

**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	)	JOINT MOTION FOR
27511, for Authority to Adjust and Increase	)	APPROVAL OF AN ORDER
Rates for Water and Sewer Utility Service	)	REVISING A PORTION OF
in All Its Service Areas in North Carolina	)	THE FILING SCHEDULE
	)	

**NOW COME AQUA NORTH CAROLINA, INC.** (“Aqua” or “Company”), and the Public Staff (collectively, “Petitioners”) by and through the undersigned counsel, and request Commission approval of certain revisions to the scheduling requirements for a portion of the Proposed Order, pertaining only to those matters that address customer service/reporting. In support thereof, Petitioners say the following:

1. By earlier order in this case and due to the impact of the novel coronavirus, the Commission was required to cancel the initially scheduled public hearings and to postpone them to a later date. This was an unavoidable and necessary decision, and it resulted in the public hearings being held on August 3, 2020, after the Public Staff had filed its testimony, after Aqua filed its rebuttal, and after the evidentiary hearing of August 8, 9, 10, and 13, 2020.
2. Aqua will file its Report on Customer Concerns on August 24, 2020, and the Public Staff will file its verified response to Aqua’s report on September 4, 2020,

as directed by the Commission's Order of June 29, 2020. At the conclusion of the evidentiary hearing, the Commission also afforded the parties the opportunity to file Supplemental Proposed Orders following the public hearings.

3. Meanwhile, the Proposed Orders in this case are due on August 17, 2020. The issue of customer service/reporting requirements is an unresolved issue as between Aqua and the Public Staff - one of four such categories of issues.

4. Petitioners submit that it is neither feasible nor productive to include in their filings of August 17, 2020, the section on customer service/reporting requirements because the evidentiary record pertaining to those matters will not be complete until the Company files its report on the public hearings on the August 24, 2020, and the Public Staff files its verified response to the Company report on September 4, 2020.

5. Additionally, Aqua requests that the Commission amend its procedural order to afford the Company the opportunity to file a response to the Public Staff's report of September 4, 2020. Aqua submits that the goal should be to replicate, as nearly as possible, the procedures inherent in a "normal" proceeding in which the Utility files rebuttal to the Intervenor's testimony and when the Utility presents its rebuttal testimony at hearing, after the Intervenor has presented their evidence.

6. The Public Staff requests that the interval between filing of the last report/response and the due date for the customer service/reporting requirements portion of the Proposed Order be two weeks, given the intense press of business for the Staff due to the Duke rate cases.

7. By holding to the August 17, 2020 filing deadline for Proposed Orders that are complete, except for the issues related to the public hearings, including the issue of customer service/reporting requirements, the Commission has before it for examination, on the present schedule, the bulk of the issues in this case.

8. By modifying the schedule as requested herein, the evidentiary record can be completed and in proper order. Therefore, the Parties respectfully request the following adjustments to the schedule for finalizing the filings in this case, all driven by the aforementioned necessity to move the public hearings until a date after the evidentiary hearings:

- That the Proposed Orders, due on Monday, August 17, 2020, are not required to address issues related to the public hearings, including the issue of customer service/reporting requirements, but that those Orders are to address all other matters, including rates and schedules.
- That the Company's obligation to file by August 24, 2020, its Report on Customer Concerns From the August 3, 2020 Public Hearings, remains intact.
- That the Public Staff's opportunity to file its response to Aqua's Report by September 4, 2020, remains intact.
- That the Company have until September 11, 2020, to file a reply or to indicate that it does not need to do so.
- That the parties have until September 25, 2020, to file Supplemental Proposed Orders addressing issues related to the public hearings, including Customer Service/Reporting Requirements.

**WHEREUPON**, the Petitioners respectfully request that the Commission approve the revisions to the filing schedule that are contained herein, and require:

1. The Proposed Orders due on August 17, 2020, shall in all ways be complete, except for issues related to the public hearings, including the issue of customer service/reporting requirements.
2. Aqua shall file its response to customer concerns, as expressed at the August 3, 2020 public hearings, on August 24, 2020, as previously ordered.
3. The Public Staff shall file its verified response by September 4, 2020, as previously ordered.
4. Aqua shall have until September 11, 2020, to either file a response to the Public Staff's verified response or to notify the Commission and all parties that it has none.
5. The parties shall have until September 25, 2020, to file Supplemental Proposed Orders addressing issues related to the customer hearing, including customer service/reporting requirements.

The Attorney General has been notified of this request and does not oppose it.

Respectfully submitted this the 13th day of August, 2020.

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

**Electronically Submitted**

**/s/Jo Anne Sanford**

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Christopher J. Ayers  
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Electronically submitted  
/s/ Megan Jost  
Staff Attorney

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **JOINT MOTION FOR APPROVAL OF AN ORDER APPROVING REVISING A PORTION OF THE FILING SCHEDULE FOR PROPOSED ORDERS PERTAINING TO CUSTOMER SERVICE/REPORTING**, filed by Aqua North Carolina, Inc. in Docket No. W-218, Sub 526, has been served on each of the parties to this proceeding.

This the 13th day of August, 2020.

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

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