

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water and  
wastewater rates in Orange County by  
Pluris Wedgefield, LLC

Docket No. 20230083-WS

**PLURIS WEDGEFIELD, LLC'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Pluris Wedgefield, LLC (“Utility”), by and through its undersigned counsel, and pursuant to Section 367.156, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, files this Request for Confidential Classification in relation to certain documents responsive to Staff’s First Data Request #2b in the above-referenced Docket.

1. Pursuant to 367.156, Florida Statutes, this Commission has the authority to classify certain material as proprietary confidential business information. This classification exempts the material from public disclosure under Section 119.07(1), Florida Statutes.

2. The Utility requests that employee salary information provided to the Staff in response to Staff’s First Data Request in the above-referenced Docket be classified as proprietary confidential business information under Section 367.156(2), Florida Statutes, and Rule 25-22.006, Florida Administrative Code (“Confidential Information”). If this request is granted, then the subject portions of the documents produced will be exempt from Section 119.07(1), Florida Statutes. Attached hereto as Exhibit “A” is a Justification Matrix providing a justification for the Utility’s request. The information is attached hereto in redacted format. A copy of this Request with the information in redacted format, and in separate envelope in highlighted format will be sent to the Commission Clerk.

3. Staff in its First Data Request #2b, has requested that the Utility provide annual salary information for the test year. The Utility treats employee salary information as strictly confidential.

This information should be classified as proprietary confidential business information because its disclosure would impair the Utility's competitive interests, provide other utility companies information to lure employees away (thereby driving up salaries and rates), and create circumstances under which infighting and employee morale could be negatively affected. See, *Florida Power & Light Company et al. v. Public Service Commission*, 31 So. 3d 860 (Fla. 1st DCA 2010). Further, requiring the disclosure of each employee's compensation information violates each employee's right to privacy under Article I, Section 23 of the Florida Constitution.

WHEREFORE, Pluris Wedgefield, LLC requests this Commission enter an order treating the information identified in this Request as confidential and exempt from disclosure.

Respectfully submitted this 3<sup>rd</sup> day of November, 2023  
by:

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For the Firm

**Exhibit “A”  
JUSTIFICATION MATRIX**

Location (Document name and location of information)	Justification
<p><b><u>Pluris Wedgefield Employees</u></b></p> <p>The salary amounts listed in the Column Labeled “2022 Comp.”</p>	<p>§367.156(3)(d) Disclosure of salary data would impair the ability of the Utility to contract for employees on favorable terms.</p> <p>§367.156(3)(e) Disclosure of the compensation data would impair the Utility’s competitive interests as described in <u>Florida Power &amp; Light Company et al. v. Public Service Commission</u>, 31 So. 3d 860 (Fla. 1st DCA 2010). The Utility keeps this information strictly confidential to prevent other utilities from stealing their employees and to prevent lowered morale and infighting among employees who have the same position but varying wages.</p> <p>Article I, Section 23 of the Florida Constitution. Disclosure of the information would invade the privacy rights of the employee.</p>

**Pluris Wedgefield Employees**

Employee	Title	Description of Work	Certificates / License	2022 Comp
Joe Kuhns	Regional Manager	Responsible for budget and implementation. Guide, train and manage lower-level management and supervisors. Prepare performance reports, staffing, profit, performance and other operations. Uphold company standards of excellence and service, guaranteeing quality performance. Overseeing daily compliance operations, managing budgets, and setting performance objectives. Recruiting, training, and supporting project managers and staff. Planning, evaluating, and optimizing operations to be efficient and cost-effective. Dealing with escalated customer issues, incident reports, and legal actions.	WW - B-7207 W - C-6754	\$ [REDACTED]
Garth Armstrong	Senior Project Manager	Develop project plans that identify resource and budgetary needs. Conduct project meetings at least once a week with staff. Provide feedback, advice, project updates and encouragement to staff. Manage deadlines and push staff to ensure timeliness. Coordinate with vendors and suppliers as needed. Provide on-site leadership for staff by building and motivating staff members to meet project goals, adhering to their responsibilities and project milestones.	WW - B-9532 W - C-12703	\$ [REDACTED]
Bill Trendel	Project Manager	Determine and define project scope and objectives. Develop and manage a detailed project schedule and work plan. Provide on-site leadership for staff by building and motivating staff members to meet project goals, adhering to their responsibilities and project milestones. Ensures compliance operations. Works closely with Customer Service office and coordinates customer interactions. Oversee work orders.	WW - A-9184 W - C-6411	\$ [REDACTED]
Roger Holsapple	W & WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-8863 W - C-7436	\$ [REDACTED]
Josue Rolon	WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-26749	\$ [REDACTED] Started Sep 2022
Kenny Mendez	W & WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-15817 W - B-18413	\$ [REDACTED] Terminated Apr 2023
Mike Jones	W & WW Trainee	Works with Project Manager to learn compliance operations. Conducts customer interactions. Conducts work orders.	Trainee	\$ [REDACTED] Resigned Jun 2023
Greg Peck	W & WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-13426 W - C-15164	Terminated 11-10-2021
James Carroll	W & WW Operator	Works with Project Manager to ensure compliance operations. Conducts customer interactions. Conducts work orders.	WW - C-15920 W - C-8494	Resigned 8-10-2021
Dylan Brown	W & WW Trainee	Works with Project Manager to learn compliance operations. Conducts customer interactions. Conducts work orders.	Trainee	Resigned 8-25-2021

We allocate costs 50/50 between water and wastewater expense accounts. For any capitalized labor, we allocate those costs to the appropriate capital accounts based on the hours spent on the project and use an average employee rate including payroll taxes and benefits.