



KATHLEEN PASSIDOMO
President of the Senate

STATE OF FLORIDA
OFFICE OF PUBLIC COUNSEL

c/o THE FLORIDA LEGISLATURE
111 WEST MADISON ST.
ROOM 812
TALLAHASSEE, FLORIDA 32399-1400
850-488-9330

EMAIL: OPC_WEBSITE@LEG.STATE.FL.US
WWW.FLORIDAOPC.GOV



PAUL RENNER
*Speaker of the House of
Representatives*

February 23, 2024

VIA: ELECTRONIC FILING

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

Docket No. 20230083-WS – Application for Increase in Water and Wastewater Rates in Orange County by Pluris Wedgefield, LLC. (Utility)

Dear Mr. Teitzman:

To follow-up on a discussion earlier this week with someone with the Office of Primary Responsibility within Commission staff on this case, the intent of this letter is to make two corrections to the Office of Public Counsel’s (OPC) letter of concerns dated February 16, 2024. Upon further review of the Utility’s responses to the OPC’s Second Set of Interrogatories, the previous \$5,929,608¹ amount for “2015 Unappropriated Retained Earnings Including Impact of Merger” was erroneous and significantly overstated. Further, in order to be consistent with the statement reflected in footnote 2 on page 4 of the February 16, 2024 letter, the “Funding Reconciliation of Gross Utility Plant Investment” table reflected on pages 6 and 7 of that letter should be corrected and replaced with the following table.

Funding Reconciliation of Utility Plant In Service Investment ²	
2022 Year-End Utility Plant In Service	\$21,515,348
2020-2022 Lawsuit Costs of \$6,281,931 Less 2022 Other Equity Capital of \$7,871,476	(1,589,545)
2022 Year-End CIAC	(7,358,730)
2009 Common Stock Issued	(1,000)
2015 Incremental Common Stock Issued	(1,000)
2015 Other Paid in Capital	(4,153,190)

¹ This amount was erroneously pulled from Schedule F-22 of the Utility’s 2015 Annual Report, rather than Schedule F-16 reflecting the correct amount of \$3,411,522.

² Source: MFR Schedules A-18, A-19, D-2, & D-5; Utility’s 2009-2022 Annual Reports; Utility’s Responses to OPC’s Second Set of Interrogatories.

2015 Unappropriated Retained Earnings	(3,411,522)
2010 Advances from Associated Companies	(250,000)
2016 Long-Term Debt Issuance	(1,100,000)
2020 Long-Term Debt Issuance	(4,250,000)
Total Net Excess Funding Amount	<u>(\$599,639)</u>

Secondly, under the Normalization Adjustments O&M Expenses Section on page 21 of that letter, the “\$4,417” amount should be changed to \$2,417. With the exception of these corrections, the OPC stands by its letter dated February 16, 2024.

Respectfully submitted,

Bart Fletcher

Bart Fletcher
Legislative Analyst

CC: Parties of Record