

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 RESPONSE TO OFFICE OF PUBLIC COUNSEL'S  
REQUEST FOR ORAL ARGUMENT ON ITS MOTION FOR RECONSIDERATION OF  
ORDER GRANTING INTERIM RATES

Pluris Wedgefield, LLC. ("Pluris"), by and through its undersigned attorneys and pursuant to Rule 25-22.0022, Florida Administrative Code, files this response to Office of Public Counsel's Request for Oral Argument on its Motion to for Reconsideration of Order Granting Interim Rates [Document #00116-2024], and states:

OPC made three Docket filings prior to the December 5, 2023, Commission Conference espousing its position, and was given the unprecedented opportunity to argue its position at the Commission Conference and was even given a follow-up opportunity to present its argument. In its Motion for Reconsideration, it regurgitates those arguments.

OPC argues that oral argument would provide it with an opportunity to "further elaborate on the arguments made in the motion". It made thirteen pages of argument in its motion, and the purpose of oral argument is not to allow a party to "elaborate" on its motion. The motion should have fully and completely included OPC's position.

OPC argues that oral argument would "aid the Commissioners in understanding and evaluating the issues raised in the motion". The Commission devoted over an hour and a half to this matter, which is unprecedented in considering an interim rate request, which reflects that the Commissioners fully understood the issues. OPC made the same arguments at the Commission Conference that its has raised in its motion, so there would be nothing to be gained from further oral argument.

OPC argues that oral argument would "provide an opportunity for Citizens to answer any questions that Commissioners may have regarding the Motion". OPC made the arguments at the Commission Conference (and three times previously in writing) that it made in the Motion and the Commissioners engaged OPC, Staff and the Pluris at that time in addressing their questions.

Finally, OPC believes that ten minutes is sufficient time to present its argument. Interestingly, OPC says in its Motion that it was not given sufficient time at the Commission Conference within which to make its argument. OPC was given almost twenty minutes at the Commission Conference within which to make its argument, which it says was

not enough time, but now believes that ten minutes is sufficient. OPC has already been afforded twice as much time as it says it needs within which to make its argument, and any further argument will be duplicative.

WHEREFORE, Pluris Wedgefield, LLC, requests that this Commission enter an Order denying the Request for Oral Argument filed by Office of Public Counsel [Document #00116-2024].

Respectfully submitted this 16<sup>th</sup> day of January, 2024,  
by:

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/s/Martin S. Friedman  
MARTIN S. FRIEDMAN

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-mail to the following parties this 16<sup>th</sup> day of January 2024:

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/s/ Martin S. Friedman  
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