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April 15th, 2018

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: PSC Document No. 02797-2018 (filed 06APR2018)

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

Distro:

PSC Chairman Art Graham
Commissioner Julie I. Brown
Commissioner Donald J. Polmann
Commissioner Gary F. Clark
Commissioner Andrew G. Fay
Executive Director Braulio L. Baez
Inspector General Steven J. Stolting

Governor Rick Scott
FL State Senator Linda Stewart - District 13
FL State Representative Rene Plasencia - District 50
US Representative Bill Posey - District 8
US Senator Bill Nelson
US Senator Marco Rubio

Dear Sir or Madam:

This letter is to formally protest the proposed rate increase requested by Pluris, a private utility located in Wedgefield located in unincorporated East Orange County, Florida and recommended approved (with decrements) from your staff. Reading through the recommendation, there are numerous inconsistencies from Pluris that your staff found and reduced in its recommendations. I appreciate their thoroughness in this regard, but must say I am concerned that Pluris misled the commission to begin with by falsifying their requests and misrepresenting costs incurred when their customers have seen none of the benefits they are stating. I also believe the current grossly overcharging of water was not taken into account when your staff recommended the approval of the adjusted rate increase.

1) **FALSE INFORMATION:** Advanced Metering Infrastructure (AMI) meters. These meters were installed due to numerous complaints of false readings, faulty and/or un-calibrated meters that resulted in numerous residents being grossly overcharged for water they did not use. When Pluris stated they would be installing the new meters, residents were told there would be no additional costs placed on customers for this "upgrade." We were told this improvement would be more accurate and better for customers. This is obviously false if they are now asking for cost recovery of these meters two years after installation. Since installation, I have heard multiple complaints from residents who have stated they have had huge bills from Pluris after leaving on vacation for several weeks with no justification for the large bills other than Pluris stating, "you must have a leak." Also, I have read complaints of the new meters no longer sending data so Pluris "estimates" resident usage and severely overcharges for unsubstantiated usage without investigating or repairing meters that are no longer sending data, that is, until a customer asks questions about higher than normal bills. Further, in their request, Pluris asked for cost recovery of cell tower rentals, which they stated was "no longer needed" when pressed by your staff. This resulted in a staff decrement. Had your staff not been as thorough as they were, Pluris would have been granted and would have "recovered" costs they did not incur. This is noted multiple times throughout the recommendation. As a customer of Pluris, I have come to understand that everything they say is not true and this latest filing only reinforces that belief. As a privately owned utility, their entire goal is profit and, as they have shown since taking over, not the welfare of its residents. The PSC is supposed to have in mind the welfare of residents as their goal when making their decisions.

2) **PLURIS COST RECOVERY:** Pluris is asking for cost recovery for installation of a water softener. If they had purchased and installed a water softening system, I would not have had to have pay over \$5,000 for a system to soften the water coming from Pluris to include additional filtration. Since their alleged install, I have had to replace two (2) water heaters, all of the hose bibs, water faucets, both toilets and the showerheads (every six months) due to calcium buildup. To

date I still will not drink, nor allow my family or pets to drink, the water they provide. In their request, Pluris overstated (a euphemism for falsified) the Utility President's travel and expenses, which your staff reduced after asking for receipts that failed to prove their original request amounts. Pluris is asking for reimbursement for mailings and notices that I nor any of my neighbors have received. We usually don't know about boil notices or other issues with the water for more than a week after each incident and only then because someone read about it on Social Media and not because of notices from Pluris. The only mailings we regularly receive from Pluris are bills.

3) **RESIDENT STRUGGLES:** The recommendation also states there have been very few complaints about the utility. However, it only refers to complaints the PSC has received. I have become aware that most of the residents are unaware of the PSC complaint process and did not file those complaints with the commission. However, residents have complained to Pluris directly, most of which are not recorded, as well as filing complaints to FDEP and filing complaints with Orange County Mayor Theresa Jacobs and Orange County District 5 Commissioner Ted Edwards. Both of which proved to be ineffective regarding anything involving our community. In the last general election, in January of 2017, Emily Bonilla defeated incumbent Ted Edwards. Her major campaign platform included environmental protection for East Orange County and her promise to us directly was to fix Wedgefield water if elected. She has been non-existent in our community since getting elected well over a year ago. Additionally, the Orlando local media, both print and television news, have had numerous reports of residents being unsatisfied with the utilityⁱⁱⁱ. Two weeks after the FDEP report came out stating was within state guidelines, residents contacted Orange County Environmental Protection Division (OCEPD) and paid to have Pluris water privately tested. Their results disagreed with FDEP records stating water was unsafe and water did not meet state guidelines. FDEP later stated they did not do their own testing, and only reviewed the test results that Pluris was providing and used that data to release their report. This resulted a vote of no confidence with Pluris or FDEP and ultimately in a petition with Orange County to have their municipal utility, Orange County Utilities (OCU) take over the utility. As of today, most of the residents have signed this petition. To date, Orange County Commissioners have failed to act and has continually stated they have no control over Pluris quality or pricing. We were told that if the petition were to meet its required goals, and if Pluris were willing to sell the utility, then the burden of the costs to purchase (in millions of dollars) would fall to the residents in the form of an increase of water rates. Essentially, 1,600 residents would be required to pay for the utility over the course of the next 20 years but it would still belong to OCU. Orange County government has proven itself impotent and FDEP unreliable and incompetent at protecting citizen. Residents are being held hostage by a water utility, and your staff did not include any of these facts in their recommendation.

4) **CURRENT AND PROPOSED RATES:** Nothing in your Staff's recommendation for the rate increase was mentioned regarding the current extraordinarily high costs that Pluris, a private utility, is currently charging for their "service." There should be some sort of cap or limit on how much a private utility can charge for basic needs utilities. Comparing current Pluris rates and your staff's new proposed rates with municipal utilities in major urban areas in the state, I have learned that Pluris is charging almost seven (7) times what Orange County Utilities charge their customer and over fifteen (15) times what Miami-Dade charges their customers for water volume (per 1,000 gallons). **If you approve the rate increase, Pluris will be charging almost eight (8) times what OCU charges and almost eighteen (18) times what Miami-Dade charges!!** (See tables below) Note: Pluris data is taken from Schedule 3 and 4 of your staff's recommendation.

Pluris Current Rates					
	Orange County*	Miami-Dade County*	Pluris Current Rates	Pluris Current Rates Vs. Orange	Pluris Current Rates Vs. Miami-Dade
Water Base (5/8"x3/4" meter)	\$7.13	\$3.20	\$25.71	361% (3.61x)	803% (8.03x)
Water Volume (Per 1,000 gal)	\$1.13	\$0.50	\$7.79	689% (6.89x)	1,558% (15.58x)
Wastewater Base	\$16.67	\$3.25	\$29.01	174% (1.74x)	893% (8.93x)
Wastewater Volume (Per 1,000 gal)	\$3.79	\$1.85	\$4.24	112% (1.12x)	229% (2.29x)

Pluris Proposed Rates					
	Orange County*	Miami-Dade County**	Pluris Proposed	Pluris Proposed Rates Vs. Orange	Pluris Proposed Rates Vs. Miami-Dade
Water Base (5/8"x3/4" meter)	\$7.13	\$3.20	\$27.71	389% (3.89x)	866% (8.66x)
Water Volume (Per 1,000 gal)	\$1.13	\$0.50	\$8.74	773% (7.73x)	1,748% (17.48x)
Wastewater Base	\$16.67	\$3.25	\$30.61	184% (1.84x)	942% (9.42x)
Wastewater Volume (Per 1,000 gal)	\$3.79	\$1.85	\$4.47	118% (1.18x)	242% (2.42x)

*Orange County Water/Wastewater Rates Source

<https://www.orangecountyfl.net/Portals/0/Library/Water-Garbage-Recycle/docsWaterWastewaterReclaimedWaterRates.pdf>

**Miami-Dade Water/Wastewater Rates Source

<https://www.miamidade.gov/water/library/fees/rate-schedule-2017-18.pdf>

5) **RESIDENTIAL MONTHLY COST:** Using the information in the tables above from Schedule 3 and 4, I extrapolated what residents are paying and will pay by comparing that data with the typical rates from Orange and Miami-Dade counties. See Table below. Please note: This information is misleading as well, since I only use Pluris water for laundry and showers and my average bill over the past five (5) years is over \$150 per month. These costs, plus the bottled water and drinking water I purchase along with my house water treatment system make my water costs the highest in the country.

Typical Residential 5/8" x 3/4" Meter Bill Comparison***

	Pluris Water		Pluris Wastewater		Pluris Total		Current Orange compare	Proposed Orange compare	Current Miami compare	Proposed Miami compare
	Current	Proposed	Current	Proposed	Current	Proposed				
3,000 Gallons	\$48.08	\$53.93	\$41.73	\$44.02	\$89.81	\$97.95	232.91% (2.3x)	254.02% (2.5x)	916.43% (9.2x)	999.49% (10x)
5,000 Gallons	\$63.66	\$71.41	\$50.21	\$52.96	\$113.87	\$124.37	230.93% (2.3x)	252.22% (2.5x)	305.32% (3.0x)	333.47% (3.3x)
8,000 Gallons	\$92.70	\$103.99	\$62.93	\$66.37	\$155.63	\$170.36	233.68% (2.3x)	255.80% (2.6x)	277.06% (2.8x)	303.28% (3.0x)

*** Information taken from PSC Document No. 02797-2018 re: Docket No. 20170166-WS-Application for limited proceeding rate increase in Orange County by Pluris Wedgefield, Inc., Schedule 3 (pg.22) and Schedule 4 (Pg. 24)

Additionally, I personally know of numerous complaints regarding Pluris through Social Media, where customers have had serious issues with the water and we have seen no improvements, only empty promises. Per your staff's recommendation, only 18 complaints have been filed against Pluris. As previously stated, these are direct complaints to the PSC and do not include complaints made directly to Pluris, FDEP or to Orange County. Nor do they include the allegations of submitting false water quality reports by Pluris to FDEP and FDEP not verifying the information with independent testing. There are numerous complaints on Social Media that also illustrate problems with the utility including, and not limited to: Pluris water is undrinkable water to the extent of drinking/cooking with only bottled water, bleaching of clothing^[2], slimy residue coming from faucets^[2], blue color in water^[2], unable to wash vehicles due to calcium deposits, inability to water plants without damage, extreme chlorine smell, water plant dumping water into the park^[2], pets getting sick, human health problems, extremely hard water ruining plumbing and water heaters, numerous waterline and sewer breaks, unexplained losses of service, late notification of boil notices, and low water pressure. Personally, I have experience with most of these complaints and have resorted to adding additional carbon and particulate filters to my house in an attempt to get something close to resembling livable water. For your awareness, and to show the extremely low quality of water Pluris provides us, I have included some of the photographs^[2] I have taken, as well a few from other residents who posted them on Social Media about Pluris. These are located below.^[2]

In closing, I urge you to please reconsider raising rates for a private utility that seems to find itself above reproach for the basic quality of life services it is supposed to be providing to its customers and residents. I would like to see a complete investigation into these matters and into Pluris, the for-profit and unscrupulous private utility, to determine if: 1) Their current rates are reasonable and in line with other municipal utilities. 2) They are in true compliance, and 3) Whether or not there is any action that can reduce the current costs and/or improve the quality. For the record, it is against codes and covenants for resident in the Wedgefield city area to drill his or her own well and we have no choice in switching to a different water utility. With the exception of the agricultural acreage properties, known as "Wedgefield Estates" on the south end of Wedgefield, Pluris has a monopoly on all residents in Wedgefield and we can no longer go on accepting rate hikes, paying the highest rates for water/wastewater service in the state and living with water that no one is willing to drink. Per the PSC website, your mandate is repeated here as a reminder to your responsibility. *"The Florida Public Service Commission is committed to making sure that Florida's consumers receive some of their most essential services – electric, natural gas, telephone, water, and wastewater – in a safe, reasonable, and reliable manner. In doing so, the PSC exercises regulatory authority over utilities in one or more of three key areas: rate base/economic regulation; competitive market oversight; and monitoring of safety, reliability, and service."* You, the PSC, are our only recourse and I look forward very closely to your decision in this matter.

Sincerely,



Robert J. Hoppe

A Very Concerned Wedgefield Resident

Citations follow on next page:

[1] Pluris Water in the media:

- Tainted water samples prompt study of Wedgefield water - April 27, 2016
<http://www.orlandosentinel.com/news/politics/os-wedgefield-pluris-water-tests-20160427-story.html>
- Wedgefield water worries prompt county proposal to take over utility - November 18, 2016
<http://www.orlandosentinel.com/news/orange/os-wedgefield-fights-pluris-water-20161117-story.html>
- Wedgefield water takeover could take lots of time, money - January 24, 2017
<http://www.orlandosentinel.com/news/orange/os-wedgefield-pluris-orange-takeover-20170124-story.html>
- Wedgefield residents say water is bleaching their laundry - September 22, 2017
<http://www.orlandosentinel.com/news/orange/os-wedgefield-pluris-water-20170921-story.html>
- Orange moves toward buying water system that irks Wedgefield residents - November 28, 2017
<http://www.orlandosentinel.com/news/politics/political-pulse/os-wedgfield-water-discussion-20171128-story.html>
- Pluris doesn't want to sell Wedgefield water utility to Orange County - November 29, 2017
<http://www.orlandosentinel.com/news/politics/political-pulse/os-pluris-response-wedgefield-20171129-story.html>
- Wedgefield to Orange County: Take over our water plant - July 24, 2017
<https://www.clickorlando.com/news/investigators/wedgefield-to-orange-county-take-over-our-water-plant>
- A private company wants to charge this neighborhood more for their water, even though some residents refuse to drink it - September 13, 2017
<https://www.orlandoweekly.com/orlando/a-private-company-wants-to-charge-an-east-orange-county-area-more-money-for-their-water-even-though-some-residents-refuse-to-drink-it/Content?oid=6845670>
- Wedgefield residents make Pluris water a political issue for Ted Edwards - May 24, 2016
<http://www.wmfe.org/wedgefield-residents-make-pluris-water-a-political-issue-for-ted-edwards/60279>
- Wedgefield Residents Meet To Talk Orange County Takeover Of Water - September 29, 2016
<http://www.wmfe.org/wedgefield-residents-meet-to-talk-orange-county-takeover-of-water/64748>
- Wedgefield residents concerned over plans to disinfect water with chlorine dioxide - February 7, 2017
<https://www.wftv.com/news/local/wedgefield-residents-concerned-over-plans-to-disinfect-water-with-chlorine-dioxide/491673288>
- Residents angered with water utility Pluris over rate hike, dirty water - October 2, 2012
<https://www.wftv.com/news/local/residents-angered-water-utility-pluris-over-rate-h/287780938>
- Wedgefield fights water rate hike amid ongoing complaints of unusable water - November 2, 2017
<https://www.wftv.com/news/local/wedgefield-fights-water-rate-hike-amid-ongoing-complaints-of-unusable-water/636998975>

[2] Resident photographs follow on next page.



Photo 1 -

Jar and filter on left from Pluris, Jar and filter on right after home water softener



Photo 2 -

New Hose after 1 year of use



Photo 3 -

New filter of left and Pluris water on right. Two months of use.

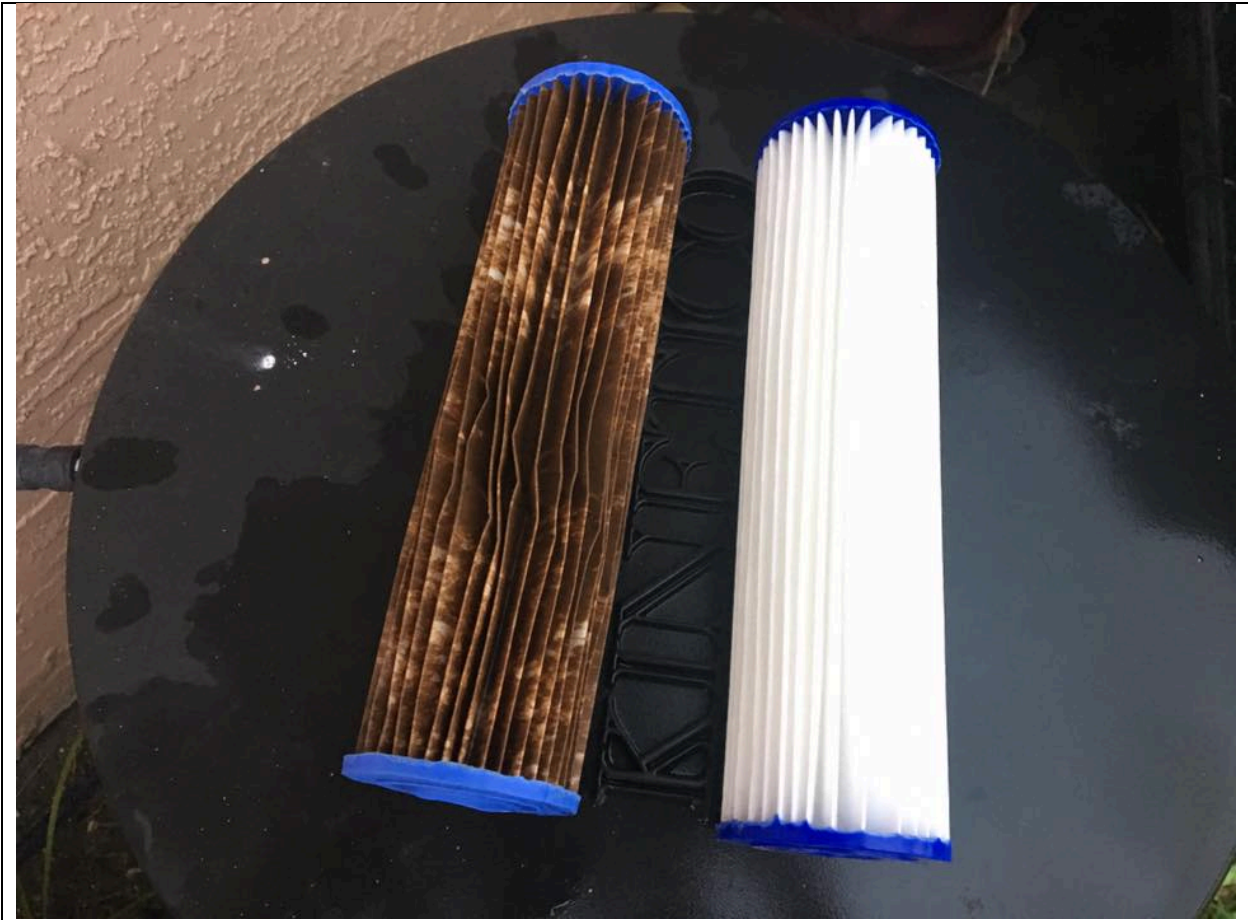


Photo 4 -

Pluris water on left and new filter on right. Two months of use.



Photo 5 -

Left to right: Pluris water, New filter, Pluris water after home water softener, new filter. Two months of use.

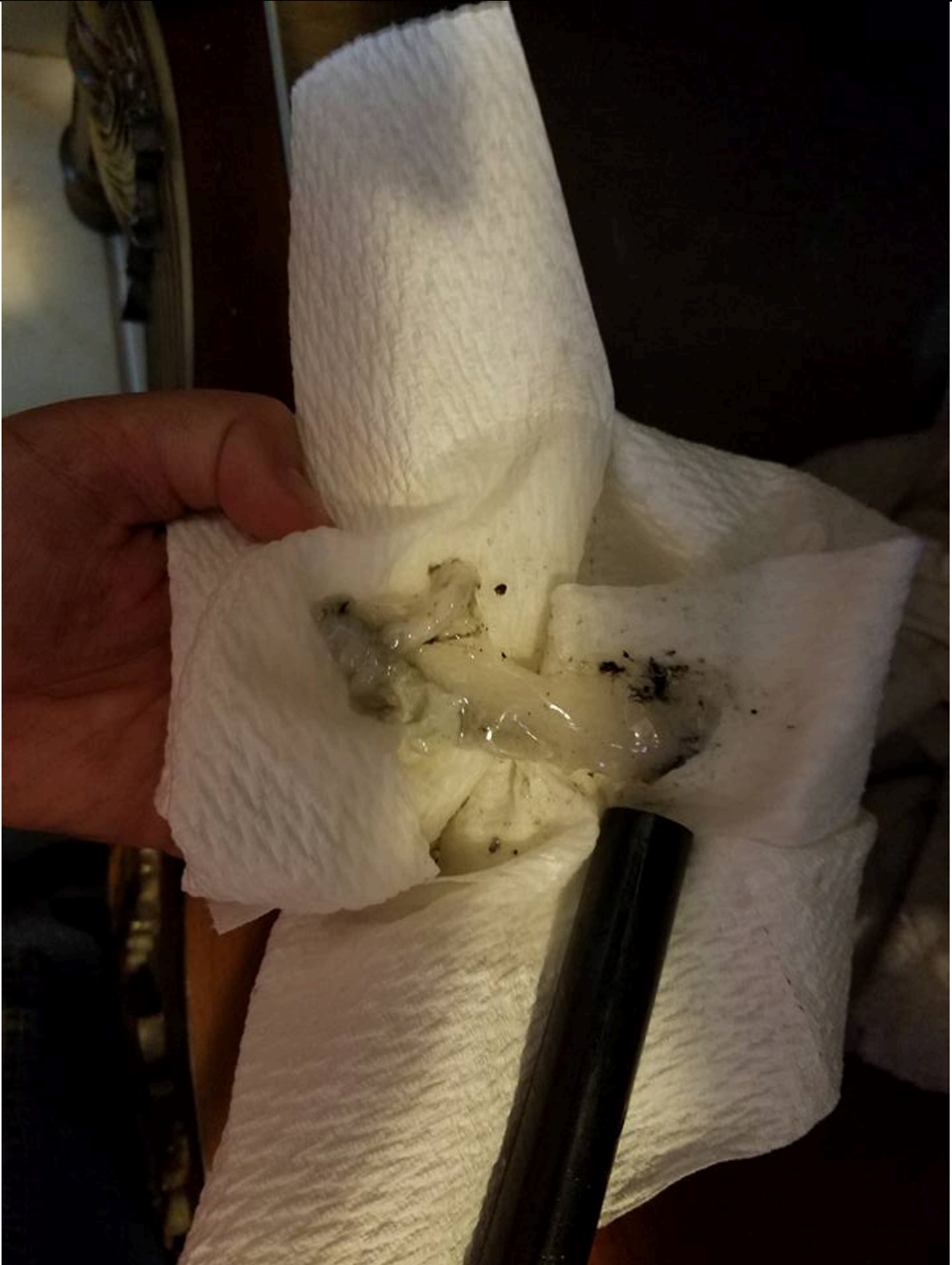


Photo 6 - Algae buildup in water line and drain.



Photo 7 - Bleached clothing after FDEP approval of Chlorine Dioxide (CLO₂) use in Pluris water.



Photo 8 - Bleached clothing after FDEP approval of Chlorine Dioxide (ClO₂) use in Pluris water.



Photo 9 - Pluris water plant, draining into Wedgefield park.



Photo 10 - Pluris water plant, draining from park to street.



Photo 11 - Blue Pluris water