## State of Florida



## Jublic Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DEC -

DATE:

December 3, 2012

TO:

Ann Cole, Commission Clerk, Office of Commission Clerk

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FROM:

James E. McRoy, Utility System/Engineering Specialist, Division of Engineering

RE:

Docket No. 120152-WS; Application for increase in water and wastewater rates in

Orange County by Pluris Wedgefield, Inc.

Attached is responses from the Utility regarding Staff's request for additional information from Pluris Wedgefield, Inc. Please place the attached documents in the docket file.

Should you have any questions, regarding this matter, please contact me.

Attachments

COCUMENT NUMBER - PAT



November 30, 2012

James McRoy Utility System/Engineering Specialist Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0719

Re: Summary of New SCADA System for Water Treatment Facility - MIEX Plant

Dear Mr. McRoy,

In accordance with your request, Pluris is providing a brief summary of the reasons for Pluris having to replace the original SCADA system provided by ORICA, the manufacturer of the magnetic ion exchange treatment plant ("MIEX®") the former owner added to the existing water treatment plant.

Pluris acquired the Wedgefield system from Utilities Inc. ("UI") in November, 2009. Over the next 12 months following the acquisition, Pluris identified a number of operational items with the ORICA SCADA system, including but not limited to SCADA software not communicating with many different nodes important in operating valves, motors and procedures for backwashes and resin regeneration cycles.

Pluris placed numerous calls to Orica personnel in an attempt to rectify the issues referenced. ORICA's response varied with each call from software licensing agreements needed to be entered into and paid annually, to not being able to solve the operational items with the current ORICA software.

ORICA personnel resisted any onsite field trips to solve the items and instead initially attempted to effect repairs remotely through internet connection only and this did not solve any of the identified issues. Pluris staff continued to press Orica for answers and corrections only to be delayed by one reason or another. Through continued and blunt discussions, ORICA did arrange to have a repair technician travel to the facility in an attempt to solve the issues outlined by Pluris staff. The ORICA technician spent twelve hours at the facility only to inform Pluris that he was unable to correct the issues and that Pluris would need to have another repair company come in to investigate the issues.

Pluris immediately contacted E&R Mechanical ("E&R"), an electrical contractor well respected and experienced in SCADA systems to perform onsite diagnostics to identify the issues and recommend solutions. E&R's technician identified the issues within ½ hour of being on site. In order to integrate SCADA seamlessly across the MIEX component and the total water plant, the company's recommendation was to have ORICA amend its software or to install new software.

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Based on ORICA's resistance to work with Pluris on solutions and the concern that ORICA could not solve the issues with the current software and would have to amend its own software, Pluris discussed potential SCADA solutions further with E&R.

Pluris knew it had to make a decision and key items influencing this decision included the following;

- An amending of the existing SCADA system and/or installation of a new SCADA system was necessary to address operational items that may not have been known during the original design in 2006.
- Pluris had substantial concern that ORICA would use the issues to increase costs for amending software to address the new issues. This would not be fair to rate payers if another company would be more cooperative and competitive in a new SCADA system.
- E&R guaranteed that a new SCADA system would allow Pluris staff to make adjustments to operational procedures to enhance the performance of the MIEX treatment system.
- E&R guaranteed that the SCADA system would provide seamless integration across the entire water treatment plant.
- E&R committed to providing ongoing service calls to cover their system in a timely manner following any requests for service from Pluris. ORICA would take several days to a week to respond.

Based on the aforementioned, Pluris made the decision to install the E&R SCADA system in lieu of amending the ORICA system to insure complete integration.

Pluris trusts the information provided above addresses any concerns in the matter. Should you have any additional questions please do not hesitate to call me (813) 359-8326.

Sincerely.

Joseph M. Kuhns Regional Manager Pluris Holdings, LLC

**J** .



November 30, 2012

James McRoy
Utility System/Engineering Specialist
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0719

Re: Florida Department of Environmental Protection ("FDEP") August 15, 2012 Inspection Letter.

Dear Mr. McRoy,

In accordance with your request made in our telephone conversation earlier today, Pluris is forwarding this correspondence concerning the August 15<sup>th</sup>, 2012 FDEP letter.

As in this letter to you today, Pluris always immediately responds to any agency correspondence and typically on the same day it is received. Pluris received the FDEP letter and noted that the FDEP was noticing Pluris that it was in substantial compliance and did not request a response from Pluris.

I followed up with a call to Mr. William Hesser with the FDEP to confirm. Mr. Hesser did corroborate that no response letter was required due to the Wastewater Treatment Facility being in substantial compliance.

Please do not hesitate to call me (813) 359-8326 should you have any further questions.

Sincerely

Joseph M. Kuhns / Regional Manager

Pluris Holdings, LLC