

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

RECEIVED-FPSC  
13 APR - 2 AM 11:58  
COMMISSION  
CLERK

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**DATE:** April 2, 2013  
**TO:** Ann Cole, Commission Clerk, Office of Commission Clerk  
**FROM:** Ana VanEsselstine, Regulatory Analyst II, Division of Accounting & Finance  
**RE:** Application for increase in water and wastewater rates in Orange County by Pluris Wedgefield, Inc. - Docket No. 120152-WS

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Please place the attached e-mail correspondence in the above referenced docket file.

DOCUMENT NUMBER-DATE

01608 APR-2 2013

FPSC-COMMISSION CLERK

## Ana VanEsselstine

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**From:** Ana VanEsselstine  
**Sent:** Tuesday, April 02, 2013 9:19 AM  
**To:** Martin Friedman <MFriedman@sfflaw.com> (MFriedman@sfflaw.com)  
**Cc:** Bart Fletcher; Andrew Maurey; Cheryl Bulecza-Banks; Michael Lawson  
**Subject:** FW: Dkt 120152 Wedgefield Staff Workpapers  
**Attachments:** Final.XLS; Interim Refund Final.xls; Pluris Water Rates Calculator (3-28-13).xls; Pluris Wedgefield 4 Year Rate Reduction Calculation.xls; Pluris Wedgefield Wastewater Rates Calculations (3-28-13).xls; Travel.xlsx

Good morning,

Attached are staff's work papers.

Mrs. Ana VanEsselstine  
Regulatory Analyst II  
Division of Accounting and Finance

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Phone: (850) 413-6435  
Fax: (850) 413-6436

*Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.*

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**From:** Ana VanEsselstine  
**Sent:** Tuesday, April 02, 2013 8:36 AM  
**To:** 'Merchant, Tricia'  
**Cc:** Cheryl Bulecza-Banks; Andrew Maurey; Bart Fletcher  
**Subject:** RE: Dkt 120152 Wedgefield Staff Workpapers

Good morning,

Please see attached.

Mrs. Ana VanEsselstine  
Regulatory Analyst II  
Division of Accounting and Finance

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2540 Shumard Oak Boulevard  
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---

**From:** Merchant, Tricia [<mailto:MERCHANT.TRICIA@leg.state.fl.us>]

**Sent:** Monday, April 01, 2013 11:53 AM

**To:** Ana VanEsselstine; Bart Fletcher

**Subject:** RE: Dkt 120152 Wedgefield Staff Workpapers

For clarification, this request includes the accounting and rate schedules and all supporting spreadsheet files. Thanks much.

Tricia

---

**From:** Merchant, Tricia

**Sent:** Monday, April 01, 2013 11:37 AM

**To:** Ana VanEsselstine ([AVanesse@psc.state.fl.us](mailto:AVanesse@psc.state.fl.us)); Bart Fletcher

**Subject:** Dkt 120152 Wedgefield Staff Workpapers

Good morning Ana,

I would like to get a copy of all of staff's Excel workpapers associated with staff's recommendation on Wedgefield. If you could email them this afternoon, that would be great. Thanks so much!

Tricia Merchant  
Office of Public Counsel  
111 West Madison Street  
Pepper Building, Room 812  
Tallahassee, Florida 32399-1400  
Phone: 850-717-0332  
Email: [merchant.tricia@leg.state.fl.us](mailto:merchant.tricia@leg.state.fl.us)

## Ana VanEsselstine

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**From:** Ana VanEsselstine  
**Sent:** Tuesday, April 02, 2013 9:17 AM  
**To:** Maurice Gallarda <mgallarda@plurisusa.com> (mgallarda@plurisusa.com)  
**Cc:** Martin Friedman <MFriedman@sfflaw.com> (MFriedman@sfflaw.com); Bart Fletcher; Andrew Maurey; Cheryl Bulecza-Banks; Michael Lawson; Merchant, Tricia (MERCHANT.TRICIA@leg.state.fl.us); 'reilly.steve@leg.state.fl.us'  
**Subject:** FW: {BULK} FW: Pluris Wedgefield Rate Case  
**Attachments:** AWWA Compensation Survey.pdf  
**Importance:** Low

Good morning,

We used the max average salary range for the population size of 10-25,000 for all of the positions.

Mrs. Ana VanEsselstine  
Regulatory Analyst II  
Division of Accounting and Finance

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**From:** Maurice Gallarda [mailto:mgallarda@plurisusa.com]  
**Sent:** Monday, April 01, 2013 6:32 PM  
**To:** Ana VanEsselstine; Bart Fletcher  
**Cc:** 'Martin Friedman (MFriedman@sfflaw.com)'  
**Subject:** {BULK} FW: Pluris Wedgefield Rate Case  
**Importance:** Low

Hi Ana,

I had not copied Bart this morning on my email request so just in case you were out the balance of the day I thought I would include him here. Time is a bit of the essence in our review. Can you email me the 2008 sheets with a circle around the values you chose for each of the Top Executive, the Top Finance Executive, the Top Administrative Executive and the Office/Administrative Services Manager?

Best regards,  
Maurice

**Maurice W. Gallarda, PE**

Managing Member and Principal Engineer



**Pluris Holdings LLC**

T 214.220.3412 / F 214.965.9090

2100 McKinney Avenue, Suite 1550, Dallas, TX 75201

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**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Monday, April 01, 2013 4:31 PM  
**To:** Maurice Gallarda  
**Subject:** RE: Pluris Wedgefield Rate Case

Maurice,  
Have you heard back from Ana on this?

**MARTIN S. FRIEDMAN**

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



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**From:** Maurice Gallarda [<mailto:mgallarda@plurisusa.com>]  
**Sent:** Monday, April 01, 2013 11:02 AM  
**To:** Ana VanEsselstine  
**Subject:** RE: Pluris Wedgefield Rate Case

Hi Ana,  
Can you identify which AWWA Salary that was chosen within the 2008 tables you sent?  
Thanks,

Maurice

**Maurice W. Gallarda, PE**  
Managing Member and Principal Engineer



**Pluris Holdings LLC**

T 214.220.3412 / F 214.965.9090

2100 McKinney Avenue, Suite 1550, Dallas, TX 75201

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**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Monday, April 01, 2013 9:44 AM  
**To:** Martin Friedman; Bart Fletcher  
**Cc:** Maurice Gallarda; Andrew Maurey; Cheryl Bulecza-Banks  
**Subject:** RE: Pluris Wedgefield Rate Case

Please see attached.

Thanks and have a great day!

Mrs. Ana VanEsselstine  
Regulatory Analyst II  
Division of Accounting and Finance

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Phone: (850) 413-6435  
Fax: (850) 413-6436

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---

**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Friday, March 29, 2013 3:53 PM  
**To:** Bart Fletcher; Ana VanEsselstine

**Cc:** Maurice Gallarda  
**Subject:** Pluris Wedgefield Rate Case

Bart & Ana,

I left Bart a voice message but though I would follow-up with an email. Since three other jurisdictions have approved the officer salaries I am trying to figure out the basis for Staff's proposed adjustment. Can you email me the pages from the AWWA Compensation Survey which you relied upon?

Thanks, Marty

**MARTIN S. FRIEDMAN**

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



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# AWWA

# 2008

## Water Utility Compensation Survey



**American Water Works  
Association**

The Authoritative Resource on Safe Water<sup>®</sup>

*Advocacy  
Communications  
Conferences  
Education and Training  
Science and Technology  
Sections*



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## JOB DESCRIPTIONS

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- |  |  |
|--|--|
| <p><b>1 Top Executive</b><br/>Under general direction of the city, managing Board of Directors, mayor, or Board of Water Commissioners, is responsible for managing, planning, coordinating and administering all activities of the Water Department and/or water company. Responsible for the short and long range strategy of the organization subject to review by the Board.</p> <p><b>2 Top Planning Executive</b><br/>Responsible for functions relating to raw water development planning, protection and operation; hydraulic system planning; demographics, land use and plan review; and capital program development, both long and short range.</p> <p><b>3 Top Operations &amp; Maintenance Executive</b><br/>Directs and administers the Operations/Maintenance Division functions of Source and Supply, Water Treatment, Water Quality, Water Control, Transmission and Distribution, Maintenance and Process Control.</p> <p><b>4 Top Engineering Executive</b><br/>Responsible for administering all engineering/construction programs, including special projects and the design and construction of Departmental facilities.</p> | <p><b>5 Top Internal Audit Executive</b><br/>Responsible for the internal audit function, including the analysis and auditing of divisional and sectional operations.</p> <p><b>6 Top Public Affairs Executive</b><br/>Responsible for the public affairs function, which includes the areas of: media relations; conservation; intergovernmental relations; environmental coordination, and community affairs. Reviews, analyzes and recommends Board policy.</p> <p><b>7 Top Finance Executive</b><br/>Responsible for management of the Department's financial resources, including acting as the dispersing authority for the Top Executive. Directs and manages the Accounting, Treasury and Budget Operations, Rate Administration, Contract and Information Services Sections.</p> <p><b>8 Top Administration Executive</b><br/>Under general direction of the Top Executive, is responsible for all administrative functions, including Human Resources, the Affirmative Action Program, Customer Services, General Services, Administrative Services and Property Administration.</p> |
|--|--|

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## JOB DESCRIPTIONS

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- 18 General Services Manager**  
Responsible for planning, managing, coordinating and administering the General Services functions of records and control, warehousing and purchasing.
- 19 Environmental Manager**  
Plans, supervises, directs, and evaluates the effectiveness of environmental programs. Analyzes data to develop recommendations for compliance with environmental legislation, and to minimize negative impact of Departmental operations on the environment. Reviews environmental research representing the Department to governmental, public and environmental groups.
- 20 Office/Administrative Services Manager**  
Responsible for direction of the functions of graphics and reproduction, records and facility mapping, mail and messenger services, switchboard and other general office functions.
- 21 Customer Service Manager**  
Responsible for the customer services, water sales and collections functions, ensuring the maintenance of customer relations at an effective level, while handling customer inquiries and problems related to billing, meter reading, service contracts, revenue collection and inspections.
- 22 Accounting Manager/Controller**  
Responsible for planning, organizing, directing and participating in all accounting functions.
- 23 Community Affairs Manager**  
Plans, develops and administers a comprehensive public information program, including a variety of programs for the community, public and Departmental work force.
- 24 Associate Engineer**  
Under direct supervision, performs a variety of routine professional level engineering work involving both office and field activities. Typically has a Bachelor's Degree in Engineering and 0-2 years of experience.
- 25 Engineer**  
Under supervision, performs a variety of complex and advanced professional level engineering work involving both office and field activities. Typically has a Bachelor's Degree in Engineering and 2-4 years of experience.
- 26 Senior Engineer**  
Under general supervision, performs a variety of complex advanced professional level engineering work involving both office and field activities. Supervises functional engineering activities, or manages engineering projects.

# Water Utility Compensation Survey - 2008

All Participants

## Job 01 - Top Executive

Under general direction of the city, managing Board of Directors, mayor, or Board of Water Commissioners is responsible for managing, planning, coordinating and administering all activities of the Water Department and/or water company. Responsible for the short and long range strategy of the organization subject to review by the Board.

Summary of All Reported Data by Ownership/Management Type

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Board Operated	382	375	83	\$99,576	\$114,608	\$114,608	\$91,209	\$112,012	\$130,661
City/County	277	262	128	\$96,159	\$100,190	\$100,190	\$79,121	\$97,356	\$114,773
Private	18	18	31	\$92,500	\$133,005	\$133,005	-	-	-
Other	23	23	64	\$110,000	\$123,692	\$123,692	\$124,475	\$156,576	\$180,957
All	700	678	99	\$98,440	\$109,833	\$109,833	\$85,260	\$104,806	\$123,161

Summary of All Reported Data by Population Size

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 250,000	71	68	551	\$168,360	\$193,721	\$193,721	\$125,349	\$156,939	\$189,492
100 - 250,000	75	70	202	\$128,890	\$134,550	\$134,550	\$97,584	\$122,282	\$141,142
50 - 100,000	116	110	85	\$110,343	\$123,048	\$123,048	\$87,525	\$103,848	\$126,095
25 - 50,000	98	93	53	\$96,811	\$103,735	\$103,735	\$80,711	\$98,904	\$115,437
10 - 25,000	178	176	32	\$90,420	\$95,473	\$95,473	\$75,846	\$92,836	\$107,489
< 10,000	162	161	13	\$70,532	\$73,847	\$73,847	\$57,036	\$67,993	\$79,509

Summary of All Reported Data by Average Gallons Managed

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 250	18	17	838	\$167,643	\$221,599	\$221,599	\$143,842	-	\$216,507
100 - 250 Mil	25	23	624	\$169,076	\$195,745	\$195,745	\$109,959	\$140,262	\$175,910
50 - 100 Mil	40	39	282	\$158,017	\$163,181	\$163,181	\$118,142	\$138,266	\$170,792
25 - 50 Mil	67	62	198	\$133,604	\$137,893	\$137,893	\$97,059	\$121,545	\$142,361
10 - 25 Mil	107	104	86	\$116,332	\$124,279	\$124,279	\$90,512	\$108,015	\$132,006
< 10 Mil	443	433	31	\$85,000	\$88,589	\$88,589	\$72,050	\$87,540	\$101,690

Summary of All Reported Data by Total Employment

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 500	36	33	911	\$179,988	\$208,015	\$208,015	\$127,755	\$158,896	\$198,148
200 - 500	64	61	321	\$140,500	\$157,397	\$157,397	\$110,883	\$138,855	\$183,569
100 - 200	80	78	141	\$130,316	\$137,603	\$137,603	\$95,530	\$113,857	\$137,084
50 - 100	114	107	71	\$116,832	\$121,108	\$121,108	\$89,390	\$110,452	\$131,400
25 - 50	132	128	35	\$93,945	\$98,442	\$98,442	\$77,166	\$94,460	\$109,505
< 25	274	271	11	\$78,385	\$80,106	\$80,106	\$64,953	\$77,922	\$90,746

# Water Utility Compensation Survey - 2008

All Participants

## Job 07 - Top Finance Executive

Responsible for management of the Department's financial resources, including acting as the dispersing authority for the Top Executive. Directs and manages the Accounting, Treasury and Budget Operations, Rate Administration, Contract and Information Services Sections.

Summary of All Reported Data by Ownership/Management Type

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Board Operated	202	192	16	\$90,447	\$97,952	\$97,952	\$79,336	\$97,442	\$113,224
City/County	122	115	17	\$82,764	\$84,990	\$84,990	\$67,713	\$84,831	\$98,650
Private	5	5	2	\$116,000	\$153,342	\$153,342	.	.	.
Other	9	9	7	\$102,492	\$117,722	\$117,722	\$88,752	\$107,470	\$120,316
All	338	321	16	\$88,797	\$94,725	\$94,725	\$74,922	\$92,875	\$107,561

Summary of All Reported Data by Population Size

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 250,000	62	60	31	\$121,097	\$127,307	\$127,307	\$90,304	\$113,868	\$135,482
100 - 250,000	57	53	23	\$89,112	\$97,406	\$97,406	\$75,108	\$91,358	\$108,410
50 - 100,000	62	58	13	\$93,161	\$98,770	\$98,770	\$77,107	\$92,505	\$109,435
25 - 50,000	47	44	8	\$89,309	\$88,755	\$88,755	\$73,733	\$89,862	\$104,446
10 - 25,000	72	69	8	\$79,045	\$81,540	\$81,540	\$66,851	\$81,862	\$92,903
< 10,000	36	37	4	\$63,746	\$63,398	\$63,398	\$53,244	\$63,952	\$74,117

Summary of All Reported Data by Average Gallons Managed

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 250	16	15	31	\$126,400	\$147,805	\$147,805	\$100,285	\$128,310	\$147,618
100 - 250 Mil	21	20	42	\$123,427	\$129,417	\$129,417	\$88,324	\$113,516	\$139,428
50 - 100 Mil	33	32	30	\$112,518	\$118,594	\$118,594	\$91,359	\$108,136	\$130,413
25 - 50 Mil	49	47	22	\$94,265	\$101,987	\$101,987	\$77,728	\$93,568	\$113,065
10 - 25 Mil	59	54	10	\$89,226	\$91,814	\$91,814	\$73,472	\$92,492	\$104,089
< 10 Mil	160	153	8	\$76,386	\$78,791	\$78,791	\$66,135	\$80,286	\$93,027

Summary of All Reported Data by Total Employment

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 500	32	30	53	\$124,767	\$138,090	\$138,090	\$94,231	\$120,628	\$143,372
200 - 500	54	51	28	\$106,300	\$112,253	\$112,253	\$84,182	\$106,729	\$124,144
100 - 200	60	59	9	\$95,800	\$101,195	\$101,195	\$76,737	\$92,235	\$108,560
50 - 100	71	66	10	\$88,505	\$89,050	\$89,050	\$71,810	\$89,070	\$103,028
25 - 50	58	54	7	\$78,150	\$82,131	\$82,131	\$68,415	\$79,580	\$94,678
< 25	63	61	4	\$67,530	\$69,774	\$69,774	\$59,162	\$71,502	\$81,573

# Water Utility Compensation Survey - 2008

All Participants

## Job 08 - Top Administration Executive

Under general direction of the Top Executive, is responsible for all administrative functions, including Human Resources, the Affirmative Action Program, Customer Services, General Services, Administrative Services and Property Administration.

Summary of All Reported Data by Ownership/Management Type

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Board Operated	86	82	24	\$72,698	\$86,080	\$86,080	\$76,368	\$91,194	\$107,413
City/County	64	57	51	\$83,772	\$84,309	\$84,309	\$69,874	\$84,897	\$101,516
Private	4	4	.	.	.	.	.	.	.
Other	5	5	6	\$65,000	\$79,377	\$79,377	.	.	.
All	159	148	33	\$79,401	\$84,609	\$84,609	\$73,384	\$88,498	\$104,528

Summary of All Reported Data by Population Size

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 250,000	31	28	81	\$120,772	\$125,603	\$125,603	\$88,389	\$107,301	\$129,899
100 - 250,000	20	17	44	\$100,942	\$105,578	\$105,578	\$84,951	\$100,584	\$121,314
50 - 100,000	29	27	29	\$84,853	\$91,780	\$91,780	\$74,283	\$87,689	\$104,669
25 - 50,000	20	19	9	\$67,280	\$75,791	\$75,791	\$63,890	\$81,084	\$90,089
10 - 25,000	26	26	9	\$64,942	\$64,636	\$64,636	\$54,936	\$66,454	\$77,625
< 10,000	33	31	4	\$49,187	\$51,993	\$51,993	\$50,397	\$59,344	\$65,261

Summary of All Reported Data by Average Gallons Managed

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 250	11	9	57	\$129,132	\$137,461	\$137,461	\$84,883	\$106,335	\$127,956
100 - 250 Mil	9	8	131	\$118,126	\$119,637	\$119,637	\$86,723	\$106,195	\$129,280
50 - 100 Mil	11	10	25	\$109,433	\$109,206	\$109,206	\$93,446	\$111,727	\$131,220
25 - 50 Mil	20	18	82	\$94,555	\$101,339	\$101,339	\$80,505	\$92,312	\$116,071
10 - 25 Mil	26	25	19	\$97,812	\$99,746	\$99,746	\$80,242	\$96,566	\$110,720
< 10 Mil	82	78	8	\$60,000	\$63,052	\$63,052	\$57,020	\$69,506	\$80,207

Summary of All Reported Data by Total Employment

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 500	15	12	111	\$130,346	\$139,861	\$139,861	\$87,905	\$114,377	\$133,958
200 - 500	27	26	74	\$110,278	\$109,811	\$109,811	\$85,221	\$104,130	\$126,213
100 - 200	22	20	18	\$91,211	\$96,822	\$96,822	\$78,547	\$84,566	\$105,843
50 - 100	28	25	11	\$71,990	\$77,810	\$77,810	\$66,096	\$82,623	\$94,283
25 - 50	23	21	7	\$69,000	\$70,029	\$70,029	\$60,261	\$71,472	\$85,620
< 25	46	44	5	\$52,486	\$59,918	\$59,918	\$58,481	\$70,900	\$76,717

# Water Utility Compensation Survey - 2008

All Participants

## Job 20 - Office/Administrative Services Manager

Responsible for direction of the functions of graphics and reproduction, records and facility mapping, mail and messenger services, switchboard and other general office functions.

### Summary of All Reported Data by Ownership/Management Type

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Board Operated	134	126	4	\$42,050	\$45,918	\$45,918	\$41,661	\$50,994	\$57,909
City/County	98	93	5	\$43,680	\$47,649	\$47,649	\$39,024	\$47,023	\$54,844
Private	7	7	*	\$41,322	\$47,539	\$47,539	*	*	*
Other	6	6	*	\$43,660	\$45,223	\$45,223	*	*	*
All	245	234	4	\$43,000	\$46,637	\$46,637	\$40,520	\$48,995	\$56,523

### Summary of All Reported Data by Population Size

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 250,000	23	23	6	\$67,490	\$66,344	\$66,344	\$52,297	\$61,081	\$72,809
100 - 250,000	23	20	5	\$53,476	\$59,183	\$59,183	\$46,483	\$57,396	\$64,440
50 - 100,000	33	29	4	\$51,506	\$52,016	\$52,016	\$43,173	\$51,968	\$61,528
25 - 50,000	35	35	5	\$40,468	\$42,760	\$42,760	\$35,528	\$44,513	\$60,058
10 - 25,000	58	56	3	\$42,613	\$44,923	\$44,923	\$36,770	\$42,959	\$50,567
< 10,000	73	71	2	\$36,000	\$37,785	\$37,785	\$31,510	\$37,795	\$43,655

### Summary of All Reported Data by Average Gallons Managed

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 250	4	4	*	*	*	*	*	*	*
100 - 250 Mil	6	6	7	\$65,014	\$59,148	\$59,148	*	*	*
50 - 100 Mil	16	16	5	\$52,930	\$57,673	\$57,673	\$49,074	\$56,156	\$65,146
25 - 50 Mil	21	19	4	\$55,801	\$57,087	\$57,087	\$45,213	\$55,111	\$63,905
10 - 25 Mil	34	31	5	\$49,500	\$53,752	\$53,752	\$45,002	\$55,587	\$63,541
< 10 Mil	164	158	3	\$40,302	\$41,773	\$41,773	\$35,192	\$42,159	\$48,936

### Summary of All Reported Data by Total Employment

Type	# of Utilities	# of Employees	Avg. # of Ees Sup	50th Percentile	Co Wtd Avg Pay	Employee Wtd Avg Pay	Average Salary Range		
							Min	Mid	Max
Over 500	7	7	10	\$65,569	\$68,355	\$68,355	\$55,379	\$70,037	\$77,813
200 - 500	18	18	6	\$59,438	\$59,665	\$59,665	\$48,521	\$55,388	\$67,952
100 - 200	20	18	4	\$57,207	\$61,444	\$61,444	\$45,618	\$56,199	\$63,997
50 - 100	36	33	4	\$49,500	\$50,157	\$50,157	\$41,605	\$52,630	\$58,456
25 - 50	41	39	4	\$45,490	\$47,040	\$47,040	\$38,707	\$46,412	\$54,239
< 25	123	119	3	\$38,600	\$40,041	\$40,041	\$33,874	\$38,420	\$46,791

## Ana VanEsselstine

---

**From:** Ana VanEsselstine  
**Sent:** Tuesday, April 02, 2013 8:36 AM  
**To:** 'Merchant, Tricia'  
**Cc:** Cheryl Bulecza-Banks; Andrew Maurey; Bart Fletcher  
**Subject:** RE: Dkt 120152 Wedgefield Staff Workpapers  
**Attachments:** Final.XLS; Interim Refund Final.xls; Pluris Water Rates Calculator (3-28-13).xls; Pluris Wedgefield 4 Year Rate Reduction Calculation.xls; Pluris Wedgefield Wastewater Rates Calculations (3-28-13).xls; Travel.xlsx

Good morning,

Please see attached.

Mrs. Ana VanEsselstine  
Regulatory Analyst II  
Division of Accounting and Finance

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Phone: (850) 413-6435

Fax: (850) 413-6436

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---

**From:** Merchant, Tricia [<mailto:MERCHANT.TRICIA@leg.state.fl.us>]  
**Sent:** Monday, April 01, 2013 11:53 AM  
**To:** Ana VanEsselstine; Bart Fletcher  
**Subject:** RE: Dkt 120152 Wedgefield Staff Workpapers

For clarification, this request includes the accounting and rate schedules and all supporting spreadsheet files.  
Thanks much.

Tricia

---

**From:** Merchant, Tricia  
**Sent:** Monday, April 01, 2013 11:37 AM  
**To:** Ana VanEsselstine ([AVanesse@psc.state.fl.us](mailto:AVanesse@psc.state.fl.us)); Bart Fletcher  
**Subject:** Dkt 120152 Wedgefield Staff Workpapers

Good morning Ana,

I would like to get a copy of all of staff's Excel workpapers associated with staff's recommendation on Wedgefield. If you could email them this afternoon, that would be great. Thanks so much!

Tricia Merchant  
Office of Public Counsel  
111 West Madison Street  
Pepper Building, Room 812  
Tallahassee, Florida 32399-1400  
Phone: 850-717-0332  
Email: [merchant.tricia@leg.state.fl.us](mailto:merchant.tricia@leg.state.fl.us)



## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Friday, March 29, 2013 3:53 PM  
**To:** Bart Fletcher; Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** Pluris Wedgefield Rate Case

Bart & Ana,

I left Bart a voice message but though I would follow-up with an email. Since three other jurisdictions have approved the officer salaries I am trying to figure out the basis for Staff's proposed adjustment. Can you email me the pages from the AWWA Compensation Survey which you relied upon?

Thanks, Marty

**MARTIN S. FRIEDMAN**

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



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[www.sfflaw.com](http://www.sfflaw.com)

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## Ana VanEsselstine

---

**From:** Dan Winters <dwinters@plurisusa.com>  
**Sent:** Monday, March 11, 2013 11:08 AM  
**To:** Bart Fletcher; Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** Pluris Wedgefield Customer Deposit Interest

Bart/Ana –

In reference to our earlier call, Pluris plans to keep the interest rate on customer deposits at 6% as was filed in the MFRs. If you have any questions, please don't hesitate to contact me.

**Dan Winters**  
Controller



**Pluris Holdings LLC**

M 214.220.3413 / F 214.965.9090

O 2100 McKinney Ave, Suite 1550, Dallas, TX 75201

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## Ana VanEsselstine

---

**From:** Dan Winters <dwinters@plurisusa.com>  
**Sent:** Thursday, March 07, 2013 5:46 PM  
**To:** Kelly Thompson  
**Cc:** Ana VanEsselstine; Maurice Gallarda  
**Subject:** Pluris Wedgefield Online Payment Fee

Kelly,

After speaking with you and Ana in regards to the online fee, I completed the following analysis. Based on the current online payments being made with Pluris absorbing the third party fee, the entire amount of \$8,080 (less \$179) collected will be absorbed at the end of December, 2013. This will only be 6 months after the PSC final rate Order is contemplated to be out (June, 2013). After December, Pluris continues to absorb the cost at a benefit to the customer.

This may be an alternative for you to consider.

<b>Pluris Online Payments</b>			
<b>Oct 28, 2010 through Aug 11, 2012</b>			

	<b>2010</b>	<b>2011</b>	<b>2012</b>	
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	<b>\$8,080 Total</b>

<b>Pluris Absorption of Online Payment Fee</b>		
<b>September 2012 through December 2013</b>		

	<b>Sep-Dec</b>		
	<b>2012</b>	<b>2013</b>	
Projected online payments *	2,267	4,834	
Fee collected	\$0	\$0	
Fee remitted to third party	\$2,522	\$5,379	
Fee absorbed by Pluris	-\$2,522	-\$5,379	<b>-\$7,901 Total</b>

\* Projected online payments using the increase in # of payments from 2011 to 2012

**Dan Winters**  
Controller



**Pluris Holdings LLC**

**M 214.220.3413 / F 214.965.9090**

**O 2100 McKinney Ave, Suite 1550, Dallas, TX 75201**

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## Ana VanEsselstine

---

**From:** Dan Winters <dwinters@plurisusa.com>  
**Sent:** Thursday, March 07, 2013 2:50 PM  
**To:** Ana VanEsselstine  
**Subject:** RE: Proforma additions / Online Pmt Fee

Great. Thanks for your help Ana!

**Dan Winters**

Controller



**Pluris Holdings LLC**

**M** 214.220.3413 / **F** 214.965.9090

**O** 2100 McKinney Ave, Suite 1550, Dallas, TX 75201

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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Thursday, March 07, 2013 1:47 PM  
**To:** Dan Winters  
**Cc:** Maurice Gallarda; Bart Fletcher; Kelly Thompson; Shannon Hudson; Cheryl Bulecza-Banks  
**Subject:** RE: Proforma additions / Online Pmt Fee

Hi Mr. Winters,

I wanted to confirm that the Commission has received Wedgefield's pro forma requests. Also, I spoke with Mrs. Thompson regarding the online payment fees. We clarified that the amount retained by Pluris was provided in the response dated November 21, 2012 and have no additional request for information.

Thanks.

Mrs. Ana VanEsselstine  
Regulatory Analyst II  
Division of Accounting and Finance

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Phone: (850) 413-6435  
Fax: (850) 413-6436

*Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.*

---

**From:** Dan Winters [<mailto:dwinters@plurisusa.com>]  
**Sent:** Thursday, March 07, 2013 2:15 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** Proforma additions / Online Pmt Fee

Ana,

I left you another voicemail but thought it best to follow-up in email as well. I just wanted to be sure that Staff has included our proforma increases submitted mid-January as well as the additional call center costs submitted via email on Feb 1. Please respond via email or by calling me at 469.360.8480 at your earliest convenience to confirm that these increased costs have been accepted.

Also, I received a call yesterday from Kelly Thompson in Rates regarding the online payment fee. Pluris had responded to this question initially in a response dated November 21, 2012 and again in a conference call in January. We thought that this was no longer an open item. Do you know what the intent is in further exploration of the online payment fee? Pluris had discontinued this fee back in August 2012 after the new website was developed since the online payment fee was minimal anyway. I'd appreciate any feedback you may have on this. I don't mind contacting Kelly directly but wanted to talk to you about this first.

Thanks.

**Dan Winters**  
Controller



**Pluris Holdings LLC**

M 214.220.3413 / F 214.965.9090

O 2100 McKinney Ave, Suite 1550, Dallas, TX 75201

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## Ana VanEsselstine

---

**From:** Dan Winters <dwinters@plurisusa.com>  
**Sent:** Thursday, March 07, 2013 2:15 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** Proforma additions / Online Pmt Fee

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Thanks.

**Dan Winters**  
Controller



**Pluris Holdings LLC**

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## Ana VanEsselstine

---

**From:** Dan Winters <dwinters@plurisusa.com>  
**Sent:** Wednesday, March 06, 2013 1:21 PM  
**To:** Bart Fletcher; Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** Pluris Wedgefield - Utility Partners Amount in MFR

Bart/Ana – In response to our phone conversation earlier concerning the Utility Partners amounts listed under Contractual Services on B9, the total amount of \$839,867 for Water and Wastewater is correct as filed. There are no changes necessary to the MFRs.

Please let me know if you have any further questions.

**Dan Winters**  
Controller



**Pluris Holdings LLC**

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**O** 2100 McKinney Ave, Suite 1550, Dallas, TX 75201

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## Ana VanEsselstine

---

**From:** Dan Winters <dwinters@plurisusa.com>  
**Sent:** Friday, February 22, 2013 4:46 PM  
**To:** Bart Fletcher  
**Cc:** Maurice Gallarda; Ana VanEsselstine  
**Subject:** Pluris Wedgefield Expenses

Bart,

I have looked into the matter of double counting expenses in the MFRs and do not agree with your conclusion. The example you chose (Hein & Associates) to compare operating expenses to parent company expenses is coincidentally the same number in both places. Hein invoiced Pluris \$5,600 each for the completion of each of our five 2010 tax returns, including Pluris Holdings (allocated a percentage to Wedgefield through management fees in the MFR G-2) and Pluris Wedgefield (direct bill in the MFR B-9). This expense is not being double counted. As an added measure, I've also looked at the expenses invoiced from CJNW for accounting fees since this vendor is also included in both operating expenses and management fees. The operating expenses for CJNW were \$8,187 related to the preparation of the 2010 audit and annual report for Pluris Wedgefield. However, the management fees for CJNW were \$14,595 related to the preparation of the 2010 review and financials for Pluris Holdings and had nothing to do with the costs separately invoiced to Pluris Wedgefield.

As I mentioned on the phone, Pluris typically does business with the same vendors when possible so it is not uncommon to have a Holdings and Wedgefield expense from the same vendor. In this particular case, it was purely coincidental that the invoice was exactly the same for Pluris Holdings and Pluris Wedgefield and we are confident that this does not constitute double counting of expenses. Please let me know if I can be of any further assistance.

**Dan Winters**

Controller



**Pluris Holdings LLC**

M 214.220.3413 / F 214.965.9090

O 2100 McKinney Ave, Suite 1550, Dallas, TX 75201

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## Ana VanEsselstine

---

**From:** Dan Winters <dwinters@plurisusa.com>  
**Sent:** Friday, February 01, 2013 2:58 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** FW: Pluris Wedgefield, Inc. Response to Customer Care Center Costs  
**Attachments:** Call Center Findings.pdf; Utility Partners Letter Confirmation.pdf

Ana – see below for the email that was sent to Bart a little while ago. Please let us know if you have any questions.

## Dan Winters

Controller



### Pluris Holdings LLC

M 214.220.3413 / F 214.965.9090

O 2100 McKinney Ave, Suite 1550, Dallas, TX 75201

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---

**From:** Dan Winters  
**Sent:** Friday, February 01, 2013 12:32 PM  
**To:** 'BFletche@PSC.STATE.FL.US'  
**Cc:** Maurice Gallarda; Martin Friedman  
**Subject:** Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Mr. Fletcher,

Mr. Gallarda informed me of the issue that you brought to his attention concerning the determination of whether or not the Customer Care Center personnel costs had been included in the Pluris Wedgefield, Inc. MFRs. I have researched this issue and attached you will find a summary of my findings along with a letter from Utility Partners substantiating their charges, relating to the Customer Care Center cost allocation. Please review the attached and let me know if I can be of further assistance. The findings do demonstrate the need for additional expense to be added into the proforma year, over what was filed in the MFRs. I appreciate you bringing the matter to our attention.

Sincerely,

## Dan Winters

Controller



**Pluris Holdings LLC**

**M 214.220.3413 / F 214.965.9090**

**O 2100 McKinney Ave, Suite 1550, Dallas, TX 75201**

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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
Wedgfield	1,552	14.99%	\$	40,665
North Topsail	2,039	19.70%	\$	53,426
	<u>10,352</u>	<u>100%</u>	\$	271,505

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

## Ana VanEsselstine

---

**From:** Maurice Gallarda <mgallarda@plurisusa.com>  
**Sent:** Wednesday, February 27, 2013 11:56 AM  
**To:** Bart Fletcher; Ana VanEsselstine  
**Cc:** Dan Winters  
**Subject:** RE: Pluris Wedgefield Expenses

Good morning Bart,

I am emailing you a note as a follow up to Dan Winter's email to you (below), as it relates to your concern that Pluris had "double-expensed" items in its rate case application. Dan didn't hear back anything from you and I want to make sure the issue has been cleared up. Pluris has worked diligently to be both responsive and transparent to the PSC and has not "doubled-up" expenses.

Would you or Ana mind emailing me a note that you have been satisfied, and if not let us know if there is still a concern?

Best regards,

Maurice

**Maurice W. Gallarda, PE**  
Managing Member and Principal Engineer



### Pluris Holdings LLC

T 214.220.3412 F 214.965.9090

2100 McKinney Avenue, Suite 1550, Dallas, TX 75201

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---

**From:** Dan Winters  
**Sent:** Friday, February 22, 2013 3:46 PM  
**To:** [BFletche@PSC.STATE.FL.US](mailto:BFletche@PSC.STATE.FL.US)  
**Cc:** Maurice Gallarda; [avanesse@psc.state.fl.us](mailto:avanesse@psc.state.fl.us)  
**Subject:** Pluris Wedgefield Expenses

Bart,

I have looked into the matter of double counting expenses in the MFRs and do not agree with your conclusion. The example you chose (Hein & Associates) to compare operating expenses to parent company expenses is coincidentally the same number in both places. Hein invoiced Pluris \$5,600 each for the completion of each of our five 2010 tax returns, including Pluris Holdings (allocated a percentage to Wedgefield through management fees in the MFR G-2) and Pluris Wedgefield (direct bill in the MFR B-9). This expense is not being double counted. As an added measure, I've also looked at the expenses invoiced from CJNW for accounting fees since this vendor is also included in both operating

expenses and management fees. The operating expenses for CJNW were \$8,187 related to the preparation of the 2010 audit and annual report for Pluris Wedgefield. However, the management fees for CJNW were \$14,595 related to the preparation of the 2010 review and financials for Pluris Holdings and had nothing to do with the costs separately invoiced to Pluris Wedgefield.

As I mentioned on the phone, Pluris typically does business with the same vendors when possible so it is not uncommon to have a Holdings and Wedgefield expense from the same vendor. In this particular case, it was purely coincidental that the invoice was exactly the same for Pluris Holdings and Pluris Wedgefield and we are confident that this does not constitute double counting of expenses. Please let me know if I can be of any further assistance.

**Dan Winters**

Controller



**Pluris Holdings LLC**

M 214.220.3413 F 214.965.9090

O 2100 McKinney Ave, Suite 1550, Dallas, TX 75201

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Sunday, February 10, 2013 1:01 PM  
**To:** Ana VanEsselstine  
**Cc:** Bart Fletcher; Cheryl Bulecza-Banks; Maurice Gallarda  
**Subject:** RE: Pluris Wedgefield, Inc. Response to Customer Care Center Costs  
**Attachments:** PSC Clerk 18 (Call Center Documentation)(REDACTED).docx.pdf

Ana,  
Attached is what will be filed electronically on Monday and the confidential copy will go out on Monday by overnight delivery. Please do not hesitate to give me a call if you have any questions.  
Regards, Marty

**MARTIN S. FRIEDMAN**

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



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M: 407.310.2077  
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[www.sfflaw.com](http://www.sfflaw.com)

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---

**From:** Martin Friedman  
**Sent:** Sunday, February 10, 2013 12:24 PM  
**To:** 'Ana VanEsselstine'  
**Cc:** Bart Fletcher; Cheryl Bulecza-Banks; 'Maurice Gallarda'  
**Subject:** RE: Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Ana,  
We'll get this filed with the Clerk on Tuesday. Thanks for the reminder.  
Regards, Marty

**MARTIN S. FRIEDMAN**

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



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F: 407.830.8522  
M: 407.310.2077  
[mfriedman@sfflaw.com](mailto:mfriedman@sfflaw.com)  
[www.sfflaw.com](http://www.sfflaw.com)

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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Tuesday, February 05, 2013 10:35 AM  
**To:** Martin Friedman  
**Cc:** Bart Fletcher; Cheryl Bulecza-Banks  
**Subject:** FW: Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Hi Marty,

Dan sent us information regarding the call center employees that should be included in the docket file. Can you please file a redacted version with the appropriate confidentiality request with the Clerk?

Thanks!!  
Ana

---

**From:** Dan Winters [<mailto:dwinters@plurisusa.com>]  
**Sent:** Friday, February 01, 2013 2:58 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** FW: Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Ana – see below for the email that was sent to Bart a little while ago. Please let us know if you have any questions.

**Dan Winters**  
Controller



**Pluris Holdings LLC**  
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**From:** Dan Winters  
**Sent:** Friday, February 01, 2013 12:32 PM  
**To:** 'BFletche@PSC.STATE.FL.US'  
**Cc:** Maurice Gallarda; Martin Friedman  
**Subject:** Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Mr. Fletcher,

Mr. Gallarda informed me of the issue that you brought to his attention concerning the determination of whether or not the Customer Care Center personnel costs had been included in the Pluris Wedgefield, Inc. MFRs. I have researched this issue and attached you will find a summary of my findings along with a letter from Utility Partners substantiating their charges, relating to the Customer Care Center cost allocation. Please review the attached and let me know if I can be of further assistance. The findings do demonstrate the need for additional expense to be added into the proforma year, over what was filed in the MFRs. I appreciate you bringing the matter to our attention.

Sincerely,

**Dan Winters**  
Controller



**Pluris Holdings LLC**

**M 214.220.3413    F 214.965.9090**

**O 2100 McKinney Ave, Suite 1550, Dallas, TX 75201**

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Sunday, February 10, 2013 12:24 PM  
**To:** Ana VanEsselstine  
**Cc:** Bart Fletcher; Cheryl Bulecza-Banks; Maurice Gallarda  
**Subject:** RE: Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Ana,  
We'll get this filed with the Clerk on Tuesday. Thanks for the reminder.  
Regards, Marty

### MARTIN S. FRIEDMAN

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



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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Tuesday, February 05, 2013 10:35 AM  
**To:** Martin Friedman  
**Cc:** Bart Fletcher; Cheryl Bulecza-Banks  
**Subject:** FW: Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Hi Marty,

Dan sent us information regarding the call center employees that should be included in the docket file. Can you please file a redacted version with the appropriate confidentiality request with the Clerk?

Thanks!!  
Ana

---

**From:** Dan Winters [<mailto:dwinters@plurisusa.com>]  
**Sent:** Friday, February 01, 2013 2:58 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** FW: Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Ana – see below for the email that was sent to Bart a little while ago. Please let us know if you have any questions.

**Dan Winters**

Controller



**Pluris Holdings LLC**

M 214.220.3413 / F 214.965.9090

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---

**From:** Dan Winters

**Sent:** Friday, February 01, 2013 12:32 PM

**To:** 'BFletche@PSC.STATE.FL.US'

**Cc:** Maurice Gallarda; Martin Friedman

**Subject:** Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Mr. Fletcher,

Mr. Gallarda informed me of the issue that you brought to his attention concerning the determination of whether or not the Customer Care Center personnel costs had been included in the Pluris Wedgefield, Inc. MFRs. I have researched this issue and attached you will find a summary of my findings along with a letter from Utility Partners substantiating their charges, relating to the Customer Care Center cost allocation. Please review the attached and let me know if I can be of further assistance. The findings do demonstrate the need for additional expense to be added into the proforma year, over what was filed in the MFRs. I appreciate you bringing the matter to our attention.

Sincerely,

**Dan Winters**

Controller



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## Ana VanEsselstine

---

**From:** Maurice Gallarda <mgallarda@plurisusa.com>  
**Sent:** Friday, February 01, 2013 3:08 PM  
**To:** Bart Fletcher  
**Cc:** Ana VanEsselstine  
**Subject:** RE: Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Hi Bart,

Sorry that I was unable to take your call earlier. I was and still am on a conference call. I emailed Dan to get back to you and note that he sent Anna the earlier email to you. I hope Dan was able to help you.

Have a good weekend.

Maurice

**Maurice W. Gallarda, PE**  
Managing Member and Principal Engineer



**Pluris Holdings LLC**

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---

**From:** Dan Winters  
**Sent:** Friday, February 01, 2013 1:58 PM  
**To:** [avanesse@psc.state.fl.us](mailto:avanesse@psc.state.fl.us)  
**Cc:** Maurice Gallarda  
**Subject:** FW: Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Ana – see below for the email that was sent to Bart a little while ago. Please let us know if you have any questions.

**Dan Winters**  
Controller



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---

**From:** Dan Winters  
**Sent:** Friday, February 01, 2013 12:32 PM  
**To:** 'BFletche@PSC.STATE.FL.US'  
**Cc:** Maurice Gallarda; Martin Friedman  
**Subject:** Pluris Wedgefield, Inc. Response to Customer Care Center Costs

Mr. Fletcher,

Mr. Gallarda informed me of the issue that you brought to his attention concerning the determination of whether or not the Customer Care Center personnel costs had been included in the Pluris Wedgefield, Inc. MFRs. I have researched this issue and attached you will find a summary of my findings along with a letter from Utility Partners substantiating their charges, relating to the Customer Care Center cost allocation. Please review the attached and let me know if I can be of further assistance. The findings do demonstrate the need for additional expense to be added into the proforma year, over what was filed in the MFRs. I appreciate you bringing the matter to our attention.

Sincerely,

**Dan Winters**  
Controller



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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Thursday, January 24, 2013 5:50 PM  
**To:** Cody Gallarda; Ana VanEsselstine  
**Cc:** Maurice Gallarda; Beverly Yopp  
**Subject:** RE: Pluris Wedgefield Rate Case

Ana,  
Did you ever email a list of issues so they can be better prepared rather than hitting them "cold"?

### MARTIN S. FRIEDMAN

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



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---

**From:** Cody Gallarda [<mailto:c.gallarda@gmail.com>]  
**Sent:** Thursday, January 24, 2013 2:58 PM  
**To:** Ana VanEsselstine  
**Cc:** Martin Friedman; Maurice Gallarda; Beverly Yopp  
**Subject:** Re: Pluris Wedgefield Rate Case

Hi Ana,  
Yes, I have you down for 1:00 - 1:30 EST tomorrow. Does that still work?

Best,  
Cody

On Thu, Jan 24, 2013 at 1:26 PM, Ana VanEsselstine <[AVanesse@psc.state.fl.us](mailto:AVanesse@psc.state.fl.us)> wrote:  
Hi Marty,  
I am sure you are on the road. Beverly, I have heard back from you and thank you.

Cody or Maurice are either (or both) of you available tomorrow for a conference call?  
Best,

Ana

---

**From:** Ana VanEsselstine  
**Sent:** Tuesday, January 22, 2013 12:50 PM  
**To:** 'Martin Friedman'

**Cc:** Maurice Gallarda; Cody Gallarda; Beverly Yopp  
**Subject:** RE: Pluris Wedgefield Rate Case

Hi Marty,

Can we do Friday at 1:00 or 1:30 EST? Staff is still working up a list of questions and should have it to you no later than tomorrow morning.

Best,  
Ana

---

**From:** Martin Friedman [mailto:[MFriedman@sfflaw.com](mailto:MFriedman@sfflaw.com)]  
**Sent:** Friday, January 18, 2013 10:43 AM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda; Cody Gallarda; Beverly Yopp  
**Subject:** Pluris Wedgefield Rate Case

Ana,

Cody is not available next Thursday, but is available the following day, late morning and anytime in the afternoon. Also it will facilitate the call if Cody has more detail on what the Staff wants to discuss.

Regards, Marty

**Martin S. Friedman**

**SUNDSTROM,  
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## Ana VanEsselstine

---

**From:** Maurice Gallarda <mgallarda@plurisusa.com>  
**Sent:** Monday, January 21, 2013 12:36 PM  
**To:** James McRoy  
**Cc:** Ana VanEsselstine; Bart Fletcher; Joe Kuhns; Kenneth Pratt; Dan Winters; 'Martin Friedman (MFriedman@sfflaw.com)'; Tina Odisho  
**Subject:** Customer Comments Follow up - Final  
**Attachments:** Customer Comments Wedgefield - Final 121131026AM.xlsx

Hello Mr. McRoy,

Attached is a copy of the follow up record for the customers who spoke at the customer meeting, as well as other customers during the time spent in meetings at homes in Wedgefield. I believe Pluris has completed all that it can at this point. Pluris cannot speak on behalf of the customers but believes that all customers' original thinking was impacted by the information provided during the follow up.

Pluris spent considerable time in explaining the regulatory relationship between Pluris and the FDEP and the various requirements of the FDEP in regulating the quality of both drinking water and wastewater. Comparisons were provided (Consumer Confidence Reports) to all showing the quality of the water in Wedgefield and other governmental owned utilities including the City of Cocoa, Orlando Utilities Commission and Orange Utilities.

The single greatest revelation to all customers was that the water in Wedgefield is not hard as customers had thought and that even so, the water is softened at the plant. Hardness tests were conducted at all the homes who requested and in the presence of the customer. Pressure was also tested at each home that requested this and Mr. Chiota who spoke of low pressure in his home realized it was not Pluris's service line to his home but his interior plumbing he had completed.

Pluris had two residents present for the monthly bacteriological sampling in January and both were unaware of the FDEP approving the 8 sampling sites within the system to test. Both customers witnessed the sampling and had no further comment when specifically asked regarding the FDEP protocol in sampling. Both stated to Mr. Kuhns that Pluris had followed the FDEP protocol. Both were invited to attend every month if they would like to and Mr. Maslowski (the customer who claimed his water would turn brown in his shower in the customer meeting (and recanted that statement after investigating his shower - see his comments and letter)) agreed to do 6 months of witnessing the sampling. Mr. Maslowski at the end of his investigation stated that the water in Wedgefield is as good as Cocoa's, Orlando Utilities Commission's and Orange County Utilities' in his letter.

Please review each and every one of the comments, letters and emails provided.

Pluris spent significant effort in reaching out to all of the customers and non-customers, to meet with each and discuss their concerns. Not all responded to Pluris's attempt to reach but all were reached out to. Even Mr. Mehochko was contacted a number of times to get together with him and he did not respond to schedule a convenient time for him. After a number of factual information was provided including the Consumer Confidence Reports with actual laboratory test data for Wedgefield, Cocoa, Orange County Utilities and Orlando Utility Commission, Pluris can only assume most of his points made in his PowerPoint presentation were answered.

Please let us know if there is any further action the PSC requires of Pluris in this regard. Hard copies of the spreadsheet are being bound and sent to you.

Sincerely,  
Maurice Gallarda

**Maurice W. Gallarda, PE**  
Managing Member and Principal Engineer



**Pluris Holdings LLC**

T 214.220.3412 / F 214.965.9090

2100 McKinney Avenue, Suite 1550, Dallas, TX 75201

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Friday, January 18, 2013 6:09 PM  
**To:** Ana VanEsselstine; Bart Fletcher  
**Cc:** Maurice Gallarda  
**Subject:** Pluris Wedgefield Rate Case  
**Attachments:** PSC Clerk 16 (Summary of Pro Formas -unredacted).pdf

Ana & Bart,

Attached is a Summary of Pro Forma Plant and Expenses which we are requesting. Since we have submitted these piecemeal we thought a summary would be helpful. As you can see it is also being filed with the Clerk.

Regards, Marty

MARTIN S. FRIEDMAN

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



**SUNDSTROM, FRIEDMAN & FUMERO,  
LLP**

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< p class=MsoNormal style='line-

height:115%>F: 407.830.8522

M: 407.310.2077

[mfriedman@sfflaw.com](mailto:mfriedman@sfflaw.com)

[www.sfflaw.com](http://www.sfflaw.com)

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Friday, January 18, 2013 10:43 AM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda; Cody Gallarda; Beverly Yopp  
**Subject:** Pluris Wedgefield Rate Case

Ana,  
Cody is not available next Thursday, but is available the following day, late morning and anytime in the afternoon. Also it will facilitate the call if Cody has more detail on what the Staff wants to discuss.

Regards, Marty

**Martin S. Friedman**

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## Ana VanEsselstine

---

**From:** Maurice Gallarda <mgallarda@plurisusa.com>  
**Sent:** Monday, January 14, 2013 11:18 AM  
**To:** Ana VanEsselstine; Bart Fletcher; James McRoy  
**Cc:** 'Martin Friedman (MFriedman@sflaw.com)'; Dan Winters; Kenneth Pratt  
**Subject:** Additional OPC Questions  
**Attachments:** Additional OPC Questions - Pluris Response 111131013 AM.pdf

Good morning Ms. VanEsselstine, Mr. Fletcher and Mr. McRoy,  
Please see the attached PDF which includes the OPC's requests sent late Friday, along with Pluris's responses. As always the question is followed by a response highlighted in blue. I trust that you have received the FedEx from Friday which includes a larger print of the Pluris office layout. Please advise otherwise.

Sincerely,  
Maurice Gallarda

**Maurice W. Gallarda, PE**  
Managing Member and Principal Engineer



**Pluris Holdings LLC**

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2100 McKinney Avenue, Suite 1550, Dallas, TX 75201

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## Ana VanEsselstine

---

**From:** Maurice Gallarda <mgallarda@plurisusa.com>  
**Sent:** Friday, January 11, 2013 6:10 PM  
**To:** Ana VanEsselstine; Bart Fletcher  
**Cc:** Martin Friedman; Kenneth Pratt; Dan Winters  
**Subject:** {BULK} RE: Pluris Wedgefield Rate Case

**Importance:** Low

Hello Ms. VanEsselstine and Mr. Fletcher,

We received the latest OPC letter and knowing time is of the essence will try to get responses back on items in the letter to you as early as possible to assist you. Some of the items have already been addressed in prior data requests from the PSC. One of the items in the subject letter is;

8. Rent Charged to Pluris Holdings (Question 6.k.) In its response to Staff's 3rd Data Request, Pluris stated that the office lease was in the name of Stockdale Investment Group (SIGI) and Pluris occupies and was charged 50% of the \$51,844 in rent charged. Four employees are assigned to the corporate office in Dallas. They are Maurice Gallarda, Kenneth Pratt, Tina Odisho, and Dan Winters. The total space including office and shared areas for copiers and supplies Pluris uses encompasses 1,620 square feet. OPC believes the following questions regarding rent should be answered by the company:
  - a. The diagram attached to the data response was so small that the majority of the print was illegible. Please provide a larger copy of the diagram, with color print so that the print detail is legible.
  - b. Please provide a copy of the lease agreement referred to in response to Staff's 3<sup>rd</sup> Data Request No. 6.k. If the lease is a sublease from PRIM, also please provide a copy of the lease to PRIM.
  - c. Please provide an explanation of the total office layout provided on the diagram, including the number of offices and common space, the square footage of each office and common space, which person uses each office and common space, and identify the company or companies which each person serves.
  - d. If there are common officers and employees, please provide what percentage of time is spent on each company on a weekly basis for 2011 and 2012.

Some of the items 1.a. requires a hardcopy so I am having a FedEx with 4 hardcopies sent to you (Ms. VanEsselstine) today for Monday morning delivery. The hardcopies are printed out on 11" x 17" paper and should address any concern regarding illegible font sizes.

Marty – you are also being sent a hardcopy via FedEx.

Sincerely,  
Maurice Gallarda

**Maurice W. Gallarda, PE**  
Managing Member and Principal Engineer



**Pluris Holdings LLC**

T 214.220.3412 / F 214.965.9090

2100 McKinney Avenue, Suite 1550, Dallas, TX 75201

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**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]

**Sent:** Friday, January 11, 2013 9:28 AM

**To:** Ana VanEsselstine; Bart Fletcher

**Cc:** Maurice Gallarda

**Subject:** Pluris Wedgefield Rate Case

Ana & Bart,

If you are contemplating imputing allocations for the East Lauderdale "system" I think it would be a good idea to discuss it so that we do not have to argue about it at the Agenda.

Regarding, Marty

**MARTIN S. FRIEDMAN**

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



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**OPC Issues and Concerns - Pluris Wedgefield, Inc. - Docket No. 120152-WS**

1. **Common Affiliate Owners and Employees.** In response to Question 1.b., Pluris stated that Pluris Holdings, LLC (Pluris), Stockdale Investment Group, Inc. (SIGI), and Primoris Services Company (PRIM) “have no formal or legal relationship” but “There are common owners in all three companies.” OPC believes that it is necessary to be provided all owners of Pluris Holdings, LLC, and which owner(s) are common to each of the above companies, including the names and positions of all common officers, directors and staff.

*Presented in the following is a table listing common owners in Pluris, SIGI and Primoris*

<b>Names</b>	<b>Pluris Membership %</b>	<b>SIGI Membership %</b>	<b>Primoris Ownership % (NASDAQ: PRIM)</b>
Brian Pratt	84.0	55.5	35
Melissa Pratt	5.5	19.2	<1
Ken Pratt	5.5	22.6	<1
Maurice Gallarda	2.5	0	0
Peter Moerbeek	2.3	0	<1
Joe Pastora	0.0	2.7	<1
Tom Tekulve	0.2	0	<1

*Brian Pratt – President, CEO, Chairman of the Board of Primoris. Majority owner Pluris and SIGI.*

*Melissa Pratt – Minority owner SIGI (Managing Member) and Pluris (non-active).*

*Ken Pratt – Minority owner Pluris (Managing Member) and SIGI (non-active).*

*Maurice Gallarda – Minority owner Pluris (Managing Member).*

*Peter Moerbeek - CFO of Primoris. Minority owner Pluris (non-active).*

*Joe Pastora - Minority owner SIGI (Managing Member).*

*Tom Tekulve – VP Finance, Primoris. Minority owner Pluris (non-active).*

2. **Officer Compensation.** Schedule E-6 of the PSC Annual Report form for Class A or B Water and Wastewater Utilities under the category of Compensation of Officers it states: “For each officer, list the time spent on respondent as an officer compared to time spent on total business activities and the compensation received as an officer from the respondent.” On the Pluris Wedgefield 2011 Annual Report, it states that Maurice Gallarda spends 16% of his time as president and Kenneth Pratt spends 20% as vice president of Pluris Wedgefield, and none of the officers receive compensation as an officer. In its response to Staff’s 3<sup>rd</sup> Data Request, the company requested confidential treatment of the compensation paid to its officers, including salaries, benefits and payroll taxes. OPC believes that it is necessary to obtain the following information:

- a. Please confirm or deny that the answer provided on the 2011 annual report addressed only the amount of allocated compensation to Pluris Wedgefield and the percentages of time shown did not provide the actual percentage of time spent on Pluris Wedgefield compared to the total business activities for each officer. Please explain your answer.

*The percentages reflect the approximate time spent during a 40 hour work week in the Wedgefield utility for the officers as employees.*



- b. If the answer to question a. above is that the annual report reported only the allocated percentage of time, please provide the actual number of hours per week that each officer spent on Pluris Wedgefield business in 2011 and 2012.

*Corporate expense including employee compensation is allocated per the PSC rules by calculating the percentage of equivalent dwelling units ("EDUs") in each utility and dividing by the total EDUs of the combined utilities. There was no additional compensation paid to officers in Pluris above the salary compensation as employees. The allocations reasonably reflected the actual hours spent for Mr. Gallarda and Mr. Pratt.*

- c. Please provide a list of all other companies and business activities in which each Pluris officer is involved.

*Maurice Gallarda – None*

*Ken Pratt – None*

*Brian Pratt – Pluris and SIGI*

- d. Please state the number of hours each week that Mr. Gallarda spends working on Pluris Holdings along with the number of hours per week spent on other business activities during 2011 and 2012.

*In 2011 and 2012 Mr. Gallarda averaged between 60 and 70 hours a week on Pluris. No hours were spent on other business activities.*

- e. Based on an internet search, Mr. Kenneth Pratt is an active real estate professional who is the Vice President of Stockdale Investment Group and is associated with Allie Beth Allman & Associates Real Estate Firm. Please state the number of hours per week that Mr. Kenneth Pratt spent working as Vice President of SIGI and working for the Allman Real Estate Firm in 2011 and 2012. Please list any other companies or businesses to which Mr. Kenneth Pratt performs professional business services and the number of hours worked per week for each company or business during 2011 and 2012.

*Mr. Pratt held an active real estate license in California before the move to Texas. Mr. Pratt handled the SIGI/Pluris office lease and was required to register with a Texas real estate firm to be legal. There were no commissions paid to Mr. Pratt and Pluris along with rate payers were the benefactors of this. Mr. Pratt did assist his father Brian Pratt in like manner in his father's purchase of a residence in Dallas. Mr. Pratt works at least 40 hours a week on Pluris business. He may provide advice occasionally to his sister's company, SIGI, when requested to do so, for which he is not paid and he does so "on his own time". This is not unlike Commission attorneys who work a 40 hour week but probably are asked legal questions by friends and family.*

3. **Officer Compensation.** OPC believes that it is necessary for the company to explain whether any allocation of the pro forma salary of Mr. Dan Winters for his accounting and financial duties for Pluris was allocated to Pluris Southgate and if not, why not. Also, please explain which company is Mr. Winters' employer and whether he performs any other professional business activities for SIGI, or PRIM. If he does perform any services for any business or organization other than Pluris Holdings, please provide the number of weekly hours worked for each company during 2011 and 2012.

*Mr. Winters was hired on July 2, 2012 and is a full time Pluris employee. Mr. Winters works between 45 and 60 hours per week and all of his time is spent on Pluris. Since Sarasota County requires actual time records for officers instead of utilizing an ERC allocation, Pluris Wedgefield deducted the amounts included in the Southgate rate case before making the allocation of officer salaries on an ERC basis to its other systems.*

4. **Automobile Expenses.** In its response to Question 6 of Staff's 3rd Data Request, the company provided a detailed list of the Pluris automobile expenses which are allocated to the Pluris subsidiaries. OPC would like to obtain an explanation if Pluris Holdings pays 100% for the vehicle costs for Mr. Gallarda and Mr. Pratt. Please explain if these vehicles are used solely for Pluris Holdings work, whether the vehicles are driven home each day, whether the officers are allowed to use the vehicles for personal use and if so how many miles per month are used for personal purposes. Also explain whether the vehicles are used for any other business purpose such as real estate investment or sales.

*Pluris pays 100% of the vehicle costs for company vehicles and both Mr. Gallarda and Mr. Pratt are provided company vehicles. Automobile expenses are allocated per the PSC rules by calculating the percentage of equivalent dwelling units ("EDUs") in each utility and dividing by the total EDUs of the combined utilities. The company allows Mr. Gallarda and Mr. Pratt to drive the vehicles to and from work. Both Mr. Gallarda and Mr. Pratt have privately owned vehicles for their personal use. The company vehicles are not used for any other business purpose.*

5. **Automobile Expenses.** OPC would like to know why it is reasonable for the Pluris Wedgefield to pay a share of the cost to pay off Mr. Kenneth Pratt's old Land Rover lease, and what value the old Land Rover contributed to the provision of utility service to customers.

*Pluris is allowed to allocate corporate costs as described in 2.b. above. Lease rates are based on estimated annual mileage driven and rates are less on fewer miles driven and higher when annual mileage is estimated to be higher. Pluris attempts to get the lowest rate possible and pays the difference at the end of the lease period, should there be any mileage overage. There is no material difference between paying a higher upfront lease rate with a higher annual mileage allotment vs a lower upfront lease rate with a lower annual mileage allotment that requires a mileage payoff amount at the end of the lease.*

6. **Travel Expenses.** Upon review of the travel expenses incurred which were provided in response to Staff's 3<sup>rd</sup> Data Request, many of the flights taken were for first class tickets, had insufficient documentation, related to acquisition costs, contained extra in-flight services, were premium car rental costs, and travel costs for moving including those for Mr. Gallarda's spouse. Unless the company can provide a reasonable allowance for non-acquisition related business directly related to the provision of utility services to Pluris Wedgefield, OPC believes that majority of the travel costs allocated to Wedgefield should be disallowed. Sufficient justification should include the business purpose of the trip, the length of the trip, and an explanation of each item including adjustments to show the non-premium level of travel costs.

*Pluris policy for all employees is travel coach class on airlines. Pluris employees are allowed to upgrade with miles used on Airline programs. The extra in-flight services were solely related to internet access when available in-flight. This service allows an employee to have continuous access to emails and the company server. This in-flight service is a valuable tool particularly with the amount of travel conducted by both Mr. Gallarda and Mr.*

*Pratt. Pluris policy requires employees to stay at reasonable lodging establishments. Nearly all stays by employees have been at the Marriott hotel chains of Courtyards, Fairfield Inns, and Springhill Suites. This is done as there are benefits of meals included in the rates. Very seldom do employees stay at full service Marriott hotels. Pluris policy also requires employees to rent no more than a mid-size vehicle on trips and this typically includes vehicles such as a Chevrolet Impala, Ford Focus or Nissan Altima. Pluris has provided the PSC staff with travel detail.*

7. **Corporate Insurance.** OPC believes it is necessary to obtain the amount of insurance charged to Pluris related to automobiles, liability, any umbrella excess liability or director and officer liability insurance. Please explain whether any of the insurance coverage extends to PRIM or SIGI operations or personal liability of the officers of Pluris, PRIM or SIGI.

*Insurance information has been provided to the PSC staff. No Pluris insurance extends to Primoris or SIGI operations or personal liability of the officers of Pluris, Primoris or SIGI.*

8. **Rent Charged to Pluris Holdings (Question 6.k.)** In its response to Staff's 3rd Data Request, Pluris stated that the office lease was in the name of Stockdale Investment Group (SIGI) and Pluris occupies and was charged 50% of the \$51,844 in rent charged. Four employees are assigned to the corporate office in Dallas. They are Maurice Gallarda, Kenneth Pratt, Tina Odisho, and Dan Winters. The total space including office and shared areas for copiers and supplies Pluris uses encompasses 1,620 square feet. OPC believes the following questions regarding rent should be answered by the company:

- a. The diagram attached to the data response was so small that the majority of the print was illegible. Please provide a larger copy of the diagram, with color print so that the print detail is legible.

*Pluris has prepared 11" x 17" prints of the diagram and FedEx'd them to the PSC on Friday, 1.11.13.*

- b. Please provide a copy of the lease agreement referred to in response to Staff's 3<sup>rd</sup> Data Request No. 6.k. If the lease is a sublease from PRIM, also please provide a copy of the lease to PRIM.

*Pluris already provided a copy of the 71 page lease to the PSC.*

- c. Please provide an explanation of the total office layout provided on the diagram, including the number of offices and common space, the square footage of each office and common space, which person uses each office and common space, and identify the company or companies which each person serves.

*This information is provided on the diagram and can be clearly seen in the larger version.*

- d. If there are common officers and employees, please provide what percentage of time is spent on each company on a weekly basis for 2011 and 2012.

*The only "common officer" to Pluris is Brian Pratt and Mr. Pratt spends approximately 2 to 3 hours per week on Pluris business and does not receive compensation for his service.*

9. **Telephone Expense.** Please explain whether the listed telephone expenses of \$58,264 represent 100% of the total charges or are an allocation between any bills charged or shared between Pluris and SIGI or PRIM. If 100% of the bills are charged to Pluris Holdings,

please explain whether any of the expenses are used for any personal or other business purpose, and whether there is any allocation of telephone expense charged to either SIGI or PRIM, or other business entities. Please provide a breakdown of the telephone expenses incurred specifically by Mr. Gallarda and Mr. Kenneth Pratt.

*100% of the \$58,264 in telephone expenses are solely related to Pluris and are allocated to the utilities on the basis of ERCs, previously discussed. A complete break out of the telephone costs have been provided to the PSC.*

10. Income Tax Returns. Upon review of the company's response to Staff's 3<sup>rd</sup> Data Request, OPC believes that additional questions and documentation requirements regarding the reasonableness of accounting/tax fees are necessary. Pluris has requested recovery of \$24,535 in total accounting/tax fees, \$9,940 of which was for preparation of 2010 income tax returns from three vendors. Upon review of the supporting documentation for travel, the \$600 expense to LTS&P CPAs corresponds to the invoice from LTSP CPAs sent to Maurice & Deborah Gallarda for preparation of their 2010 federal and California personal income tax returns. OPC believes that preparation of personal income tax returns are not reasonable business expenses which should be paid for by the customers. In order to substantiate the other accounting and tax fees requested, OPC believes that it is appropriate to obtain a copy of the each invoice in order to support the inclusion of the costs for rate recovery.

*Pluris has provided the PSC with a break out of the accounting firm charges for tax preparation. It is common for management employees in companies to have tax preparation provided as a benefit and part of compensation, especially if a change in state residency is made at the request of the company.*

11. New SCADA System for Water Treatment Facility -MIEX Plant. In its response to staff engineer James McRoy, Pluris addressed staff's concerns about the retirement and subsequent purchase of a new SCADA system for the water treatment plant.

- a. Please explain whether Pluris had any communications with Utilities, Inc., (the former owner of the Wedgefield system) regarding the SCADA system purchased. If so, please describe what questions were asked and what information was communicated back to Pluris regarding any problems encountered or solutions implemented by Utilities Inc. Did the Southgate system have similar problems with its SCADA system and if so what solutions did Pluris undertake?

*At the time of the acquisition Utilities, Inc. ("UI"), exceeded the Florida Department of Environmental Protection ("FDEP") limits on TTHMs and HAA5s. Pluris met with UI as well as the manufacturer of the MIEX system who provided the SCADA tie-in with the existing operation systems of the water treatment plant (pre-MIEX period equipment). There were a number of operational and non-operational issues surrounding not just the SCADA system but system integration; not necessarily the result of anyone's negligence, but that of improving the system.*

*Pluris addressed the SCADA system in detail in a prior interrogatory. In its November 30, 2012 letter to Mr. James McRoy of the PSC Pluris wrote;*

*"In accordance with your request, Pluris is providing a brief summary of the reasons for Pluris having to replace the original SCADA system provided by ORICA, the manufacturer of the magnetic ion exchange treatment plant ("MIEX®") the former owner added to the existing water treatment plant.*

*Pluris acquired the Wedgefield system from Utilities Inc. ("UI") in November, 2009. Over the next 12 months following the acquisition, Pluris identified a number of operational items with the ORICA SCADA system, including but not limited to SCADA software not communicating with many different nodes important in operating valves, motors and procedures for backwashes and resin regeneration cycles.*

*Pluris placed numerous calls to Orica personnel in an attempt to rectify the issues referenced. ORICA's response varied with each call from software licensing agreements needed to be entered into and paid annually, to not being able to solve the operational items with the current ORICA software.*

*ORICA personnel resisted any onsite field trips to solve the items and instead initially attempted to effect repairs remotely through internet connection only and this did not solve any of the identified issues. Pluris staff continued to press Orica for answers and corrections only to be delayed by one reason or another. Through continued and blunt discussions, ORICA did arrange to have a repair technician travel to the facility in an attempt to solve the issues outlined by Pluris staff. The ORICA technician spent twelve hours at the facility only to inform Pluris that he was unable to correct the issues and that Pluris would need to have another repair company come in to investigate the issues.*

*Pluris immediately contacted E&R Mechanical ("E&R"), an electrical contractor well respected and experienced in SCADA systems to perform onsite diagnostics to identify the issues and recommend solutions. E&R's technician identified the issues within ½ hour of being on site. In order to integrate SCADA seamlessly across the MIEX component and the total water plant, the company's recommendation was to have ORICA amend its software or to install new software.*

*Based on ORICA's resistance to work with Pluris on solutions and the concern that ORICA could not solve the issues with the current software and would have to amend its own software, Pluris discussed potential SCADA solutions further with E&R.*

*Pluris knew it had to make a decision and key items influencing this decision included the following:*

- 1. An amending of the existing SCADA system and/or installation of a new SCADA system was necessary to address operational items that may not have been known during the original design in 2006.*
- 2. Pluris had substantial concern that ORICA would use the issues to increase costs for amending software to address the new issues. This would not be fair to rate payers if another company would be more cooperative and competitive in a new SCADA system.*
- 3. E&R guaranteed that a new SCADA system would allow Pluris staff to make adjustments to operational procedures to enhance the performance of the MIEX treatment system.*
- 4. E&R guaranteed that the SCADA system would provide seamless integration across the entire water treatment plant.*
- 5. E&R committed to providing ongoing service calls to cover their system in a timely manner following any requests for service from Pluris. ORICA would take several days to a week to respond.*

*Based on the aforementioned, Pluris made the decision to install the E&R SCADA system in lieu of amending the ORICA system to insure complete integration."*

*Pluris believed it acted in the best interest of customers with the new SCADA system.*

- b. Please explain whether Pluris Holdings or any of its officers, shareholders, or employees has any affiliation with E&R Mechanical other than purchasing this software. Affiliation includes but is not limited to relationships such as common ownership, shareholders, or family members and/or any existing contractual relationships between Pluris Holdings, PRIM, and/or SIGI.**

*There are no such relationships or affiliations. E&R was one of two companies that provided proposals for "non-proprietary" software. E&R was selected on the basis of technical support and cost.*

- c. Please provide the dollar amount of plant, accumulated depreciation and depreciation expense for the new SCADA system that was installed, including the date installed.**

*This information has already been provided to the PSC.*

- d. Please provide the dollar amount of plant, accumulated depreciation and depreciation expense, and any 2011 operating expenses for annual software maintenance incurred for the old SCADA system that was retired from the books when the new SCADA was installed.

*This information has already been provided to the PSC.*

- e. Did Pluris perform any type of analysis to compare the reasonableness and cost of fixing the old system compared to abandoning the old system and purchasing the new system. If so, explain the basis and provide any documentation to support Pluris' decision to abandon the old system and purchase the new system.

*See 11.a. above.*

- f. Please provide what efforts were undertaken by Pluris to enforce any warranties or collect for any damages which were caused by the failure of the old SCADA system to work properly or caused by the failure of the prior vendor to help resolve the problems.

*The primary reason for installing new software was due to the expense of ORICA insisting on annual software licensing and maintenance agreements before providing service. The cost of annual renewal and the maintenance agreements were determined to be more expensive than the onetime upfront cost for the "non-proprietary" software offered by E&R Electrical and their cooperation with Wedgefield staff to resolve any issues. The rate payers benefit from the "non-proprietary" software in both cost and technical service support.*

## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Friday, January 11, 2013 10:28 AM  
**To:** Ana VanEsselstine; Bart Fletcher  
**Cc:** Maurice Gallarda  
**Subject:** Pluris Wedgefield Rate Case

Ana & Bart,

If you are contemplating imputing allocations for the East Lauderdale "system" I think it would be a good idea to discuss it so that we do not have to argue about it at the Agenda.

Regarding, Marty

**MARTIN S. FRIEDMAN**

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



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[www.sfflaw.com](http://www.sfflaw.com)

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Friday, January 11, 2013 10:14 AM  
**To:** Ana VanEsselstine; Bart Fletcher  
**Cc:** Maurice Gallarda  
**Subject:** Pluris Wedgefield Rate Case  
**Attachments:** East Lauderdale County Water and Fire Protection Authority Letter on Meter Read.pdf

Ana & Bart,

Attached is a letter which I believe clarifies your question this morning regarding the meter reading at East Lauderdale.

I will be filing a letter today waiving statutory deadlines through the April 9 Commission Conference.

Let me know if you have any additional questions or concerns.

Regards, Marty

**MARTIN S. FRIEDMAN**

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



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## Ana VanEsselstine

---

**From:** Maurice Gallarda <mgallarda@plurisusa.com>  
**Sent:** Wednesday, January 09, 2013 2:55 PM  
**To:** James McRoy  
**Cc:** Bart Fletcher; Ana VanEsselstine; Martin Friedman (MFriedman@sfflaw.com); Dan Winters; Joe Kuhns; Kenneth Pratt  
**Subject:** Updated Customer Comments  
**Attachments:** Customer Comments Wedgefield - Updated through 10813 at 214 PMCST by MWG.xlsx

Hello Mr. McRoy,

Attached is the latest update (as of this morning) for all of the customers who spoke. There are a number of customers who did not speak that had filed complaints with the PSC that we also included at the bottom (or last sheet) of the Excel workbook.

The customers that have forwarded letters following meetings with them are color-coded blue in the first cell. The letters will all be emailed to you from the customers who sent them to Pluris and the others were mailed directly to the PSC. Mr. Friedman will file all of them with the PSC Clerk when we have them all. We are expecting about 5 more.

We hope to wrap up the customer follow up by the end of the week. We have reached out to all and been in contact with most. Mr. Mehochko, the Wedgefield HOA president (a non-customer) has not responded back to a number of Joe Kuhns' attempts to get together with him to discuss the concerns he raised in his PowerPoint Presentation. We will continue through the week to encourage him to meet but are not optimistic that he will respond.

We completed our first monthly round of bacteriological sampling and two customers - Ms. Pamela Dimarzio (the former chemical engineer) and Mr. Walter Maslowski (the retired Naval Officer) were both present for the first day (Monday of this week 1.7). Mr. Maslowski was present for day two (yesterday, Tuesday 1.8). Ms. Dimarzio said she could not make it. We went through all of the FDEP requirements for sampling, refrigeration (while waiting for lab pick up), and chain of custody sign off when Tri-Lab arrived for pick up. We asked both Mr. Maslowski and Ms. Dimarzio if they had any questions. Mr. Maslowski said he had none and Ms. Dimarzio said she needed to think about it. Both acknowledged that Pluris followed the FDEP requirements. Mr. Kuhns sent both a follow up email today inviting both back next month for the monthly sampling. Mr. Maslowski signed on several weeks ago for the first 6 months and re-evaluate if he wants to continue. Ms. Dimarzio hasn't said whether she would like to continue at this point.

If you have any questions please feel free to contact us.

Unrelated – We sent Mr. Friedman Data Request No. 4 responses today for filing.

Best regards,  
Maurice Gallarda

**Maurice W. Gallarda, PE**  
Managing Member and Principal Engineer



**Pluris Holdings LLC**

T 214.220.3412    F 214.965.9090

2100 McKinney Avenue, Suite 1550, Dallas, TX 75201

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[Click to read full disclaimer.](#)

## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Monday, January 07, 2013 8:30 AM  
**To:** Ana VanEsselstine  
**Cc:** Bart Fletcher  
**Subject:** RE: {BULK} RE: Pluris - 5th Data Request

**Importance:** Low

Thank you.

### MARTIN S. FRIEDMAN

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



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**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Monday, January 07, 2013 8:04 AM  
**To:** Martin Friedman  
**Cc:** Bart Fletcher  
**Subject:** RE: {BULK} RE: Pluris - 5th Data Request

Please see attached.  
Thanks,  
Ana

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**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Friday, January 04, 2013 5:16 PM  
**To:** Ana VanEsselstine  
**Cc:** Bart Fletcher  
**Subject:** {BULK} RE: Pluris - 5th Data Request  
**Importance:** Low

< p class=MsoNormal>Ana,

Please email me the Data Request in Word format. Thanks. Marty

**MARTIN S. FRIEDMAN**

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**From:** Ana VanEsselstine [<mailto:AVanes se@psc.state.fl.us>]  
**Sent:** Friday, January 04, 2013 8:51 AM  
**To:** Martin Friedman  
**Cc:** Bart Fletcher  
**Subject:** Pluris - 5th Data Request

Hi Marty,

The attached was mailed out today.

Thanks and have a great day!

*Ana*

Mrs. Ana VanEsselstine  
Regulatory Analyst II  
Division of Accounting and Finance

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Phone: (850) 413-6435  
Fax: (850) 413-6436

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sflaw.com>  
**Sent:** Friday, January 04, 2013 5:16 PM  
**To:** Ana VanEsselstine  
**Cc:** Bart Fletcher  
**Subject:** {BULK} RE: Pluris - 5th Data Request

**Importance:** Low

Ana,  
Please email me the Data Request in Word format. Thanks. Marty

### MARTIN S. FRIEDMAN

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**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Friday, January 04, 2013 8:51 AM  
**To:** Martin Friedman  
**Cc:** Bart Fletcher  
**Subject:** Pluris - 5th Data Request

Hi Marty,

The attached was mailed out today.

Thanks and have a great day!

*Ana*

Mrs. Ana VanEsselstine  
Regulatory Analyst II  
Division of Accounting and Finance

Florida Public Service Commission

2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Phone: (850) 413-6435  
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## Ana VanEsselstine

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**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Thursday, December 27, 2012 12:36 PM  
**To:** Ana VanEsselstine; Bart Fletcher  
**Cc:** Maurice Gallarda; Dan Winters  
**Subject:** {BULK} Pluris Wedgefield, Inc. Rate Case

**Importance:** Low

Ana,

Attached is the response to Staff's 3<sup>rd</sup> Data Request, the original of which will be filed with the Clerk tomorrow. I have redacted the salary information, but will be glad to provide it to you when you can confirm it will be subject to confidentiality. Let me know if you need anything else. I know that the Utility is finalizing responses to an informal data request from Kelly Thompson, and we have a response to Staff's 4<sup>th</sup> Data Request due Jan. 21<sup>st</sup>.

; Regards, Marty

**MARTIN S. FRIEDMAN**

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PSC Clerk 12 (3d Data Request Responses) (REDACTED).pdf (3.9MB)  
Expense reports and American Express statements.pdf (3.4MB)  
Travel.xlsx (37.2KB)  
AMEX Statements.pdf (4.7MB)  
  
(12.1MB)

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## Ana VanEsselstine

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**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Monday, November 19, 2012 3:41 PM  
**To:** Ana VanEsselstine  
**Subject:** {BULK} RE: Pluris Wedgefield Audit

**Importance:** Low

Ana,  
I don't see it filed yet. Can you just email it to me so that I can get started on responses since the Thanksgiving holiday cuts into the response time?  
Thanks, Marty

**MARTIN S. FRIEDMAN**

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



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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]

**Sent:** Monday, November 19, 2012 3:16 PM

**To:** Martin Friedman

**Subject:** Pluris Wedgefield Audit

Hi Marty, I hope you are well.

The audit for Pluris should be filed with the Clerk's office today. We would really like to get a response back by December 7th to help keep our timeline on track. In your response please include (but not limited to) the specific job descriptions for both Lu Ann Danley and Cody Gallarda that are recorded in contractual services, the updated contract referenced in Audit Finding No. 4, and an updated Rate Case Expense breakdown.

Thanks and have a great day!

*Ana*

Mrs. Ana VanEsselstine



Regulatory Analyst II  
Division of Accounting and Finance

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

*Encls.*

Phone: (850) 413-6435

Fax: (850) 413-6436

*Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.*

## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Thursday, November 08, 2012 1:59 PM  
**To:** Ana VanEsselstine  
**Cc:** Bart Fletcher; Maurice Gallarda; Dan Winters  
**Subject:** {BULK} Pluris Wedgefield Rate Case/Docket No. 120152-WS  
**Attachments:** Wedgefield Property Tax Bills 2012.pdf

**Importance:** Low

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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Attorneys at Law  
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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Thursday, November 08, 2012 12:42 PM  
**To:** Ana VanEsselstine  
**Cc:** Dan Winters; Maurice Gallarda  
**Subject:** {BULK} Pluris Wedgefield rate case

**Importance:** Low

Ana,  
To facilitate the response to this Data Request can you email the letter in Word format?  
Thanks, Marty

**MARTIN S. FRIEDMAN**

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



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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Monday, October 08, 2012 11:57 AM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152  
**Attachments:** Synopsis v2.pdf; Combined Initial Customer and Customer Meeting Notice v2.pdf

**Importance:** Low

Ana,  
Attached are v2 of the Combined Customer Notice, and the Synopsis which incorporate the changes you requested. Please advise me if I missed any or if there are any additional changes.  
Thanks, Marty

**MARTIN S. FRIEDMAN**

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



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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Friday, October 05, 2012 2:12 PM  
**To:** Martin Friedman  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

Thanks Marty,

I have just a couple of minor changes that need to be made to both. For consistency sake, please change "Commission Staff" to "Commission staff" in both the notice and synopsis. "Staff" should always be lower case, unless beginning a sentence. Also, Page 6 of the synopsis the sentence at the bottom of the page describing the participants involved, can you indent that line? On page 9 you reference multiple locations where the MFRs are housed, but only list the library. Is there another location? In the customer notice, under the "Customer Meeting" section, can you change "Pluris Wedgefield, Inc. Application" to "Pluris Wedgefield, Inc.'s application?" Again, at the bottom of page 2, you reference multiple locations.

The only other thing that I would change is to add the Utility's business hours. Rule 25-22-.0407(5)(b)6. required "The utility's address, telephone number, and business hours". You can either add that information in the background section of page 2 or maybe at the end with the telephone number. Either way, I think we need to give a clearer way of contacting the utility.

The dates to send our the notice/synopsis are good and the other items that are scheduled are listed below.

**Schedule**

**Item**

**Due Date**

Staff Audit Report	&nbs p;	October 19, 2012
Customer Meeting	&nb sp;	December 5, 2012
Staff's Proposed Agency Action ("PAA") Recommendation	February 7, 2012	
Agenda Conference on PAA Rates	February 19, 2012	
PAA Order	&nbs p;	March 11, 201
Protest Period Expires	April 1, 2012	

Thanks and let me know if you have any questions.

Ana

---

**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]

**Sent:** Thursday, October 04, 2012 8:48 AM

**To:** Ana VanEsselstine

**Cc:** Maurice Gallarda; Bart Fletcher; Michael Lawson

**Subject:** {BULK} Pluris Wedgefield Rate Case/ Docket 120152

**Importance:** Low

Ana,

Attached are the Combined Customer Meeting and Initial Customer Notice, and the Synopsis. Once they have been approved I will format the rate tables so the notice flows better. Please verify the dates within which the Combined Notice should be mailed. I look forward to your comments.

Regards, Marty

&n bsp;

**MARTIN S. FRIEDMAN**

**SUNDSTROM,  
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Attorneys | Counselors



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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Wednesday, October 03, 2012 2:06 PM  
**To:** Martin Friedman  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

Hi Marty,  
The customer meeting for Pluris is set for Wednesday, December 5th at 6:00pm at the Wedgefield Country Club (20550 Maxim Parkway, Orlando, FL 32833). Please send in the combined notice as soon as possible.  
Thanks!  
Ana

---

**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Tuesday, October 02, 2012 8:46 AM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152  
**Importance:** Low

Ana,  
Will do. Do we have a customer meeting date? I want to see if we can send a combined initial notice and customer meeting notice, in stead of separate ones.  
Regards, Marty

< span style='font-family:"Georgia","serif";font-variant:small-caps;color:black'>Martin S. Friedman

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**F rom:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Tuesday, October 02, 2012 8:43 AM  
**To:** Martin Friedman  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

I am assuming those deficiencies will be corrected shortly. If you would like to, go ahead and send me the draft rate case synopsis and customer meeting notice and I will start reviewing them.

Thanks!  
Ana

## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Thursday, October 04, 2012 8:48 AM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda; Bart Fletcher; Michael Lawson  
**Subject:** {BULK} Pluris Wedgefield Rate Case/ Docket 120152  
**Attachments:** Synopsis.pdf; Combined Initial Customer and Customer Meeting Notice.pdf

**Importance:** Low

Ana,  
Attached are the Combined Customer Meeting and Initial Customer Notice, and the Synopsis. Once they have been approved I will format the rate tables so the notice flows better. Please verify the dates within which the Combined Notice should be mailed. I look forward to your comments.

Regards, Marty

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**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Wednesday, October 03, 2012 2:06 PM  
**To:** Martin Friedman  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

Hi Marty,  
The customer meeting for Pluris is set for Wednesday, December 5th at 6:00pm at the Wedgefield Country Club (20550 Maxim Parkway, Orlando, FL 32833). Please send in the combined notice as soon as possible.  
Thanks!  
Ana



**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Tuesday, October 02, 2012 8:46 AM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152  
**Importance:** Low

Ana,  
Will do. Do we have a customer meeting date? I want to see if we can send a combined initial notice and customer meeting notice, in stead of separate ones.  
Regards, Marty

< span style='font-family:"Georgia","serif";font-variant:small-caps;color:black'>Martin S. Friedman

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**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Tuesday, October 02, 2012 8:43 AM  
**To:** Martin Friedman  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

I am assuming those deficiencies will be correctly shortly. If you would like to. go ahead and send me the draft rate case synopsis and customer meeting notice and I will start reviewing them.

Thanks!  
Ana

## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Wednesday, October 03, 2012 4:05 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda; Bart Fletcher  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

**Importance:** Low

Ana,  
I assume the Country Club agreed not to serve alcohol?  
Marty

**MARTIN S. FRIEDMAN** </SPAN>

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



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---

**FROM:** ANA VANESSELSTINE [[MAILTO:AVANESSE@PSC.STATE.FL.US](mailto:AVANESSE@PSC.STATE.FL.US)]  
**SENT:** WEDNESDAY, OCTOBER 03, 2012 2:06 PM  
**TO:** MARTIN FRIEDMAN  
**CC:** MAURICE GALLARDA  
**SUBJECT:** RE: {BULK} PLURIS WEDGEFIELD RATE CASE/ DOCKET 120152

HI MARTY,  
THE CUSTOMER MEETING FOR PLURIS IS SET FOR WEDNESDAY, DECEMBER 5TH AT 6:00PM AT THE WEDGEFIELD COUNTRY CLUB (20550 MAXIM PARKWAY, ORLANDO, FL 32833). PLEASE SEND IN THE COMBINED NOTICE AS SOON AS POSSIBLE. < SPAN  
STYLE='FONT-SIZE:12.0PT;FONT-FAMILY:"MS PGOTHIC","SERIF"'>  
Thanks!  
Ana

---

**From:** Martin Friedman [[mailt o:MFriedman@sfflaw.com](mailto:MFriedman@sfflaw.com)]  
**Sent:** Tuesday, October 02, 2012 8:46 AM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda

**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

**Importance:** Low

Ana,

Will do. Do we have a customer meeting date? I want to see if we can send a combined initial notice and customer meeting notice, instead of separate ones.

Regards, Marty

< span style='font-family:"Georgia","serif";font-variant:small-caps;color:black'>Martin S. Friedman

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**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]

**Sent:** Tuesday, October 02, 2012 8:43 AM

**To:** Martin Friedman

**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

I am assuming those deficiencies will be correctly shortly. If you would like to, go ahead and send me the draft rate case synopsis and customer meeting notice and I will start reviewing them.

Thanks!

Ana

## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Tuesday, October 02, 2012 8:46 AM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

**Importance:** Low

Ana,  
Will do. Do we have a customer meeting date? I want to see if we can send a combined initial notice and customer meeting notice, instead of separate ones.  
Regards, Marty

< span style='font-family:"Georgia","serif";font-variant:small-caps;color:black'>Martin S. Friedman

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**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Tuesday, October 02, 2012 8:43 AM  
**To:** Martin Friedman  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

I am assuming those deficiencies will be correctly shortly. If you would like to, go ahead and send me the draft rate case synopsis and customer meeting notice and I will start reviewing them.

Thanks!  
Ana

## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Tuesday, October 02, 2012 8:39 AM  
**To:** Ana VanEsselstine  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

**Importance:** Low

Thank you again. I will file responses today and copy you.

### MARTIN S. FRIEDMAN

SUNDSTROM,  
FRIEDMAN & FUMERO, LLP  
Attorneys | Counselors



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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Tuesday, October 02, 2012 8:38 AM  
**To:** Martin Friedman  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

Sorry, habit.

Ana

---

**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Tuesday, October 02, 2012 8:29 AM  
**To:** Ana VanEsselstine  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152  
**Importance:** Low

Ana,

Can you email the 2d deficiency letter to me in Word?  
Thanks

MARTIN S. FRIEDMAN < /SPAN >

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---

**FROM:** ANA VANESSELSTINE [[MAILTO:AVANESSE@PSC.STATE.FL.US](mailto:AVANESSE@PSC.STATE.FL.US)]  
**SENT:** MONDAY, OCTOBER 01, 2012 2:24 PM  
**TO:** MARTIN FRIEDMAN; BART FLETCHER  
**CC:** MAURICE GALLARDA  
**SUBJECT:** RE: {BULK} PLURIS WEDGEFIELD RATE CASE/ DOCKET 120152

HI MARTY,  
< /SPAN >

PLEASE SEE THE ATTACHED. THE EXECUTED COPY IN THE MAIL. LET ME KNOW IF YOU NEED ANY ADDITIONAL INFORMATION.  
THANKS!  
ANA

---

**FROM:** MARTIN FRIEDMAN [[MAILTO:MFRIEDMAN@SFFLAW.COM](mailto:MFRIEDMAN@SFFLAW.COM)]  
**SENT:** MONDAY, OCTOBER 01, 2012 2:17 PM  
**TO:** BART FLETCHER; ANA VANESSELSTINE  
**CC:** MAURICE GALLARDA  
**SUBJECT:** {BULK} PLURIS WEDGEFIELD RATE CASE/ DOCKET 120152  
**IMPORTANCE:** LOW

BART OR ANA,

I NOTICED FROM THE CLERK'S DOCKET THAT THE STAFF ISSUED A LETTER TODAY THAT THE MFRs ARE STILL DEFICIENT, BUT THE ACTUAL LETTER IS NOT YET POSTED. CAN ONE OF YOU EMAIL ME A COPY? I AM WITH THAT CLIENT IN A HEARING IN SARASOTA AND WOULD LIKE TO BE ABLE TO GO OVER IT WITH HIM THIS AFTERNOON.

THANKS, MARTY

MARTIN S. FRIEDMAN

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



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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Tuesday, October 02, 2012 8:29 AM  
**To:** Ana VanEsselstine  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

**Importance:** Low

Ana,  
Can you email the 2d deficiency letter to me in Word?  
Thanks

**MARTIN S. FRIEDMAN** </SPAN>

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



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---

**FROM:** ANA VANESSELSTINE [[MAILTO:AVANESSE@PSC.STATE.FL.US](mailto:AVANESSE@PSC.STATE.FL.US)]  
**SENT:** MONDAY, OCTOBER 01, 2012 2:24 PM  
**TO:** MARTIN FRIEDMAN; BART FLETCHER  
**CC:** MAURICE GALLARDA  
**SUBJECT:** RE: {BULK} PLURIS WEDGEFIELD RATE CASE/ DOCKET 120152

HI MARTY,

PLEASE SEE THE ATTACHED. THE EXECUTED COPY IN THE MAIL. LET ME KNOW IF YOU NEED ANY ADDITIONAL INFORMATION.  
THANKS!  
ANA

---

**FROM:** MARTIN FRIEDMAN [[MAILTO:MFRIEDMAN@SFFLAW.COM](mailto:MFRIEDMAN@SFFLAW.COM)]  
**SENT:** MONDAY, OCTOBER 01, 2012 2:17 PM  
**TO:** BART FLETCHER; ANA VANESSELSTINE  
**CC:** MAURICE GALLARDA  
**SUBJECT:** {BULK} PLURIS WEDGEFIELD RATE CASE/ DOCKET 120152  
**IMPORTANCE:** LOW



BART OR ANA,

I NOTICED FROM THE CLERK'S DOCKET THAT THE STAFF ISSUED A LETTER TODAY THAT THE MFRS ARE STILL DEFICIENT, BUT THE ACTUAL LETTER IS NOT YET POSTED. CAN ONE OF YOU EMAIL ME A COPY? I AM WITH THAT CLIENT IN A HEARING IN SARASOTA AND WOULD LIKE TO BE ABLE TO GO OVER IT WITH HIM THIS AFTERNOON.

THANKS, MARTY

**MARTIN S. FRIEDMAN**

**SUNDSTROM,  
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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Monday, October 01, 2012 2:27 PM  
**To:** Ana VanEsselstine  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

**Importance:** Low

Thank you.

**MARTIN S. FRIEDMAN**

**SUNDSTROM,  
FRIEDMAN & FUMERO, LLP**  
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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Monday, October 01, 2012 2:24 PM  
**To:** Martin Friedman; Bart Fletcher  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152

Hi Marty,

Please see the attached. The executed copy in the mail. Let me know if you need any additional information.  
Thanks!  
Ana

---

**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Monday, October 01, 2012 2:17 PM  
**To:** Bart Fletcher; Ana VanEsselstine  
**Cc:** Maurice Gallarda

**Subject:** {BULK} Pluris Wedgefield Rate Case/ Docket 120152  
**Importance:** Low

Bart or Ana,

I noticed from the Clerk's Docket that the Staff issued a letter today that the MFRs are still deficient, but the actual letter is not yet posted. Can one of you email me a copy? I am with that client in a hearing in Sarasota and would like to be able to go over it with him this afternoon.

Thanks, Marty

**MARTIN S. FRIEDMAN**

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Monday, October 01, 2012 2:17 PM  
**To:** Bart Fletcher; Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** {BULK} Pluris Wedgefield Rate Case/ Docket 120152

**Importance:** Low

Bart or Ana,

I noticed from the Clerk's Docket that the Staff issued a letter today that the MFRs are still deficient, but the actual letter is not yet posted. Can one of you email me a copy? I am with that client in a hearing in Sarasota and would like to be able to go over it with him this afternoon.

Thanks, Marty

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Thursday, September 13, 2012 1:49 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** {BULK} Pluris Wedgefield Rate Case/ Docket 120152-WS  
**Attachments:** Tariff Sheets- Water Interim.pdf; Tariff Sheets - Wastewater Interim.pdf

**Importance:** Low

Ana,  
Utilities, Inc. operated the utility systems for Pluris for several months after closing and I understand that they filed an indexing based on the 2009 price index for Wedgefield, so I assumed there was a first revised tariff sheet. I'm not sure how that was handled since I was not involved, but I have revised the Tariff Sheets nonetheless. Let me know if you need anything else. Do you have any comments on the customer notice? Thanks for your diligence in reviewing this so quickly. See you Tuesday.

Regards, Marty

### MARTIN S. FRIEDMAN

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FRIEDMAN & FUMERO, LLP**  
Attorneys | Counselors



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---

**From:** Ana VanEsselstine [<mailto:AVanesse@psc.state.fl.us>]  
**Sent:** Thursday, September 13, 2012 11:03 AM  
**To:** Martin Friedman  
**Cc:** Maurice Gallarda  
**Subject:** RE: {BULK} Pluris Wedgefield Rate Case/ Docket 120152-WS

Hi Marty,

Of course, I can not submit the interim packet for review until after the vote on Tuesday, but I looked over the information provided and have just a couple of questions/items. It appears that your interim tariff sheets have "Second Revised," but the the tariffs I have are the "Original". Is there an outstanding "First Revised" out there or is this just a typo? If it is just a typo, please update both the water and wastewater tariffs to reflect "First Revised" revision level. Also, you can go ahead

and put October 1, 2012 as the effective date. After the vote, barring any unforeseen changes I will submit this packet for review on Tuesday.

Thanks!  
Ana

---

**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Tuesday, September 11, 2012 12:10 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** {BULK} Pluris Wedgefield Rate Case/ Docket 120152-WS  
**Importance:** Low

Ana,  
The Commission is scheduled to vote on interim rates for Pluris W edgefield at the September 18, 2012 Commission Conference. In preparation for the implementation of the interim rate increase effective October 1, 2012 I have attached the Revised Tariff Sheets, proposed Customer Notice and Surety Bond. Please provide me with your comments.

Regards, Marty

**MARTIN S. FRIEDMAN**

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## Ana VanEsselstine

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**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Tuesday, September 11, 2012 12:10 PM  
**To:** Ana VanEsselstine  
**Cc:** Maurice Gallarda  
**Subject:** {BULK} Pluris Wedgefield Rate Case/ Docket 120152-WS  
**Attachments:** Tariff Sheets - Wastewater Interim.pdf; Tariff Sheets- Water Interim.pdf; Interim Rate Bond (executed).pdf; Interim Rate Notice.pdf

**Importance:** Low

Ana,  
The Commission is scheduled to vote on interim rates for Pluris Wedgefield at the September 18, 2012 Commission Conference. In preparation for the implementation of the interim rate increase effective October 1, 2012 I have attached the Revised Tariff Sheets, proposed Customer Notice and Surety Bond. Please provide me with your comments.  
Regards, Marty

**MARTIN S. FRIEDMAN**

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Monday, September 10, 2012 5:09 PM  
**To:** Ana VanEsselstine  
**Subject:** {BULK} FW: Docket No. 120152-WS; Pluris Wedgefield, Inc. 2012 General Rate Increase Application  
**Attachments:** PSC Clerk 06 (Deficiency Responses).pdf  
**Importance:** Low

Ana,  
Don't know why you were left off of this.

**MARTIN S. FRIEDMAN**

**SUNDSTROM,  
FRIEDMAN & FUMERO, LLP**

Attorneys | Counselors



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---

**From:** Dana Rudolf  
**Sent:** Monday, September 10, 2012 4:59 PM  
**To:** 'filings@psc.state.fl.us'  
**Cc:** Martin Friedman; 'Maurice W. Gallarda ([mgallarda@plurisusa.com](mailto:mgallarda@plurisusa.com))'; Bart Fletcher ([BFletche@PSC.STATE.FL.US](mailto:BFletche@PSC.STATE.FL.US))  
**Subject:** Docket No. 120152-WS; Pluris Wedgefield, Inc. 2012 General Rate Increase Application

- a) &n bsp; Martin S. Friedman, Esquire  
Sundstrom, Friedman & Fumero, LLP  
766 North Sun Drive, Suite 4030  
Lake Mary, FL 32746  
(407) 830-6331  
[mfriedman@sfflaw.com](mailto:mfriedman@sfflaw.com)
- &nbs p;
- b) Docket No. 120152-WS  
Pluris Wedgefield, Inc. 2012 General Rate Increase Application



- c) Pluris Wedgefield, Inc.
- d) 88 pages
- e) Response to Staff's Deficiency letter.

## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Monday, September 10, 2012 7:54 AM  
**To:** Bart Fletcher  
**Cc:** Ana VanEsselstine; Andrew Maurey  
**Subject:** {BULK} RE: Pluris Wedgefield - Docket No. 120152-WS

**Importance:** Low

Thanks.

**MARTIN S. FRIEDMAN**

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---

**From:** Bart Fletcher [<mailto:BFletche@PSC.STATE.FL.US>]  
**Sent:** Monday, September 10, 2012 7:53 AM  
**To:** Martin Friedman  
**Cc:** Ana VanEsselstine; Andrew Maurey  
**Subject:** Pluris Wedgefield - Docket No. 120152-WS

Good morning, Marty.

Please see the attached Word file containing the deficiency letter for the above-referenced docket.

Thanks ,

*Bart Fletcher*

Public Utilities Supervisor  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-7017 (Phone)

(850) 413-7018 (Fax)  
[bart.fletcher@psc.state.fl.us](mailto:bart.fletcher@psc.state.fl.us)

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---

**From:** Martin Friedman [<mailto:MFriedman@sfflaw.com>]  
**Sent:** Friday, September 07, 2012 4:54 PM  
**To:** Bart Fletcher  
**Cc:** Ana VanEsselstine  
**Subject:** {BULK} Pluris Wedgefield  
**Importance:** Low

Bart,  
I'm preparing to respond to deficiency letter. Can you or Ana email it to me in Word? Thanks  
Marty

**MARTIN S. FRIEDMAN**

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Friday, September 07, 2012 4:54 PM  
**To:** Bart Fletcher  
**Cc:** Ana VanEsselstine  
**Subject:** {BULK} Pluris Wedgefield

**Importance:** Low

Bart,  
I'm preparing to respond to deficiency letter. Can you or Ana email it to me in Word? Thanks  
Marty

**MARTIN S. FRIEDMAN**

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## Ana VanEsselstine

---

**From:** Martin Friedman <MFriedman@sfflaw.com>  
**Sent:** Tuesday, September 04, 2012 1:20 PM  
**To:** Ana VanEsselstine  
**Subject:** {BULK} Pluris Wedgefield

**Importance:** Low

Ana,  
To facilitate the Utility's response to Staff's 1<sup>st</sup> data request could you email me the data request in Word format?  
Thanks, Marty

**MARTIN S. FRIEDMAN**

**SUNDSTROM,  
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