

SANFORD LAW OFFICE, PLLC
Jo Anne Sanford, Attorney at Law

April 23, 2020

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Via Electronic Delivery

Re: Aqua North Carolina, Inc.
Docket No. W-218 Sub 526
Application by Aqua North Carolina, Inc., 202 MacKenan Court,
Cary, North Carolina 27511, for Authority to Adjust and Increase
Rates for Water and Sewer Utility Service in all Service Areas in
North Carolina
Motion for Extension of Time to File Response to Motion to Compel

Dear Ms. Campbell:

Attached please find a Motion for Extension of Time to File Response to the Public Staff's Motion to Compel, submitted for filing by Aqua North Carolina, Inc.

I hereby certify that this filing has been served on the Public Staff; the only other current party of record to this proceeding.

As always, we thank you and your staff for your assistance; please feel free to contact me if there are questions or if additional information is required.

Electronically Submitted

/s/Jo Anne Sanford
North Carolina State Bar No. 6831
Attorney for Aqua North Carolina, Inc.

c: Party of Record

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-218, SUB 526

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
Application by Aqua North Carolina, Inc.,)
202 MacKenan Court, Cary, North Carolina)
27511, for Authority to Adjust and Increase)
Rates for Water and Sewer Utility Service)
in All Its Service Areas in North Carolina)
	MOTION FOR EXTENSION
	OF TIME TO RESPOND TO
	MOTION TO COMPEL

NOW COMES AQUA NORTH CAROLINA, INC. (“Aqua” or “Company”), by and through the undersigned counsel, and requests a one-day extension of time to respond to the Motion to Compel filed and served by the Public Staff (or “Staff”) on April 22, 2020. In support of this Motion, Aqua respectfully shows the Commission the following:

1. Despite prodigious effort on the part of Aqua employees, working through nights and weekends, the significant level of response by the Company to the Public Staff’s extensive and expanding requests for discovery has not entirely met the Staff’s view of its requirements.

2. The parties have both worked courteously, and through late in the day yesterday, in an attempt to resolve the issues outstanding between them. The Public Staff provided an advance draft of its Motion to Compel, and Aqua has continued to work diligently to attempt to respond to the Public Staff requests for data and records. There are very sharp differences of opinion about whether information has already been provided and/or can be provided, as well as polar opposite views about relevance and burden.

3. Clearly, as evidenced by this Motion and the response that will follow, the facts are viewed very differently by the parties. Aqua submits that additional time is required to respond to the Public Staff's Motion, noting that meanwhile it continues to try to address both existing and new discovery requests. The same people who are involved in Aqua's ongoing production process are required to assist in the response to the Staff's Motion to Compel.

4. The Commission's Scheduling Order of February 14, 2020, provides at Paragraph 6 on page 3 that responses to Motions to Compel should be made within one business day of the Motion.

5. For the reasons set forth herein, Aqua requires an additional day to respond, or until close of business on Friday, April 24, 2020.

6. The Public Staff does not oppose this request.

WHEREFORE, Aqua respectfully requests a one-day extension of time, until April 24, 2020, to respond to the referenced Motion to Compel.

Respectfully submitted this the 23d day of April 2020.

**ATTORNEYS FOR AQUA NORTH CAROLINA, INC.
Electronically Submitted**

/s/Jo Anne Sanford

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO COMPEL**, filed by Aqua North Carolina, Inc. in Docket No. W-218, Sub 526 has been served on the Public Staff, North Carolina Utilities Commission, by hand delivery or electronic transmission to Megan Jost, Staff Attorney.

This the 23d day of April 2020.

**ATTORNEY FOR AQUA NORTH CAROLINA, INC.
Electronically Submitted**

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