

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

(407) 841-1200 (407) 423-1831 Fax www.deanmead.com Attorneys and Counselors at Law

Orlando Fort Pierce Naples Viera/Melbourne Vero Beach

MARTIN FRIEDMAN

407-310-2077 mfriedman@deanmead.com

February 16, 2024 via efiling

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

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

Dear Mr. Teitzman:

On behalf of Pluris Wedgefield, LLC ("Pluris" or "Utility") this letter is the response to Staff's Tenth Data Request dated February 12, 2024.

- 1. Please answer the following questions regarding the AC Replacement Project:
 - a. Please provide a copy of the requested scope of work given to the three companies contacted for bids for the Pro Forma AC replacement project. Response: Pluris did not prepare a formal written scope of work for the contemplated services. Pluris has used and continues to use underground contractors for various projects whom all, based on historical performance, have the capability and resources to complete projects in a timely and cost-effective manner. Pluris met with each of the contractors to conduct an on-site walk-through and visual inspection of the contract area. Engineered plans of the work area were supplied to each contractor during the on-site inspection. Contractors were each briefed on the scope of work during the site walk-through inspections. Contractors were informed and each acknowledged that all work would be in accordance with the generally accepted local governmental requirements. Upon commencement of the project and during the length of the project, on-site

meetings will be conducted to assure the work required is completed in accordance with generally accepted contracting methods and in accordance with local governmental requirements.

i. Was the activity 'plug and abandon existing AC pipes in place' part of the scope of work for the three bids?

Response: "Plug and abandon existing AC pipes in place" was chosen for the project as the method used in replacing AC pipe, in minimizing any fugitive issues with asbestos. This was communicated with each contractor. Tri Sure Corporation and Environmental Equipment Sales, Inc., did produce bids that reflected this method. The third bidder, All Site Contracting, Inc., contrary to bid instructions prepared a bid with the "pipe bursting" option and determined to be non-responsive.

- b. Refer to Tri-Sure Corporation's revised bid included in Pluris' response to Staff's Seventh Data Request, Question No. 1:
 - i. When was this bid provided to the Utility? *Response: February 5, 2024*
 - ii. Please explain why "plug and abandon existing AC pipes in place" was added to the bid.

Response: The "plug and abandon existing AC pipes in place" was mistakenly omitted from the wording in the initial bid and corrected.

- iii. Was there a cost for "plug and abandon existing AC pipes in place" in the original bid submitted with the MFRs? If not, why not? Response: The MFRs included the initial costs from the then lowest responsive bidder with an amount of \$2,515,214.00. The best and final responsive bid by Tri Sure Corporation was \$2,776,518.00, reflecting an increase in cost of \$261,304. This additional amount is requested for recovery.
- iv. Please explain why "Mobilization of equipment & personnel/General Conditions" increased from \$90,000 in bid filed with MFRs to \$631,738 in the revised bid included in Staff Seventh Data Request, a 602 percent increase in costs.

Response: Pluris does not know the answer. The best and final lowest responsive bidder Tri Sure Corporation provided a bid of \$2,776,518.00.

February 16, 2024 Page 3

The second lowest responsive bidder was Environmental Equipment Sales, Inc., with a bid of \$3,700,000.00. The two responsive bids are lump sum bids with no contingencies applied.

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

Very truly yours,

/s/ Martin S. Friedman
Martin Friedman

MSF:

Cc: Greg Davis (via email)