

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. W-1300, SUB 60

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-1300 SUB 60

In the Matter of	)	
Application by Old North State Water	)	MOTION OF THE
Company, LLC, 3212 6 <sup>th</sup> Avenue	)	PUBLIC STAFF FOR
South, Suite 200, Birmingham,	)	EXTENSION OF TIME
Alabama 35222, for Authority to Adjust	)	
and Increase Rates for Water Utility	)	
Service in All Its Service Areas in North	)	
Carolina	)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully moves the North Carolina Utilities Commission (Commission) for an extension of time for the filing of the direct testimony of intervenors and the Public Staff- North Carolina Utilities Commission (Public Staff), filing rebuttal testimony of Old North State Water Company (ONSWC or the Company), if any, and serving and responding to discovery requests connected to these filing deadlines. In support of this motion, the Public Staff respectfully shows the Commission the following:

1. On June 29, 2021, ONSWC filed an Application for Rate Increase in Docket No. W-1300, Sub 60 (Sub 60 Rate Case).
2. On July 26, 2021 the Commission declared the proceeding to be a general rate case and suspended rates for up to 270 days.

3. On September 21, 2021, the Commission issued an *Order Establishing Discovery Guidelines, Scheduling Hearings, and Requiring Public Notice* (Procedural Order) which, among other things, directed ONSWC to file an update to its actual revenues, expenses, rate base, and cost of capital for the period ending August 31, 2021 with the Commission on or before September 20, 2021, required the Public Staff and intervenors to file direct testimony on or before October 28, 2021, and ordered the Company to file its rebuttal testimony and exhibits, if any, by November 12, 2021.

4. The Public Staff has been working diligently on this matter, including conducting discovery and preparing its testimony, but needs additional time to review and address in its testimony recently-received and forthcoming data request responses from the Company, notably the Company's update received, in part, on October 11, 2021. Therefore, the Public Staff will not be in a position to file testimony by October 28, 2021.

5. The Public Staff respectfully requests that the Commission extend the due date for the filing of the direct testimony and exhibits of intervenors and the Public Staff in this docket to November 2, 2021, and for the filing of the rebuttal testimony and exhibits of the Company, if any, to November 15, 2021.

6. The Public Staff also respectfully requests that the Commission extend the discovery request and response deadlines connected to the testimony filing deadlines, and that the Commission apply the same request and response timeframes set forth in the Procedural Order to each new testimony filing deadline.

7. The Public Staff has contacted counsel for the Company and the Company did not object to the proposed extensions.

WHEREFORE, for the reasons set forth above, the Public Staff respectfully requests that the Commission extend the time for filing intervenor and Public Staff testimony and exhibits to November 2, 2021, for the filing of Company rebuttal testimony and exhibits, if any, to November 15, 2021, and for serving and responding to discovery requests connected to these testimony deadlines.

Respectfully submitted this 13th day of October, 2021.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

Dianna W. Downey  
Chief Counsel

Dianna W. Downey  
Chief Counsel

Dianna W. Downey  
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Electronically submitted  
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### CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of the foregoing Motion upon each of the parties of record in this proceeding or their attorneys of record by emailing them an electronic copy or by causing a paper copy of the same to be hand-delivered or deposited in the United States Mail, postage prepaid, properly addressed to each.

This the 13th day of October 2021.

Electronically submitted  
/s/ Reita D. Coxton