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Public Service Commission

January 23, 2018

Mr. Martin S. Friedman, Esquire
Friedman & Friedman, P .A.
766 N. Sun Drive, Ste. 4030
Lake Mary, FL 32746
mfriedman@ff-attomeys.com

STAFF'S SECOND DATA REQUEST
via email

Re: Docket No. 20170166-WS - Application for limited proceeding rate increase in Orange County by Pluris Wedgefield, Inc.

Dear Mr. Friedman:

By this letter, the Commission staff requests that Pluris Wedgefield, Inc. (Pluris Wedgefield or Utility) provide responses to the following data requests.

Legal Fees

Please refer to Pluris Wedgefield's petition for limited proceeding, document no. 06333-2017.

- 1) Please provide all invoices related to the \$39,960 for legal fees on Schedule 12.
- 2) Please provide the reasoning or justification for the following costs on Schedule 12:
 - a. \$1000 Hotel, Airfare
 - b. \$400 Travel, Hotel
 - c. \$300 Travel, Auto
 - d. \$300 Travel, Meals

Tax Reform

Please refer to Pluris Wedgefield's petition for limited proceeding, document no. 06333-2017.

- 3) Please provide a revised Schedule No. 3 reflecting the new Federal Income Tax rate and revenue requirement.
- 4) Please provide revised Schedule Nos. 1 and 13 reflecting the new revenue requirement and rates as a result of the new Federal income Tax rate.

AMI Meters

Please refer to Pluris Wedgefield's petition for limited proceeding, document no. 06333-2017.

- 5) On page 2, Pluris Wedgefield reported that customers had concerns of misread meters and estimates were a constant issue.
 - a. For the period of January 1, 2013 to September 30, 2016, how many customer accounts per month were estimated?
 - b. For the period of October 1, 2016 to the present, how many customer accounts per month were estimated?
 - c. For the period of January 1, 2013 to September 30, 2016, how many customer complaints did the Utility receive concerning billing issues?
 - d. Are these complaints included in the complaints that were provided with the petition? If not, please provide a copy of the billing issue complaints.
 - e. For the period of October 1, 2016 to the present, how many customer complaints did the Utility receive concerning billing issues? Please provide a copy of those complaints.
- 6) On page 2, Pluris Wegefild reported that it also implemented a customer portal. Has the Utility received any feedback on the customer portal? If so, please provide descriptions of the type of feedback from customers using the portal.
- 7) Please provide the installation dates of the old meters.
- 8) On Schedule 7, the Utility provide \$224,489 for meter retirements. Please explain how Pluris Wedgefield determined this amount for the retirement of the meters.

Please refer to Pluris Wedgefield's response to staff's first data request, document no. 10796-2017.

- 9) Invoice number 31, from HD Supply, for \$3,098.09, shows a product code of 3707B43332WNL, with a description of B43-332WNL ¾ BMV PJ(CTS)XMN (No Lead) for a quantity of 50 at \$57.52 each. What is this item and how does it relate to the AMI meters?
- 10) Invoice number 32, from HD Supply, for \$924.95, shows a product code of 3910C4444NL, with a description of C44-44NL 1" No Lead CPLG PJCTS for a quantity of 25 at \$17.43 each. What is this item and how does it relate to the AMI meters?
- 11) Invoice number 32, from HD Supply, for \$924.95, shows a product code of 3907C4433NL, with a description of C44-33NL ¾" No Lead CPLG PJCTS for a quantity of 25 at \$15.23 each. What is this item and how does it relate to the AMI meters?
- 12) Invoice number 43, from HD Supply, for \$174.87, shows a product code of 391007U4843NL, with a description of U48-43NL 1X3/4X7 ½ U-BR CMPX MIP (No Lead) for a quantity of 1 at \$42.20 each. What is this item and how does it relate to the AMI meters?

- 13) Invoice number 43, from HD Supply, for \$174.87, shows a product code of 3707BA13332WNL, with a description of BA 13-332WNL 5/8X3/4 ANG BMV FX MN (No Lead) for a quantity of 2 at \$61.00 each. What is this item and how does it relate to the AMI meters?
- 14) Invoice number 45, from HD Supply, for \$616.50, shows a product code of 3707B13332WNL, with a description of B13-332W-NL ¾ Ball MV FIPXMN w/Lock Wing No Lead for a quantity of 4 at \$54.15 each. What is this item and how does it relate to the AMI meters?
- 15) Please refer to invoice numbers 50, 56, and 63. Please explain why Pluris is capitalizing labor when it appears Utility Solutions (invoices numbers 26, 28, 33, 36, and 42) provided labor to install the meters.
- 16) Please refer to invoice numbers 53 and 58. Please describe the engineering service that Professional Service (invoice 53) provided and explain how it is different from the work performed by HD Supply (invoice 58).

Water Softener

Please refer to Pluris Wedgefield's petition for limited proceeding, document no. 06333-2017.

- 17) On page 3, Pluris Wedgefield reported that customers had concerns of scaling on home piping and hard water spots after washing dishes.
 - a. For the period of January 1, 2013 to February 29, 2016, how many customer complaints did the Utility receive concerning the hard water issues?
 - b. Are these complaints included in the complaints that were provided with the petition? If not, please provide a copy of the hard water issues complaints.
 - c. For the period of March 1, 2016 to the present, how many customer complaints did the Utility receive concerning hard water issues? Please provide a copy of those complaints.
 - d.
- 18) Schedule 6 shows additions to account 304 for a new structure for this project. However, on Schedule 7, the Utility only identified \$248,850 for water softener equipment retirements in account 320.3. Were there any retirements associated with the additions to account 304? If no, please explain your answer.

Please refer to Pluris Wedgefield's response to staff's first data request, document no. 10796-2017.

- 19) Please refer to invoice numbers 1 and 2. Invoice number 1 appears to be a contract and not an invoice and the price included is for a down payment.
 - a. Why was only the down payment included in the price for this project?
 - b. What is the difference between invoice numbers 1 and 2?

- 20) Please refer to invoice numbers 1 through 5. Please explain the difference between the carport and the shade structure.

Office Building

Please refer to Pluris Wedgefield's petition for limited proceeding, document no. 06333-2017.

- 21) On page 3, Pluris Wedgefield stated that an existing electrical building was being used for staff to conduct daily work.
- a. Does the Utility have any pictures of the electrical building that was being used? If so, please provide them.
 - b. Please explain what type of work the staff will be doing on a daily basis.
 - c. Is lab work part of the daily work?
 - d. What kind of equipment (lab table, lab equipment, computers) is needed to complete the daily work?
 - e. Will the new office building house extra equipment and testing equipment?
- 22) On schedule 6, Pluris Wedgefield included \$2,220 for account 311.3 and \$14,214 for account 320.3. Please explain why those amounts were included in those account and not in account 304.

Please refer to Pluris Wedgefield's response to staff's first data request, document no. 10796-2017.

- 23) Please refer to invoice number 10 from Kimley Horn. The line item include for this project has a description of Site Permitting for Office and Maxim Break for \$3,282.
- a. Please explain what the Maxim Break was and why it is included in this project?
 - b. What was the cost for the site permitting for the office?

24) Please complete the table below summarizing Pluris' projects.

| Project | Total Number of Bids Received | Three Lowest Bids | Bid Selected Company/Amount |
|-----------------------------|--------------------------------------|--------------------------|------------------------------------|
| AMI Water Meters | | | |
| Wastewater Main Replacement | | | |
| Maintenance Building | | | |
| Water Softening Equipment | | | |

Mr. Martin S. Friedman, Esquire

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Please file all responses electronically no later than Friday, February 2, 2018, from the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6856 if you have any questions.

Sincerely,

/s/ Danijela Janjic

Danijela Janjic
Senior Attorney

DJ/as

cc: Office of Commission Clerk
Office of Public Counsel (Kelly, Ponder)