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MARSHALL WILLIS, DIRECTOR
DIVISION OF ACCOUNTING AND FINANCE
(850) 413-6900

Public Service Commission

February 6, 2013

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CLERK

13 FEB - 7 AM 10: 08

RECEIVED-FPSC

SEVENTH DATA REQUEST

Mr. Martin S. Friedman
Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, Florida 32746

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

Dear Mr. Friedman:

Staff needs the following information to complete our review of the application filed by Pluris Wedgefield, Inc. (Pluris or Utility).

1. Does the Utility's umbrella policy include coverage for Director's and Officer's Liability? If so, what is the amount?
2. In response to question no. 8 of staff's fifth data request, the Utility indicated that it was currently waiting for support to be provided by Utilities, Inc. regarding the organization costs for wastewater. Please provide staff an update of when the Utility expects this information. If available, please provide the support as requested.
3. The Utility's summary of requested pro forma adjustments and expenses included a statement that Beverly Yopp and four other call center staff were the total number of call center personnel in the test year.
 - a. Please clarify where in the contract between Utility Partners and Pluris Holdings, LLC is the agreement for providing customer care through a call center.
 - b. Did the Utility receive pro forma adjustments for call center employees in its other cases in Florida and North Carolina for any of its sister companies?
 - c. Has the Utility ever preformed an employee compensation study for any of its positions under Pluris Holdings, LLC.
4. In the Utility's response dated September 28, 2012, Utility stated that the \$299 recorded as Miscellaneous Fees was for meter tampering. Please provide support documentation for the historical average cost for this type of event.

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5. Schedule E-2, shows that residential irrigation customers were billed at \$5.02 per 1,000 gallons. According to Order No. PSC-09-0610-FOF-WS, which approved the transfer, residential irrigation should be billed an inclining block rate structure for consumption. Is the Utility correctly billing its residential irrigation customers? Please provide bills that show the rate(s) being charged and redact the customer information.
6. Schedule E-3 includes \$30,944 for total "Late Fees." At the customer meeting held in December, several customers mentioned that a mishap with the post office caused them to incur late penalties. As a result of a subsequent conversation, staff recalls the mention of customer refunds of those late fees. Were any of the \$30,944 total "Late Fees" incurred as a result of incorrect billing? If so, please provide an amount for all refunded amounts that arose out of incorrect billing.
7. In previous Utility e-mail response dated December 28, 2012, Utility stated that late fees of \$19,498.50 have been collected through December 13, 2012. Please provide the actual amount of late fees collected for 2012?
8. In your response to question no. 6 of additional questions from The Office of Public Counsel, the Utility stated that its travel policy requires its employees to rent not more than a mid-size vehicle on trips and that this typically includes vehicles such as a Chevrolet Impala, Ford Focus or Nissan Altima.
 - a. Is there any specific reason why Mr. Gallarda and Mr. Pratt require a vehicle larger than the mid-size vehicles mentioned above? If so, please provide a detailed explanation.
 - b. Please provide an estimated annual lease expense amount for the same year as the Utility's Land Rovers for each of the aforementioned mid-sized vehicles and a Ford Expedition.
9. In staff's 5th data request, question no. 11 asked how the Utility plans to allocate the costs of plant improvements for its Center Star well and three miles of PVC water main. The Utility's response was that East Lauderdale Water and Fire Protection Authority (ELCW&FP) pays all costs relating to the operations of the water well including all labor, chemicals, electricity and other costs. In addition, the Utility stated that the ELCW&FPA is responsible for any changes as the water from the well meets all Alabama Department of Environmental Management requirements for drinking water. However, the question was not answered for the three miles of PVC water main. Please provide this same information for the three miles of PVC water main that is part of the Alabama, LLC.
10. Please provide an updated rate case expense amount.

Mr. Martin S. Friedman
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Please submit the above information to the Office of Commission Clerk no later than February 20, 2013. If you have any questions, please contact me by phone at (850) 413-6435 or by e-mail at avanesse@psc.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads "Ana VanEsselstine". The signature is written in black ink and is positioned above the printed name.

Ana VanEsselstine
Regulatory Analyst II

cc: Division of Accounting and Finance (Fletcher, Maurey)
Division of Auditing and Performance Analysis (Deamer, Hill-Slaughter)
Division of Economics (Hudson, Daniel, Thompson)
Division of Engineering (Ballinger, McRoy)
Office of the General Counsel (Lawson, Crawford)
Office of Commission Clerk (Docket No. 120152-WS)