

## NORTH CAROLINA PUBLIC STAFF UTILITIES COMMISSION

October 5, 2023

## **VIA ELECTRONIC MAIL**

Ms. A. Shonta Dunston, Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4300

Re: Docket No. W-1333, Sub 5 – Application for Certificate of Public Convenience and Necessity and for Approval of Rates to Provide Water & Sewer Utility Services in Currituck County

Dear Ms. Dunston:

Currituck Water and Sewer, LLC filed additional information in the aforementioned docket on September 20, 2023. The Public Staff has reviewed the filing and is of the opinion that the application remains incomplete for the reasons set forth below.

- 1. The information regarding how major improvements and additions contemplated in the next five and ten years will be financed (long-term debt, short-term debt, common stock, retained earnings, and other) required in Item 1 on page 8 of the Application Form was not provided.
- 2. The information regarding how major replacements contemplated in the next five and ten years will be financed (long-term debt, short-term debt, common stock, retained earnings, and other) required in Item 2 on page 8 of the Application Form was not provided.
- 3. A detailed written narrative explanation of all assumptions underlying the information and data contained in the addendum required by line 3 in the addendum instructions was not provided. The workpaper submitted as Exhibit 13 to the amended application does not include the required written explanation of the assumptions.

Executive Director (919) 733-2435

Accounting (919) 733-4279

Consumer Services (919) 733-9277

Economic Research (919) 733-2267

Energy (919) 733-2267 Legal (919) 733-6110

Transportation (919) 733-7766

Water/Telephone (919) 733-5610

Ms. A. Shonta Dunston Page Two October 5, 2023

- 4. Item 12 on the Application Form Exhibits list requires Currituck Water and Sewer, LLC to provide its most recent fiscal year financial statements on a stand-alone basis. The title of the financial statements provided indicates that the statements include information about two entities: (1) Currituck Water and Sewer, LLC and (2) Currituck Water and Sewer Holdings LLC.
- 5. A Statement of Cash Flows for Currituck Water and Sewer, LLC, also required by Item 12 on the Application Form Exhibits list, was not provided.
- 6. Item 13 on the Application Form Exhibits list requires Currituck Water and Sewer, LLC to provide a copy of Currituck Water and Sewer Holdings, LLC's most recent fiscal year financial statements. A Statement of Operations (alternatively referred to as the Income Statement) and a Statement of Cash Flows for Currituck Water and Sewer Holdings, LLC were not provided.

Based on the foregoing, the Public Staff respectfully recommends that the Commission determine that the items enumerated above are deficiencies and render the application incomplete. If the Commission does not consider any of the items listed above a deficiency, the Public Staff respectfully requests that the Commission issue an order directing Currituck Water and Sewer, LLC to file the information enumerated above in the docket and provide the Public Staff a copy within 10 calendar days.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Electronically submitted
/s/ Reita Coxton
Staff Attorney
reita.coxton@psncuc.nc.gov