (807 KB)

Ana,

During the test year the Utility had property taxes of \$108,593. The 2012 property tax bills (copies attached) which the Utility just received, totals \$175,968, an increase of \$67,375. When the Utility inquired as to why there was such a large increase it was told that there was an error and actually the prior year's bill should have been greater than it was.

Please accept this as Pluris Wedgefield's request for a proforma increase in property taxes. Should you have any questions, or should you disagree that a proforma adjustment is appropriate, please contact me.

Regards, Marty

MARTIN S. FRIEDMAN

**SUNDSTROM.
FRIEDMAN & FUMERO, LLP**
Attorneys | Counselors



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Tallahassee • Lake Mary • Boca Raton



Martin Friedman



proposal1 ECS [Read-Only] - Microsoft Word


File Home Insert Page Layout References Mailings Review View Acrobat

Calibri (Body) 11 A A Aa B U X x Font Paragraph Styles

ECS
Powered by CalgonCarbon

Proposal 120515C

Project Name:	Date: 12/14/2012
Local Representative:	Location:
Specification Section:	Equipment: Odor Control System



Odor Control System - Carbon
<p>Scope :</p> <ul style="list-style-type: none"> • One (1) ECS V1-TM-200 adsorber systems: <ul style="list-style-type: none"> ○ Rated for 200 cfm ○ 30" diameter FRP vessel with top mounted fan ○ Plain end inlet with fernco flexible connector ○ Three (3) 2" carbon sample ports with PVC ball valves per media bed ○ One (1) 2" drain/fill port with PVC ball valve ○ One (1) 2" overflow port with PVC ball ○ Three (3) ½" air sample ports with PVC ball valve and Magnehelic gauge ○ 316 SST grounding rod in media bed ○ 15 ft³ of activated carbon media ○ Simple control panel with disconnect, on/off switch and run light
<p>Price for the above equipment, including freight to the jobsite, is \$ 15,100.00</p> <ul style="list-style-type: none"> • Price includes special water-regeneable carbon which provide long carbon life.

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Vendor	Invoice #	Amount Due
Rangeline	FL-26507-1	\$ 13,100.00
		Sub Total \$ 13,100.00
Central Florida Tapping	9 5098	\$ 4,185.00
		Sub Total \$ 4,185.00
S&K Utilities and Construction	2012-3	\$ 6,737.50
S&K Utilities and Construction	2012-4	\$ 2,800.00
S&K Utilities and Construction	2012-5	\$ 1,950.00
S&K Utilities and Construction	2012-7	\$ 1,250.00
S&K Utilities and Construction	2012-15	\$ 7,071.23
		Sub Total \$ 19,808.73
TNT Sewer	12-326	\$ 9,750.00
		Sub Total \$ 9,750.00
Duda and Son	57930000	\$ 310.92
		Sub Total \$ 310.92
EMS of Central Florida	22281	\$ 1,400.00
EMS of Central Florida	22542	\$ 950.00
EMS of Central Florida	22543	\$ 500.00
EMS of Central Florida	21918	\$ 6,265.00
EMS of Central Florida	21903	\$ 2,075.00
EMS of Central Florida	22130	\$ 7,385.00
EMS of Central Florida	21716	\$ 650.00
EMS of Central Florida	21628	\$ 11,440.00
EMS of Central Florida	21291	\$ 1,049.86
EMS of Central Florida	22368	\$ 1,400.00
EMS of Central Florida	22550	\$ 2,664.45
EMS of Central Florida	22549	\$ 4,800.00
		Sub Total \$ 40,579.31
Total Amount		\$ 87,733.96