

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. W-1305, Sub 35  
DOCKET NO. W-1300, Sub 77

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
WLI Investments, LLC, 60	)	
Gregory Road, Suite 1, Belville,	)	
NC 28451,	)	
Complainant,	)	
	)	
v.	)	
	)	
Old North State Water Company,	)	
Inc.	)	
and Pluris Hampstead, LLC,	)	
Respondents.	)	OLD NORTH STATE WATER COMPANY, INC.'s DATA REQUEST NO. 1 TO WLI INVESTMENTS, LLC

Please provide all responses to this discovery request in searchable native electronic format (e.g., Excel or Word files). If the responsive document is in Excel format, please include all working formulas. If the responsive document is in PDF format, please provide it in OCR searchable form.

In addition, please include the name, occupation, and job title of each individual who is providing each response.

Please provide all responses to the attorneys indicated below by **September 2, 2022**. Please provide responsive information as it becomes available rather than waiting to send all responses at once.

1. Please provide copies of all emails, correspondence, and records (both electronic and hard copy) which were sent or received by WLI Investments, LLC, or its officers, managers, owners, employees, consultants, and agents (collectively "WLI"), which are related to installation or use of grinder pumps or a low pressure collection system for the Lea Tract Extended Service Area.

2. Please provide a copy of all writings made pursuant to Section 17.1 of the December 13, 2018, Agreement between WLI and Old North State Water Company (the Agreement attached as Exhibit A to WLI's Complaint in this docket).
3. Please identify all numbered sections of the December 13, 2018, Agreement between WLI and Old North State Water Company that apply specifically to the Lea Tract Extended Service area.
4. Please identify any wording or provision in the December 13, 2018, Agreement between WLI and Old North State Water Company that in WLI's opinion requires or affirmatively provides for installation of grinder pumps or a low pressure collection system in the Lea Tract Extended Service Area.
5. Please provide a copy of any engineering drawings or specifications created by or on behalf of WLI or any other person or entity for a low pressure collection system for use in the Lea Tract Extended Service Area.
6. Please provide a copy of any engineering drawings or specifications created by or on behalf of WLI or any person or entity for a non-low pressure collection system for use in any of WLI's existing and planned developments.
7. Please provide a list of all witnesses that WLI intends to call at the hearing in this matter.

Please email responses to

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*Attorney for Old North State Water  
Company, Inc.*

With a copy to

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*Attorney for Pluris Hampstead, LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Data Request No. 1, has been served on all parties and counsel of record in these dockets by either depositing same in a depository of the United States Postal Service, first-class postage prepaid and mailed by the means specified below, or by electronic delivery.

This the 24th day of August, 2022.

FOX ROTHSCHILD LLP

By: /s/ David T. Drooz  
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