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VIA: ELECTRONIC FILING

Adam Teitzman
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No. 20230083-WS – Application for Increase in Water and Wastewater Rates
in Orange County by Pluris Wedgefield, LLC.**

On September 22, 2023, Pluris Wedgefield, LLC (Pluris or Utility) filed the minimum filling requirements (MFRs) for the above-referenced docket. By letter dated October 19, 2023, Commission staff found several deficiencies to the MFRs. By letter dated October 20, 2023, OPC submitted additional MFR deficiencies for consideration. By letter dated October 23, 2023, OPC submitted additional MFR deficiencies for consideration. While reviewing the Utility's interim request, OPC identified additional MFR deficiencies that are material in nature. OPC respectfully submits additional MFR deficiencies, discussed below, for consideration.

Rule 25-30.436(5)(g), Florida Administrative Code, states:

(g) Any system that has costs allocated or charged to it from a parent, affiliate or related party, in addition to those costs reported on Schedule B-12 of Commission Form PSC 1028 (12/20) for a Class A utility PSC 1029 (12/20) for a Class B utility, or PSC 1030 (12/20) for a Class C utility, which are incorporated by reference in

Rule 25-30.437, F.A.C., must e-file additional schedules that show the following information:

1. The total costs being allocated or charged prior to any allocation or charging as well as the name of the entity from which the costs are being allocated or charged and its relationship to the utility.
2. For costs allocated or charged to the utility in excess of one percent of test year revenues:
 - a. A detailed description and itemization; and,
 - b. The amount of each itemized cost.
3. The allocation or direct charging method used and the bases for using that method.
4. The workpapers used to develop the allocation method, including but not limited to the numerator and denominator of each allocation factor.
5. The workpapers used to develop, where applicable, the basis for the direct charging method.
6. An organizational chart of the relationship between the utility and its parent and affiliated companies and the relationship of any related parties.
7. A copy of any contracts or agreements between the utility and its parent or affiliated companies for services rendered between or among them.

In Pluris' last rate case, the Utility complied the above-referenced rule requirements through its submission of MFR Schedules G-1 through G-7,¹ as well as its response to MFR deficiencies identified by Commission staff in that prior case.² OPC respectfully submits that the absence of these schedules is a material deficiency that directly impacts the requested interim rates and must be cured before interim rates can be determined.

Respectfully submitted,

Bart Fletcher

Bart Fletcher
Legislative Analyst

¹ See Document No. 04836-2012.

² See Document No. 06100-2012.