

Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A.  
420 South Orange Avenue, Suite 700  
P.O. Box 2346 (ZIP 32802-2346)  
Orlando, FL 32801

**Attorneys and Counselors at Law**  
Orlando  
Fort Pierce  
Tallahassee  
Viera/Melbourne  
Vero Beach  
Stuart (By Appointment)

(407) 841-1200  
(407) 423-1831 Fax  
www.deanmead.com

**MARTIN FRIEDMAN**  
407-310-2077  
mfriedman@deanmead.com

December 18, 2023

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

RECEIVED-FPSC  
2023 DEC 22 AM 9:48  
COMMISSION CLERK

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

Dear Mr. Teitzman:

On December 18, 2023, I efiled a Request for Confidential Classification on behalf of Pluris Wedgefield, LLC, a copy of which is enclosed (without attachments). The highlighted confidential documents are in a box appropriately marked.

Should you or Staff have any questions regarding this please do not hesitate to contact me.

Very truly yours,



Martin Friedman

MSF:

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

REQUEST FOR CONFIDENTIAL CLASSIFICATION

Pluris Wedgefield, LLC ("**Applicant**"), by and through its undersigned attorneys and pursuant to Rule 25-22.006(4), Florida Administrative Code ("**FAC**") and Section 367.156, Florida Statutes, hereby requests confidential classification of certain financial information provided by the Applicant to the auditors in response to Audit Request No. 47, and in support shows as follows:

1. Audit Request No. 47 requests "the Parent Company's Tax Returns for 2019, 2020, 2021 and 2022" ("**Tax Returns**"). Applicant is providing the requested Tax Returns ("**Confidential information**") of its parent, Pluris Holdings, LLC in response to this audit request, although Applicant is unaware of the purpose for which they were requested.

2. The Applicant seeks to have the Confidential Information classified as confidential pursuant to Rule 25-22.006(3), FAC. The Confidential Information should not be made available for inspection and examination by the public under Section 119.07(1), Florida Statutes, for the following reasons:

A. The ownership interests in Pluris Holdings are closely held and not publicly traded and the Confidential Information is not available to the public.

B. It is not necessary to make the Confidential Information available to the public, and the public will not be harmed in any way by withholding the Confidential Information from public disclosure.

C. The Confidential Information includes financial and other information regarding other affiliates of Pluris Holdings which is irrelevant to the determinations to be made by the Commission Staff in connection with the Application and which the Commission does not require in order to discharge its duties and responsibilities.

D. The Confidential Information is not intended to be, nor is it, treated by Pluris

Holdings as anything but private and confidential information, and has not been disclosed except pursuant to statutory provision, order of a court or administrative body or private agreement that provides that it will not be released to the public.

E. Disclosure of the Confidential Information would cause harm to the owners of Pluris Holdings and business operations of Pluris Holdings.

F. Disclosure of the Confidential Information would negatively affect the way Pluris Holdings' business plans and strategies are carried out.

4. Exhibit "A" to this Request is a "Justification Table" which specifies what information in the Confidential Information the Applicant asks the Commission to classify as confidential and the statutory justification for the request in compliance with Rule 25-22.006(4)(a), (b) and (c), FAC; one highlighted copy and one redacted copy of the Confidential Information.

WHEREFORE, Pluris Wedgefield, LLC respectfully requests that the Commission determine that the Confidential Information is entitled to confidential treatment pursuant to Section 367.156, Florida Statutes, and Rule 25-22.006, FAC, and exempt the Confidential Information from public inspection and examination.

Respectfully submitted on this 18<sup>th</sup> day of December, 2023, by:

Dean Mead  
420 S. Orange Ave., Suite 700  
Orlando, FL 32801  
Telephone: (407) 310-2077  
Fax: (407) 423-1831  
[mfriedman@deanmead.com](mailto:mfriedman@deanmead.com)

/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 18<sup>th</sup> day of December, 2023:

Walt Trierweiler, Esquire  
Octavio Simoes-Ponce, Esquire  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400  
[trierweiler.walt@leg.state.fl.us](mailto:trierweiler.walt@leg.state.fl.us)  
[ponce.octavio@leg.state.fl.us](mailto:ponce.octavio@leg.state.fl.us)

Jennifer Crawford, Esquire  
Austin Watrous, Esquire  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us)  
[awatrous@psc.state.fl.us](mailto:awatrous@psc.state.fl.us)

/s/ Martin S. Friedman  
Martin S. Friedman



**Exhibit "A"**  
**JUSTIFICATION MATRIX**

Location (Document name and location of information)	Justification
<p><b><u>All Tax Returns</u></b></p> <p><b><u>Location:</u></b> All information other than the filing party information at the top of the first page</p>	<p>§367.156(3)(a),(b),(d) &amp; (e): As set forth in the Request and the disclosure of the Tax Returns of Pluris Holdings, LLC, which is not a public company and is not subject to public disclosure of its financial statements would impair its competitive interests, could be used to discern trade secrets, or harm its ability to contract for goods and services on a favorable basis. Pluris Holdings LLC, keeps this information strictly confidential also to prevent competitors and prospective counterparties from information which could be used in future negotiations to the disadvantage of Pluris Holdings, LLC, and its affiliates.</p>