

INFORMATION SHEET

PRESIDING: Commissioner Karen M. Kemerait, Presiding; Commissioners Daniel G. Clodfelter and ToNola D. Brown-Bland

PLACE: Iredell County Hall of Justice Annex,
Statesville, North Carolina

DATE: Thursday, March 23, 2023

TIME: 11:03 a.m. – 1:26 p.m.

DOCKET NOS.: W-354, Sub 414

DESCRIPTION: In the Matter of Don Calhoun, 393 Bayberry Circle, Mooresville, North Carolina,
Complainant versus Carolina Water Service of North Carolina, Inc., Defendant.

VOLUME NUMBER:

APPEARANCES

(See attached)

WITNESSES

(See attached)

EXHIBITS

(See attached)

REPORTED BY: Tonja Vines
TRANSCRIBED BY: Tonja Vines
DATE FILED: April 14, 2023

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TOTAL PAGES: 133

1 PLACE: Iredell County Hall of Justice Annex
2 Statesville, North Carolina
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6 BEFORE: Commissioner Karen M. Kemerait, Presiding
7 Commissioner ToNola D. Brown-Bland
8 Commissioner Daniel G. Clodfelter
9
10
11

12 IN THE MATTER OF:

13 Don Calhoun,

14 393 Bayberry Creek Circle

15 Mooresville, North Carolina 28117,

16 Complainant

17 v.

18 Carolina Water Service of North Carolina, Inc.,

19 Defendant
20
21
22
23
24

A P P E A R A N C E S:

Don Calhoun, pro se

393 Bayberry Creek Circle

Mooreville, North Carolina 28117

FOR CAROLINA WATER SERVICE OF NORTH CAROLINA, INC.,

Jo Anne Sanford, Esq.

Sanford Law Office

721 North Bloodworth Street

Raleigh, North Carolina 27604

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**NORTH CAROLINA UTILITIES COMMISSION
APPEARANCE SLIP**

DATE: March 23, 2023 DOCKET NO.: W-354, Sub 414
ATTORNEY NAME and TITLE: Jo Anne Sanford, Esq.

FIRM NAME: Sanford Law Office

ADDRESS: 722 North Bloodworth Street

CITY: Raleigh STATE: NC ZIP CODE: 27604

APPEARANCE ON BEHALF OF: Carolina Water Service
of North Carolina

APPLICANT: ___ COMPLAINANT: ___ INTERVENOR: ___

PROTESTANT: ___ RESPONDENT: ___ DEFENDANT: X

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ONLY fill out this portion if you have signed an NDA to receive **CONFIDENTIAL** transcripts and/or exhibits:

☒ Yes, I have signed the Confidentiality Agreement.

Email: _____

SIGNATURE: _____

(Signature Required for distribution of CONFIDENTIAL information)

Ex. 1

iMessage
Thu, Mar 9, 11:38 AM

Calhoun Exhibit 1
W-354 Sub 414
I/A

OFFICIAL COPY

Apr 20 2023

Hi. I have a voicemail from this number. Are you trying to reach Don Calhoun?

Yes

Okay thanks. I'm at the airport. What can I help you with ?

Sorry to bother you. My name is Gary Peacock. I am a State director of operations for Carolina Water Service. I was hoping to speak to you about your situation and see if we can talk.

We had originally extended an offer for adjustment on your bill of \$650. That was the reason for my call. You can call me if you would like.

Thanks. I have a hearing w NCUC March 23. I plan on attending the hearing.

I am aware of the hearing. Call me if you want to discuss. I want to help you if I can. Thank you

Thanks. I think I'm all set.

Friday 1:18 PM

I'm back in town and was cleaning up messages. I am just following up - did you need to speak with me?

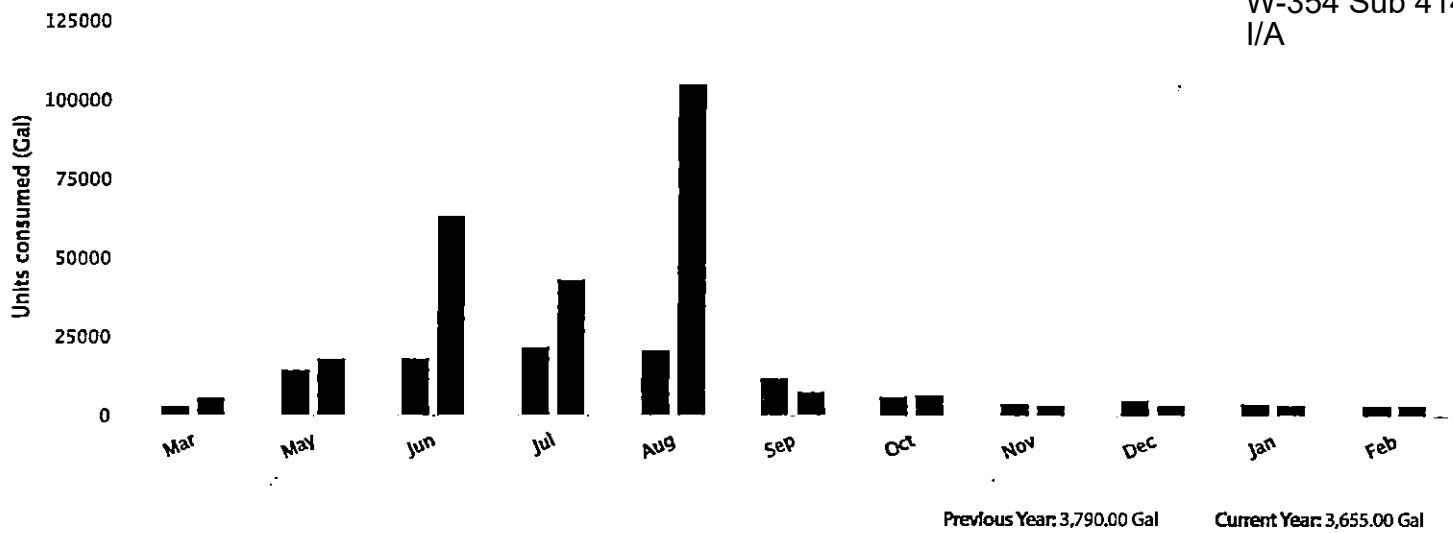
I think it was resolved in the text messages. I was going to see if we could extend the \$650 credit to you again to help resolve the issue to avoid going to the commission hearing. If I understand you want to proceed with the hearing.
Thanks

Of course I'm available if you want to discuss anything.

Ok thank you. I wasn't sure where it was left. I appreciate the offer but do want to proceed with the hearing. Thanks

Read Friday

Yes sir I understand. Thank you and have a good weekend.



Compare Me shows your current month or year usage compared to your usage in the previous month or year.

Terms & Conditions (<https://account.myutility.us/account/TnC.aspx>)

Privacy (<https://account.myutility.us/account/PrivacyPolicy.aspx>)

Version No. 7.0.2

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Ex. 2

Ex. 3


BILLING


USAGE


COMPARE


ALERTS


NOTIFICATIONS


CONTACT US


SERVICE

Meter Number

25,885.80 Gal

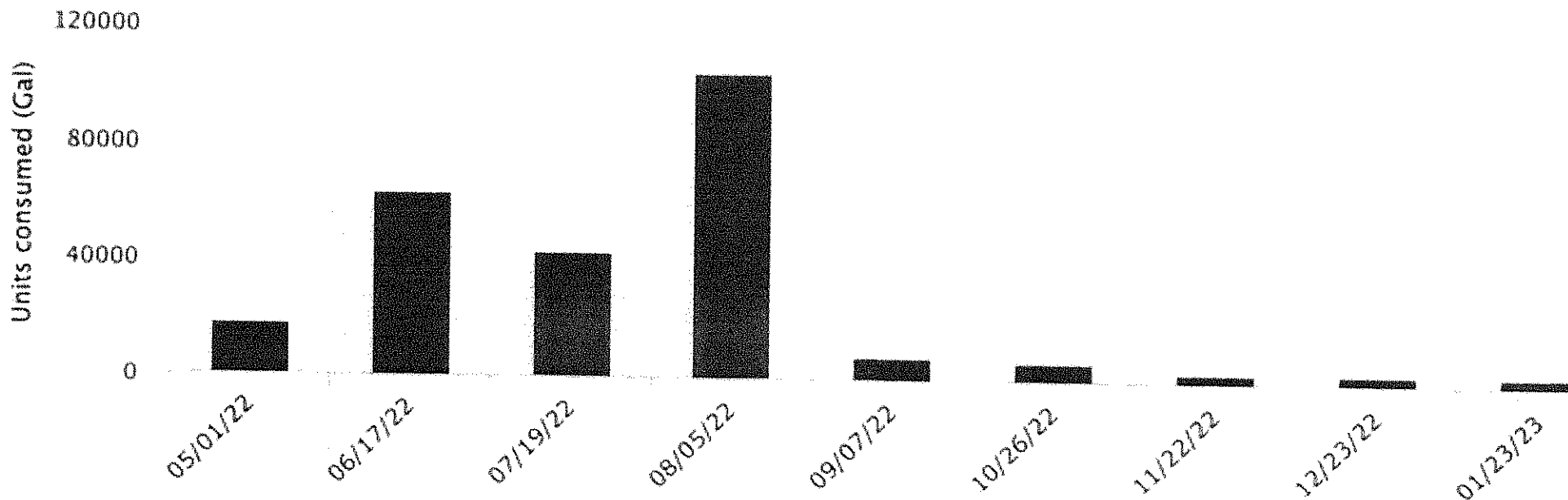
BILLING PERIOD AVERAGE

105,024.00 Gal

HIGHEST MONTH THIS YEAR



Period: May 2022 To Feb 2023



 Export to Excel

Ex. 4



Carolina Water Service
of North Carolina™

CAVANAUGH
Stewardship Through Innovation

The timing of the field visits was approximately 30 days from the previous meter reads, so a comparison of the volume for that period was compared to the previous consumption (as displayed in the billing data export). (The following accounts were flagged because consumption was greater than 15,000 gallons greater than the previous month's consumption:)

0864510000	171 STONEWALL BEACH LN	4167620	4164820	2,800	4205010	37,390	34,590
2907771520	139 LIGHTSHIP DR	3370580	3359580	11,000	3409830	39,250	28,250
0811952463	111 SWAYNE DR	473390	470590	2,800	500570	27,180	24,380
0326513228	201 STONEWALL BEACH LN	3208090	3202700	5,390	3234270	26,180	20,790
8377703901	306 BAYBERRY CREEK CIR	3051830	3048250	3,580	3073480	21,650	18,070
1378629953	127 BAYBERRY CREEK CIR	3911960	3886500	25,460	3954410	42,450	16,990
2925869147	177 BROWNSTONE DR	4848780	4837850	10,930	4875300	26,520	15,590

(The dramatic increase in consumption could be legitimate based on actual usage changes, but these would be representative of "high" consumption values that should trigger a work order for further investigation)

Final Conclusion and Recommendations

Based on the findings included in this analysis, we did not identify significant or negligent issues associated with the current meter reading and billing processes of the The Harbour/The Point/The Farms water systems. The items noted above in the review and sampling appear consistent with routine operations and billing standards Cavanaugh has observed during similar analysis for Utilities nationally.

We would recommend the following best practices be implemented or continued:

- Conduct field verification of the meter information on all accounts in the three systems.
- Randomly select accounts from each billing cycle to manually check the application of the rate schedule vs. the billing calculation conducted by the billing software.

Account Number: 0081608825**Bill Date: 08/03/2022****Name: DON CALHOUN****Due Date: 08/24/2022****Phone: (704) 609-0242****Please Pay: \$650.15****Service Address: 393 BAYBERRY CREEK CIR MOORESVILLE, NC 28117****Carolina Water Service**
of North Carolina™Customer Service: (800) 525-7990
Collections: (800) 525-7990
www.carolinawaterserviceinc.com**Meter Information**

Badge Nbr	Service Type	Start Read Date	Start Read	End Read Date	End Read	Total Usage	Days In Cycle	Avg Daily Use	Cons
220745442	Water	06/17/2022	63750	07/19/2022	106840	43,090 GAL	32	1,346.56 GAL	1

Bill Details**Activity Since Last Bill**

Previous Balance \$771.04
 Payments received as of 08/03/2022 \$0.00
 Balance as of 08/03/2022 \$771.04

Adjustments

Miscellaneous Adjustment - Water -\$650.00

Residential Water Service

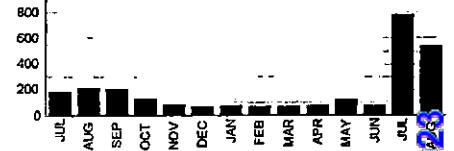
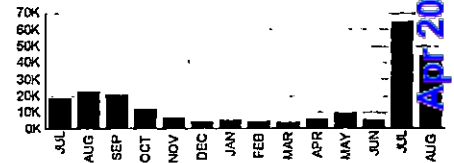
Residential Water Base Charge \$24.53
 43,090 gallons at \$11.71 per 1,000 gallons \$504.58
 Total Residential Water Service \$529.11

Current Charges

Total Due Amount \$650.15

Message Center

Customers paying by check processing changes from USPS are causing extended First Class mail delivery times and your bill payment may now take longer to post to your account. View your account and sign up for automatic bill pay at connect.myutility.us. Our records indicate the previous balance remains unpaid. Please contact Customer Service if you require payment arrangements to extend the time allowed for payment of your bill.

Billing History
in dollars**Consumption History for Water**
in GAL

EX 7

The payment for this bill is due upon receipt. Make check payable to: Carolina Water Service Inc of NC.
 Rate Schedules are available upon request. Visit www.carolinawaterserviceinc.com for important account offerings

**Carolina Water Service**
of North Carolina™

008160882500000650151

PO BOX 160609
Altamonte Springs, FL 32716-0609**Account Number:** 0081608825**Due Date:** 08/24/2022**Please Pay:** \$650.15**Amount Paid**

UTQ0804A AUTO SCH 5-DIGIT 28036
7000001789 00.0008.0049 931/1DON CALHOUN
393 BAYBERRY CREEK CIR
MOORESVILLE NC 28117-6610CAROLINA WATER SERVICE INC OF NC
PO BOX 70723
PHILADELPHIA, PA 19176-0723☐ Address correction requested on back

Don Calhoun
393 Bayberry Creek Circle, Mooresville, NC 28117
Cell 704-609-0242/Email don.calhoun47@gmail.com

October 3, 2022

W-354 Sub 414

Chief Clerk

North Carolina Utilities Commission

4325 Mail Service Center

Raleigh, NC 27699-4300

Dear Sir or Madam,

1. My name is Don Calhoun. I reside at 393 Bayberry Creek Circle, Mooresville, NC 28117. My phone number is 704-609-0242. My email address is 704-609-0242.
2. My complain relates to Carolina Water Service with the following contact information:

Carolina Water Service of NC

PO Box 160609

Altamonte Springs, FL 32716-0609

Tel: 800-525-7990

Fax: 866-842-8348

Email: customerservice@carolinawaterservice.com

Website: www.carolinawaterservice.com

3. My complaint concerns Carolina Water Service of North Carolina and their water usage and billing information. We have lived at the same residence for 10 years. In July of 2020, Carolina Water Service billed us \$71.00 for using 5,170 gallons. In July of 2021 Carolina Water Service billed us \$177.67 for using 18,030 gallons. In June of 2022 we were billed \$68 for using 4,700 gallons. In July

of 2022 that number jumped to **\$771.04 claiming usage of 63,750** gallons of water. In August of 2022 we were billed \$650.19 for using 43,090 gallons. In September we were billed \$409.94 for using 35,008 gallons. Our current usage per www.myutilityconnect.com shows an absurd amount of 105,000 gallons used which will put our bill well over \$1200. This is more water in one month than we've used in a year over the 10 years at this address. We are not alone. We have 100's of people in our service area that are being billed for impossible usage amounts. Carolina Water Service is very aware that 100's of customers have complained about this sudden surge in usage and are doing nothing but blaming consumers for having leaks. We cannot all have leaks. \$2500+ for 4 months of water is what my family is being billed. We've had a plumber and irrigations specialist verify no leaks at our home. For reference, WCNC Charlotte has done two stories on this issue.

<https://www.wcnc.com/article/news/local/mooresville-residents-water-rate-increase/275-79bc21bb-917b-4e69-b7f2-a04ab3d060b0>

<https://www.wcnc.com/article/money/high-water-bills-neighbors-alert/275-ddcc17d3-24f1-48b6-9f49-d42e13ff6abd>

4. We are asking that Carolina Water Service revise all bills to the historical average and be regulated more stringently as they have not stopped the over- billing based on the absurd usage amounts. We further ask that Carolina Water Service be replaced as the water provider for our area if they will not cooperate and stop abusing consumers that have little to no recourse. I look forward to your response.

Thank you,

Don Calhoun

Complainant Exhibit 19 W-354 Sub 414, I/A

- Auto Pay
- Text To Pay
- Payment Arrangement
- History**
- Billing Queries



Bill Date	Bill Amount (\$)	W-354 Sub 414	View Bill
November 6, 2022	815.43		
October 4, 2022	783.71		
September 6, 2022	863.91		
August 3, 2022	650.15		
July 21, 2022	771.04		
June 5, 2022	68.94		
May 3, 2022	121.69		
April 6, 2022	76.51		
March 3, 2022	60.30		
February 3, 2022	62.53		
January 6, 2022	73.12		
December 5, 2021	65.27		
November 3, 2021	81.04		
October 7, 2021	129.80		



Terms & Conditions

Privacy



Apr 20 2023

OFFICIAL COPY



HOME



MY ACCOUNT



BILLING



USAGE



COMPARE



ALERTS



NOTIFICATIONS



CONTACT US



SERVICE



THE VALUE OF WATER

Usage

Meter Number

All



Water

26,345.10 Gal

BILLING PERIOD AVERAGE

105,024.00 Gal

HIGHEST MONTH THIS YEAR

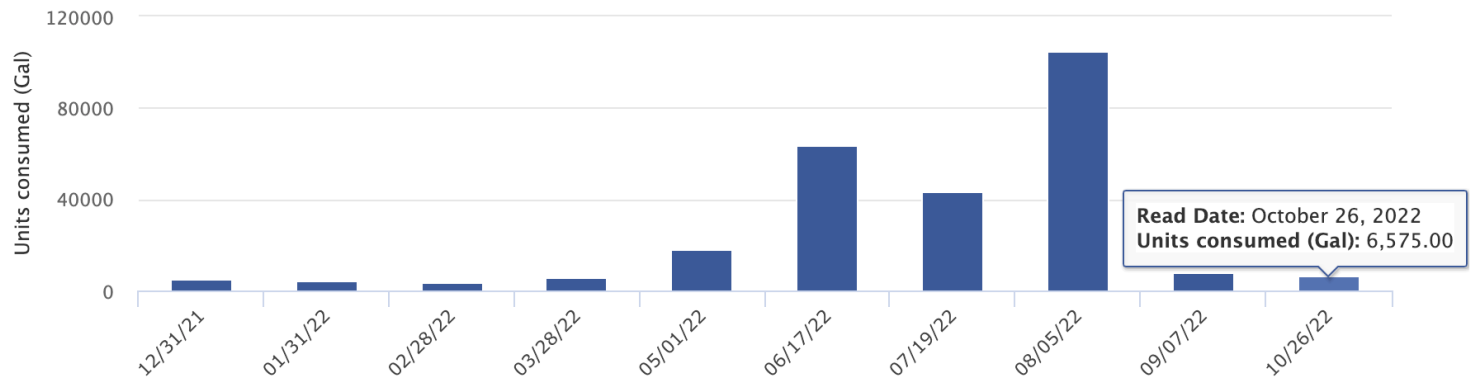


W-354 Sub 414

Period: Dec 2021 To Oct 2022



Billing Period



Export to Excel



Addendum to Calhoun Complaint vs. Carolina Water Service.

W-354 Sub 414

Questions for CWS

- 1.) How many customers in the 28117 service area had bills over \$450 from June 2022 to present?
- 2.) Your representative came out multiple times and multiple times blamed us for a leak, having long showers taken by teenagers (we have none), using 600 gallons between 1-5am while we are sleeping, the pool, the irrigation and internal plumbing. No accountability taken or investigation done on your end.
- 3.) We explained to him multiple times that we have had our irrigation company and plumber inspect both systems and there was no leak.
- 4.) You've also blamed leaks on our neighbors, others in our neighborhood and service area. Again – how many customers in our 28117 service area had bills over \$450??
- 5.) How did we go from usage over 63,000, 43,000, 105,000 gallons to 3200 and 6800 gallons the following 2 months. We changed nothing on our end. You changed meters 4 or 5 times. You first changed a meter after your pipe was leaking in our yard (road to meter) then at least 3 other times. Now that we have a digital meter

with wifi – we can see that our normal usage is being recorded.

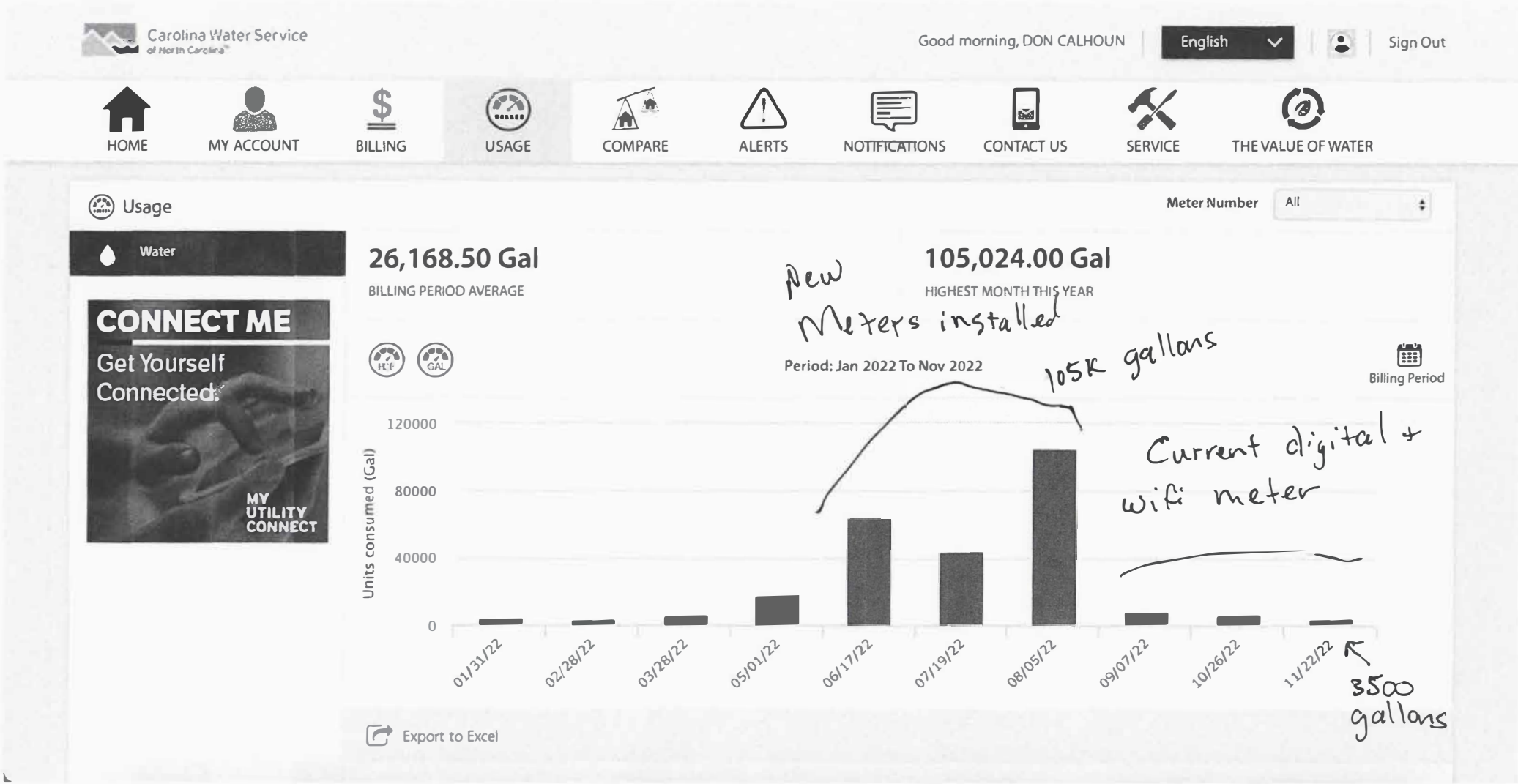
- 6.) You billed our neighbor over \$900, \$1000 and \$800 in the same months. Other neighbors have bills over \$500 in our immediate area – but it is all leaks, right?
- 7.) You have yet to take any responsibility for anything, you blame your customers and hide behind your “data” which only you have. We have HOA presidents of the 3 largest communities in this area that all have issues with your usage and billing.
- 8.) You have no customer service line – you call it customer service but it is a 3rd party collection agency you use that is as rude as possible to customers who call in with a question.



W-354 Sub 414

OFFICIAL COPY

Apr 20 2023



Don Calhoun

SANFORD LAW OFFICE, PLLC

Jo Anne Sanford, Attorney at Law

December 16, 2022

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

Via Electronic Delivery

Re: Docket No. W-354, Sub 414
Carolina Water Service, Inc. of North Carolina
Formal Complaint of Don Calhoun
Answer and Motion to Dismiss Complaint

Dear Ms. Dunston:

On November 7, 2022, Mr. Don Calhoun ("Complainant") filed a formal complaint ("Complaint") in this docket against Carolina Water Service, Inc. of North Carolina ("CWSNC" or "Company"). Attached please find CWSNC's Answer and Motion to Dismiss Complaint.

In a separate filing in this docket, CWSNC is also filing certain exhibits to the Company's Answer and Motion to Dismiss which are deemed to be confidential. The Company's confidential filing consists of eight of the Complainant's water bills which are identified as Denton Affidavit Confidential Exhibits A and B. These water bills are being filed confidentially in order to afford any necessary protection to Mr. Calhoun's personal information.

I hereby certify that a copy of this Answer and Motion to Dismiss Complaint has been electronically served on the Complainant, who is the only other formal party to this proceeding.

Thank you and your staff for your assistance; please feel free to contact me if there are any questions or suggestions.

Sincerely,

Electronically Submitted

/s/Jo Anne Sanford

State Bar No. 6831

Attorney for Carolina Water Service,
Inc. of North Carolina

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. W-354, SUB 414

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Don Calhoun, 393 Bayberry Creek Circle,	)	
Mooreville, North Carolina 28117,	)	
Complainant	)	DEFENDANT'S
	)	ANSWER AND MOTION
v.	)	TO DISMISS COMPLAINT
	)	
Carolina Water Service, Inc. of North Carolina,	)	
Defendant	)	

NOW COMES Carolina Water Service, Inc. of North Carolina (CWSNC, Company, or Defendant) and files this Answer and Motion to Dismiss Complaint in response to the North Carolina Utilities Commission (Commission or NCUC) Order Serving Complaint in this matter, issued on November 8, 2022. In response to the Complaint, CWSNC shows the Commission as follows:

On November 7, 2022, Mr. Don Calhoun (Mr. Calhoun or Complainant), a CWSNC water customer, filed a formal complaint (Complaint) with the Commission challenging, in pertinent part, certain water usage and billing information affecting water bills from CWSNC that he received for water utility service at his property located at 393 Bayberry Creek Circle in Mooreville, North Carolina. On November 30, 2022, Mr. Calhoun filed an addendum to his Complaint.

More specifically, in Paragraphs 3 and 4 of his Complaint, the Complainant alleged and asserted, in pertinent part, that:

3. My complaint concerns Carolina Water Service of North Carolina and their water usage and billing information. We have lived at the same residence for 10 years. In July of 2020, Carolina Water Service billed us \$71.00 for using 5,170 gallons. In July of 2021 Carolina Water Service billed us \$177.67 for using 18,030 gallons. In June of 2022 we were billed \$68 for using 4,700 gallons. In July of 2022 that number jumped to \$771.04 claiming usage of 63,750 gallons of water. In August of 2022 we were billed \$650.19 for using 43,090 gallons. In September we were billed \$409.94 for using 35,008 gallons. Our current usage per www.myutilityconnect.com shows an absurd amount of 105,000 gallons used which will put our bill well over \$1200. This is more water in one month than we've used in a year over the 10 years at this address. We are not alone. We have 100's of people in our service area that are being billed for impossible usage amounts. Carolina Water Service is very aware that 100's of customers have complained about this sudden surge in usage and are doing nothing but blaming consumers for having leaks. We cannot all have leaks. \$2500+ for 4 months of water is what my family is being billed. We've had a plumber and irrigations specialist verify no leaks at our home. For reference, WCNC Charlotte has done two stories on this issue. [Links deleted from original]
4. We are asking that Carolina Water Service revise all bills to the historical average and be regulated more stringently as they have not stopped the over-billing based on the absurd usage amounts. We further ask that Carolina Water Service be replaced as the water provider for our area if they will not cooperate and stop abusing consumers that have little to no recourse. I look forward to your response

On November 8, 2022, the Commission entered an Order Serving Complaint in this docket whereby Mr. Calhoun's formal complaint was served on CWSNC and the Company was directed to either satisfy the demands of the Complainant or file an answer with the Commission on or before November 18, 2022. On November 15, 2022, CWSNC filed a request for an extension of time until Friday, December 16, 2022, to file the Company's response to the complaint. By Order dated November 16, 2022, the Commission granted the requested extension of time.

CWSNC's Answer to Mr. Calhoun's Complaint

CWSNC hereby files the attached Affidavit of Donald H. Denton III, as its Answer in response to Mr. Calhoun's Complaint and addendum thereto. Mr. Denton is Senior Vice President, East Operations for Corix Regulated Utilities (CRU). In that capacity, he oversees the operations of CWSNC, Blue Granite Water Company (BGWG) in South Carolina, and Sunshine Water Services in Florida, all of which are subsidiaries of CRU. In addition, Mr. Denton serves as President of CWSNC and BGWC.

CWSNC has conducted a diligent investigation of the matters raised by the Complainant and Mr. Denton's Affidavit constitutes the Company's comprehensive response.

The primary complaint registered by Mr. Calhoun relates to three bills for water utility service which he received from CWSNC during the service period extending from May 18, 2022, through August 16, 2022. The Complainant alleges that he was overbilled by CWSNC during this period based on what he called "...absurd billing amounts...." He further asserts that he "...had a plumber and irrigations specialist verify no leaks at our home...."

Based upon the results of an extensive investigation conducted by CWSNC (as documented and detailed in the Denton affidavit), the Company asserts that the Complainant was properly billed for the water utility service which he received during the three billing periods in question which extended from May 18, 2022, through August 16, 2022. This conclusion is supported by the installation of four meters at the Complainant's home using three different technologies (analog,

Automated Metering Infrastructure (AMI), and Automatic Meter Reading (AMR)) to ensure accurate tracking of water usage; successful independent meter tests; a third-party audit of the Company's billing and meter reading practices which confirmed that CWSNC's practices are consistent with routine operations and billing standards of other utilities; multiple field visits by CWSNC staff to the Complainant's property to observe meter operations, search for possible leaks near the meter, and offers to work with Mr. Calhoun to explore potential leaks on the property; and Company responses to two Public Staff informal complaints and one Better Business Bureau complaint filed by Mr. Calhoun, which were all closed with no adverse action having been taken against CWSNC.

In addition, CWSNC asserts that it is likely that each of the following factors contributed to higher water usage and higher water bills at Mr. Calhoun's property during the three billing periods in question: a higher historic summer water usage pattern by the Complainant; possible leaks or malfunctioning equipment on the Complainant's property, including an irrigation system and inground swimming pool; increases in the rates and changes to the volumetric component of rates charged by CWSNC (as approved by the North Carolina Utilities Commission in the Company's Sub 384 general rate case) implemented in the April/May 2020 timeframe; and installation by the Complainant of a new inground pool completed in the fall of 2021.

CWSNC also contends that the Company has been more than fair to Mr. Calhoun by providing him with a very significant good faith, complimentary \$650 billing adjustment in August 2022, particularly in consideration of the

Company's firmly-held position that Mr. Calhoun's high water usage and related charges for the three billing months in question are accurate.

CWSNC has demonstrated that the water usage registered on Mr. Calhoun's three bills for utility service received during the period from May 18, 2022, through August 16, 2022, in the unpaid dollar amount of \$713.91, is correct. Accordingly, CWSNC maintains that no further billing adjustment is warranted or required in this case and requests that Mr. Calhoun be ordered by the Commission to pay his outstanding water bill in the amount of \$713.91 to the Company.

CWSNC's Motion to Dismiss Mr. Calhoun's Complaint

G.S. 62-73 provides, in pertinent part, that:

Complaints may be made by...any person having an interest, either direct or as a representative of any persons having a direct interest in the subject matter of such complaint by petition or complaint in writing **setting forth any act or thing done or omitted to be done by any public utility, including any rule, regulation or rate heretofore established or fixed by or for any public utility in violation of any provision of law or of any order or rule of the Commission, or that any rate, service, classification, rule, regulation or practice is unjust and unreasonable....** (Emphasis added)

In support of this Motion to Dismiss Complaint, CWSNC asserts that the Complainant has not demonstrated that the Company has violated any of the statutory language in G.S. 62-73 highlighted above to substantiate a finding by the Commission that reasonable ground exists for further investigation of the Complaint at issue in this docket. The Affidavit of Donald H. Denton III is dispositive on that point in terms of the verified facts supplied by the Company in support of its position that the Company bears no responsibility for the "over-billing"

and “absurd usage amounts” alleged and complained of by Mr. Calhoun. CWSNC conducted multiple investigations beginning in May 2022 and continuing to-date to determine if there was any validity to the claims made by the Complainant. The Company is convinced, and has so told the Complainant, that the high bills and high usage about which he has complained resulted from actual usage and potential leaks or possible equipment malfunctions on his property.

Accordingly, CWSNC respectfully asserts that no reasonable ground exists pursuant to G.S. 62-73 for the Commission to further investigate Mr. Calhoun’s Complaint and that his Complaint should, therefore, be dismissed. Accordingly, CWSNC requests that the Commission, based upon its independent review of the Complaint and the Company’s Answer, enter an Order finding no reasonable ground for further investigation and provide Mr. Calhoun notice and opportunity to be heard on that conclusion, as required by G.S. 62-73. Thereafter, if Mr. Calhoun, by his written response, is unable to demonstrate to the satisfaction of the Commission that reasonable ground does in fact exist to continue with an investigation, CWSNC requests that the Commission enter an Order dismissing the Complaint and closing this docket premised on a finding that the Complainant has failed to state a claim upon which relief can be granted.

The Commission has utilized the “no reasonable ground” procedure in many complaint cases in the past and CWSNC asserts that such a disposition is clearly applicable, reasonable, fair, efficient, and justifiable in this particular case. In addition, CWSNC asserts that this is precisely the type of case where it is reasonable and appropriate for the Commission to conclude, after review of the

pleadings, that no reasonable ground exists pursuant to G.S. 62-73 for further investigation.

Based upon the foregoing, CWSNC asserts that no compelling reason exists for any further adjustment of the water charges billed to Complainant for services he in fact received during 2022. Furthermore, there is no basis for the Commission to order, as requested by the Complainant, that CWSNC be replaced as the water provider for Mr. Calhoun's community.

Accordingly, the Company respectfully submits that this case can most efficiently and fairly be decided based upon the pleadings submitted by the parties. The Complainant, not CWSNC, bears the burden of proof in this proceeding. Mr. Calhoun should be held to that standard and should be ordered by the Commission to demonstrate and show that reasonable ground in fact exists for the Commission to proceed with further investigation of his Complaint.

Respectfully submitted this the 16th day of December, 2022.

**ATTORNEYS FOR CAROLINA WATER SERVICE,
INC. OF NORTH CAROLINA
Electronically Submitted**

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STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. W-354, SUB 414

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Don Calhoun, 393 Bayberry Creek Circle,	)	
Mooreville, North Carolina 28117,	)	
Complainant	)	DEFENDANT'S
	)	ANSWER AND MOTION
v.	)	TO DISMISS COMPLAINT
	)	
Carolina Water Service, Inc. of North Carolina,	)	
Defendant	)	

**AFFIDAVIT OF DONALD H. DENTON III
PRESIDENT OF
CAROLINA WATER SERVICE, INC. OF NORTH CAROLINA**

Donald H. Denton III, President of Carolina Water Service, Inc. of North Carolina ("CWSNC" or "Company"), first being duly sworn, deposes and says:

1. On November 7, 2022, Don Calhoun (Mr. Calhoun or Complainant), a CWSNC water customer, filed a formal complaint (Complaint) with the North Carolina Utilities Commission (Commission or NCUC) challenging, in pertinent part, certain water usage and billing information affecting water bills from CWSNC that he received for water utility service at his property located at 393 Bayberry Creek Circle in Mooreville, North Carolina. On November 30, 2022, Mr. Calhoun filed an addendum to his Complaint.

2. On November 8, 2022, the Commission entered an Order Serving Complaint in this docket whereby Mr. Calhoun's formal complaint was served on CWSNC and the Company was directed to either satisfy the demands of

Complainant or file an answer with the Commission on or before November 18, 2022. On November 15, 2022, CWSNC filed a request for an extension of time until Friday, December 16, 2022, to file the Company's response to the complaint. By Order dated November 16, 2022, the Commission granted the requested extension of time.

3. The verified information set forth in this Affidavit constitutes CWSNC's Answer to Mr. Calhoun's Complaint and provides verification and support for the Company's Answer and Motion to Dismiss Complaint.

4. The primary complaint registered by Mr. Calhoun relates to three bills for water utility service¹ which he received from CWSNC during the service period extending from May 18, 2022, through August 16, 2022. The Complainant alleges that he was overbilled by CWSNC during this period based on what he called "...absurd billing amounts...." He further asserts that he "...had a plumber and irrigations specialist verify no leaks at our home...."

5. By the first contested bill, Complainant was billed a total of \$771.04 for 83,750 gallons of water used during the period from May 18, 2022, through June 17, 2022. By the second bill at issue, Complainant was billed \$529.11 for 43,090 gallons of water used during the period from June 17, 2022, through July 19, 2022. By the third disputed bill, Complainant was billed \$434.47 for 35,008 gallons of water used during the period from July 19, 2022, through August 16, 2022.

¹ The three water bills in question are further discussed in Paragraph 5 of this Affidavit and are attached hereto and collectively identified as Denton Affidavit Confidential Exhibit A. These bills are being filed confidentially in order to afford any necessary protection to Mr. Calhoun's personal information.

6. Based upon the results of an extensive investigation conducted by CWSNC (as documented and detailed below), the Company asserts that the Complainant was properly billed for the water utility service which he received during the three billing periods in question which extended from May 18, 2022, through August 16, 2022. This conclusion is supported by the installation of four meters at the Complainant's home using three different technologies (analog, Automated Metering Infrastructure (AMI), and Automated Meter Reading (AMR)) to ensure accurate tracking of water usage; successful independent meter tests; a third-party audit of the Company's billing and meter reading practices which confirmed that CWSNC's practices are consistent with routine operations and billing standards of other utilities;² multiple field visits by CWSNC staff to the Complainant's property to observe meter operations, search for possible leaks near the meter, and offers to work with Mr. Calhoun to explore potential leaks on the property; and Company responses to two Public Staff informal complaints³ and one Better Business Bureau complaint⁴ filed by Mr. Calhoun, which were all closed with no adverse action having been taken against CWSNC.

7. In addition, CWSNC asserts that it is likely that each of the following factors contributed to higher water usage and higher water bills at Mr. Calhoun's

² See Denton Affidavit Exhibit 1.

³ On November 21, 2022, CWSNC's counsel emailed the Public Staff with the following public records request: "CWSNC is working on its answer to the Sub 414 Don Calhoun formal complaint. Could you please send us a copy of all written correspondence between the Staff and Mr. Calhoun as well as any documents in your possession generated by either Mr. Calhoun or the Staff which are relevant to this matter, including the Staff's conclusions regarding the merits or validity of the complaint."

On December 2, 2022, counsel for the Public Staff responded by email stating: "Attached is the information responsive to you (sic) public records request."

The document supplied by the Public Staff is attached hereto as Denton Affidavit Exhibit 2.

⁴ See Denton Affidavit Exhibit 3.

property during the three billing periods in particular: a higher historic summer water usage pattern by the Complainant; possible leaks or malfunctioning equipment on the Complainant's property, including an irrigation system and inground pool equipment; increases in the rates and changes to the volumetric component of rates charged by CWSNC (as approved by the North Carolina Utilities Commission in the Company's Sub 384 general rate case) implemented in the April/May 2020 timeframe; and installation by the Complainant of a new inground pool⁵ completed in the fall of 2021.

8. According to Iredell County tax records, the Complainant's home is 4,835 square feet with six bathrooms.⁶ Based on observations by CWSNC field personnel, the Complainant also has an extensive irrigation system and inground pool on his property.

9. On May 18, 2022, the Complainant contacted the Company to report a water leak near the meter on his property. On that same day, a field operator responded to the home and determined that the water leak was on CWSNC's side of the water meter. He noted that the meter box had settled or had been moved so that the service line entering the box was pulled partially out. Since it was possible that the meter itself was the source of the leak, the equipment was replaced.

10. Each water meter has a unique identification badge number. The initial Badger brand analog meter that was removed and replaced by CWSNC on May 18, 2022, carried badge number 43582896. A second Badger analog meter

⁵ See Denton Affidavit Exhibit 4.

⁶ See Denton Affidavit Exhibit 4.

(badge number 220745442) was installed at the property so that the initial meter could be sent for testing to ensure accurate operations.

11. In a report dated August 5, 2022, Mid-America Meter, Inc., an outside, third-party testing company, shared its testing results with CWSNC stating that meter number 43582896 performed with 100.45% accuracy.⁷ The testing result for meter number 43582896 indicated that the meter complied with North Carolina Utilities Commission accuracy requirements as detailed in NCUC Rule R7-29 that meters must test within a range of 2% fast or slow. In addition, the test results were also within the standards and tolerance levels of 98.5% to 101.5% established by the American Water Works Association, an international, non-profit scientific and education society dedicated to ensuring the effective management of water.

12. Although CWSNC's field operator thought that the water leak initially complained of by Mr. Calhoun on May 18th had been corrected by the meter replacement, that was, apparently and unfortunately not the case. Between May 19 and May 24, 2022, Mr. Calhoun contacted the CWSNC's customer service team several times to report that the water leak on the Company's side of the meter was ongoing. The Company placed a work order with a vendor to assess the situation.

13. On May 20, 2022, Aqua Services, Inc., a vendor that delivers maintenance services on behalf of CWSNC, visited Complainant's property and adjusted a connection between the line and the meter, stopping the leak at least

⁷ See Denton Affidavit Exhibit 5.

temporarily. The representative of Aqua Services, Inc. spoke with Mr. Calhoun and requested permission to excavate a portion of the lawn to extend line in order to allow for a more comprehensive repair, but Complainant did not agree to allow that work to proceed.

14. On June 9, 2022, Mr. Calhoun again contacted customer service to report that the leak on the Company's side of the meter was continuing. A CWSNC representative spoke with the Complainant and explained that the repair would require excavation of a portion of his lawn. This time Mr. Calhoun agreed to the work. The next day, on June 10, 2022, Aqua Services, Inc. excavated a portion of the lawn and performed the repair, extending the service line to allow more room for ground movement.

15. Because the leaks repaired in May and June were on the Company's side of the meter, and not on the Complainant's side of the meter, the usage caused by the leaks did not register on the Complainant's account and Mr. Calhoun was not incorrectly billed for that water.

16. As a matter of due diligence and in order to be fully responsive to the Complainant's concerns, the Company continued to closely monitor the meter at Mr. Calhoun's property. On July 19, 2022, a field technician visited Mr. Calhoun's home to read the meter and ensure the meter was operating properly and to look in the immediate area for leaks. Upon examination, the meter appeared to be performing appropriately and no leaks were observed.

17. On August 1, 2022, the Complainant contacted Corix, the parent company of CWSNC, at its offices in Chicago by telephone and email, asking for

contact information for the operations leader in North Carolina and to express his concerns about high bills and water usage. An email from the Complainant was routed to me, as CWSNC's President. I called Mr. Calhoun, who reiterated his concerns during the conversation.

18. On August 2, 2022, a field technician visited Complainant's property to read the meter and check for leaks near that equipment. No leaks were apparent, and the meter appeared to be functioning properly. Based on the data gathered, the CWSNC field technician determined that approximately 25,000 gallons of water, an average of 1,800 gallons a day, had passed through the Complainant's meter in the past 14 days since the meter had last been read on July 19, 2022. The technician shared that information about high usage with Mr. Calhoun. The Company's technician also reported that he noticed an extensive irrigation system and inground pool at Mr. Calhoun's premises and that he spoke with the Complainant about potential high-water usage from those sources, as well as possible leaks.

19. In an August 2, 2022 email exchange, Mr. Calhoun first disputed the amount of his bill dated July 21, 2022, for the billing period from May 16, 2022, through June 17, 2022, which showed 63,070 gallons of water used and a billing cost of \$771.04. The Company reviewed Mr. Calhoun's average bill for the previous 12 months, compared that to the current bill, and provided the Complainant with a courtesy billing credit of \$650 to align it with his historic average usage.⁸

⁸ On August 4, 2022, Mr. Calhoun contacted the Company by email and me via my cell phone to inquire about the status of the \$650 reimbursement posting to his account. Deb Clark,

20. A review of the billing history at the Complaint's property shows a pattern of higher water usage during the late-spring and summer months as compared to the other months of the year, with even greater increases in the months of May through August of 2022. For instance, during 2021,⁹ the Complainant used 14,500 gallons of water during the billing period from April 25, 2021, through May 26, 2021; 18,030 gallons during the period from May 26, 2021, through June 26, 2021; 22,090 gallons during the period from June 26, 2021, through July 21, 2021; 20,600 gallons during the period from July 21, 2021, through August 27, 2021; and 12,230 gallons during the period from August 27, 2021, through September 26, 2021.

21. The Complainant is not alone among his neighbors (who are also water customers of CWSNC) in having higher usage in the late-spring and summer. The Company serves The Farms, where the Complainant resides, and The Point and The Harbour neighborhoods through an integrated water system that uses the same wells and infrastructure. Analysis performed by the Company illustrates the dramatic increase in usage in those neighborhoods in the late-spring and summer versus the winter.¹⁰

22. On August 5, 2022, CWSNC operations leader and area manager Kenny Knopf visited Mr. Calhoun's residence to read the Badger meter (badge number 220745442) which had been installed on May 18, 2022. Mr. Knopf

Communication and Community Engagement Manager, replied by email, sharing a screenshot of the Company's billing system, illustrating that the amount of \$650 had been credited to Complainant's account.

⁹ The five referenced water bills in question are attached hereto and collectively identified as Denton Affidavit Confidential Exhibit B. These bills are being filed confidentially in order to afford any necessary and appropriate protection to Mr. Calhoun's personal information.

¹⁰ See Denton Affidavit Exhibit 6.

removed the meter and replaced it with a new digital Neptune brand meter (badge number 11502145) designed to measure water usage every hour. The Neptune meter is an AMI technology which is designed to track water usage and automatically and securely transmit that data to CWSNC via a cellular network. The data collected by the AMI meter is more detailed than traditional analog meters and the Company hoped that tracking usage hourly might provide more clues on how and when water was being used by the Complainant.

23. In a report dated August 10, 2022, Mid-America Meter, Inc. provided the Company with its assessment of the second Badger meter, badge number 220745442, noting that it had also operated properly, testing 100.04% accurate and within NCUC standards.¹¹ In addition, the test results were also within the standards and tolerance levels of 98.5% to 101.5% established by the American Water Works Association.

24. On August 9, 2022, a field technician visited the Complainant's home to read the newly-installed AMI meter. The Neptune brand AMI meter was operating, but not completing a secondary function of transmitting data via a cell signal back to the Company. Upon investigation, the Company discovered that a poor cell signal in the area was to blame. When the meter was moved to a location with a better signal, it transmitted data that it had stored, transmitting it electronically as designed.

25. Also, on August 9, 2022, the Complainant emailed the Company stating that his account still showed charges totaling \$650, wondering if that was

¹¹ See Denton Affidavit Exhibit 7.

the balance that was supposed to be adjusted. The Company confirmed that the credit had been made and that the figure he was seeing now represented the new balance for his account and the most recent usage reflected on his bill dated August 3, 2022, for service rendered between June 17, 2022, through July 19, 2022. Mr. Calhoun replied that he was going to file a complaint with the Commission and contact Company leadership again. He stated: "I can't believe that you are still pushing a \$650 bill when we just went through all this and we are obviously being overcharged."

26. On August 9, 2022, Mr. Calhoun emailed the Public Staff, stating, in pertinent part: "Carolina Water Service of NC has overbilled us for 2 straight months and won't adjust their billing. They are also overbilling my neighbor and others in the neighborhood. Our normal bill for 10 years at this residence has been \$60-\$100. They installed a new meter and then started charging us over \$700." The Public Staff assigned case number 196302 to the matter and alerted the Company requesting a response. CWSNC replied on the same day, August 9, 2022, providing a formal response to the Public Staff, including a summary of the Company's actions to address the Complainant's concerns, the report dated August 5, 2022, capturing meter test results, and the customer's billing history. On August 9, 2022, a Public Staff representative contacted the Complainant via email sharing the meter test report and stated that the equipment functioned with 100.45% accuracy.

On August 12, 2022, a field technician visited the property, read the meter and checked for leaks in the vicinity of the Company's equipment. The technician

noted high usage of 9,139 gallons of usage in the past seven days and shared that information with Mrs. Calhoun. On the same day, the meter was removed and replaced with a second Neptune meter (badge number 11502157).

On August 13, 2022, I emailed Mr. Calhoun with a comprehensive update on the Company's efforts to investigate his claims. A substantive excerpt from that email follows:

...Based on the data, water is passing through the meter to your property at a rate higher than your historical average. Over the past couple of months, we have installed two new meters (one analog and one digital) and tested the meters that have been removed for accuracy. Both of those independent meter testing reports indicated the meters were operating properly and within tolerance.

A new mechanical meter was installed by our team on 5/18/22 and utilized until 8/5/22. During this period, 132,210 gallons of water passed through the meter - or an average of 1,673 gallons per day.

A new Mach 10 digital meter was installed on 8/5/22 and on 8/12/22 it had a reading of 9,139.2 gallons, or an average of 1,305.6 gallons per day.

I understand you have indicated that you do not have a leak, but water has flowed to your property at the rates indicated above. We would like to help by providing the hourly consumption data that the new digital meter is tracking so that you may be able to determine the source of the consumption. We will be able to start providing that data this week.

27. On August 16, 2022, Mr. Calhoun emailed the Public Staff to restate his claims of being overcharged for water. In addition, he added:

...This isn't just the water rate increase, there is an issue either with their meters or how they are calculating usage. The company continues to bill and maintain the billing is fair....¹²

¹² See Denton Affidavit Exhibit 2.

28. On August 16, 2022, the Public Staff replied, in pertinent part, as follows:

...Based on the information provided by the utility company, a meter test was performed on August 5, 2022, and the meter is registering at 100.45%, which is within the guidelines of the North Carolina Utilities Commission. Upon the utility company receiving the work order to test your meter, the field operator noted that a swimming pool and irrigation system is at the home, which could possibly be a reason for the high usage. In reviewing your readings, they appear to be higher during the summer months of June, July, and August during 2018, 2019, and 2021. In addition, Carolina Water Service has provided a courtesy adjustment of \$650.00; and unfortunately, no additional adjustments will be warranted....¹³

29. On August 27, 2022, Mr. Knopf and a representative from Core & Main, a company that sells AMI and AMR meters, visited Mr. Calhoun's property to assess the equipment and ensure correct set up.

30. On September 1, 2022, the Better Business Bureau (BBB) notified CWSNC that Mr. Calhoun had filed a complaint against the Company (identified as case #17654339). The complaint stated, in pertinent part:

This water utility overbills and leaves no recourse for customers as they send all issues to a third party collection agency....¹⁴

The Company replied to the BBB with information substantially similar to its response to Mr. Calhoun's first complaint to the Public Staff. On September 3, 2022, the BBB notified the Company that it closed the Calhoun case,¹⁵ stating, in pertinent part:

We forwarded your response to Don Calhoun. Unfortunately, the consumer notified our office that they are not satisfied. The BBB has determined your company has addressed the issues within the complaint; therefore we have closed this case in our files....

¹³ See Denton Affidavit Exhibit 2.

¹⁴ See Denton Affidavit Exhibit 3.

¹⁵ See Denton Affidavit Exhibit 3.

31. On September 1, 2022, the Public Staff notified the Company of a second complaint filed by Mr. Calhoun. The Company provided its written response via email on September 13, 2022. Much like CWSNC's initial August response, the Company provided updated details on its efforts to address Mr. Calhoun's concerns, including the customer's latest account information and the results of the second meter test.

32. On September 7, 2022, Mr. Knopf installed a Mach 10® ultrasonic meter (badge number 13444812) at the Complainant's property. That meter utilized AMR technology that, unlike AMI, does not rely on a cell signal to transmit data. Instead, data is captured by the meter and collected electronically by a utility worker using a device in proximity of the equipment.

33. The Neptune AMI meters that were previously installed at the Complainant's property captured hourly usage information. During the same visit on September 7, 2022, Mr. Knopf shared with the Complainant the data retrieved from one of those meters. Specifically, the meter logged very high usage during the 1:00 a.m., 2:00 a.m., 6:00 a.m. and 7:00 a.m. hours on August 10 and August 12. Company personnel believed that might indicate a malfunction in pool or irrigation equipment which was programmed to operate at a certain time. Mr. Knopf shared the information with Mr. Calhoun who disagreed, indicating that he did not believe that was the case. The same phenomenon of very high usage during the 1:00 a.m., 2:00 a.m., 6:00 a.m. and 7:00 a.m. hours repeated on October 19th on the AMR digital meter.¹⁶

¹⁶ See Denton Affidavit Exhibit 8.

34. On October 3, 2022, Mr. Calhoun emailed Mr. Denton stating:

Our current meter is reading around 2,700 gallons for 3 weeks of usage. Our last usage states 105,000 gallons. Since it's obvious this is not an issue of our home - it's widespread - can we just get our historic average bills sent to us so we can end this? I really don't want to keep going back/forth and filing a formal complaint with the commission, etc.

On October 6, 2022, I replied via email as follows:

After investigating your account dating back to April usage and the May of 2022 billing period, I will attempt to explain our findings in hopes to bring some clarity and a better understanding of all the factual data present to date. It is important to note that there was a rate increase and adjustment to the volumetric component of the tariff granted by the North Carolina Utilities Commission during this time frame which played a key part in the increases in your bill. The new base rate is \$24.53 per month and the usage charge is \$ 11.71 per thousand gallons.

- In May you received a bill based on water usage of **8,940 gallons** of water used. Also, during the month of April/ May time frame CWSNC was granted a rate increase from the North Carolina Utilities Commission. The bill would have been prorated as follows.
2629 gallons of water at a rate of \$8.27 per thousand gallons + base rate \$8.51 + \$.031(water system improvement charge) - .09 (tax credit) = \$30.47 The bill was prorated from 3/29 through 4/7 due to the newly granted increase in rates.
6311 gallons of water at a rate of \$11.71 per thousand gallons + base rate \$17.32 = \$91.22. The bill was prorated from 4/8 through 5/1 due to the newly granted increase in rates.
Total bill for the month of April = \$121.69
- In June you received a bill based on **4700 gallons** of water usage at the new usage rate.
4700 gallons at \$11.71 per thousand gallons = \$55.04 + prorated base rate of \$13.90 per month.
Total bill = \$ 68.94
- In July you received a bill based on **63,750 gallons** of water usage at the new usage and base rate.
63,750 gallons at \$11.71 per thousand gallons = \$746.51 + full approved base rate of \$24.53
Total bill = \$ 771.04

- In August you received a bill based on **43,090 gallons** of usage which would be billed at the new rate. 43,090 gallons at \$11.71 per thousand gallons = \$504.58 + base rate of \$ 24.53.
Total bill = \$529.11

In addition, CWSNC issued a one-time credit in the amount of \$650.00 based on the July bill which left a customer balance of \$121.04

$529.11 + 121.04 \text{ balance} = \$ 650.15$

- In September you received a bill based **35,008 gallons** of water usage which is billed at the new rate. 35,008 gallons at \$11.71 per thousand gallons = \$409.94 + base rate of \$ 24.53 = \$434.47
CWSNC received a customer payment in the amount of \$220.71 from the \$650.15 amount that was due in August = \$429.44 still outstanding + 434.47 September bill = \$ 863.91

In addition to the above, our CWSNC operations team has replaced the water meter at your residence several times to ensure the water meter at your residence is capturing the correct amount of flow. The old water meters that were replaced were sent off to be tested by an independent testing company and found to be within tolerance with NCUC rules and regulations. Based on the information we have, the consumption data appears accurate, and we still believe you have an intermittent leak. In that vein, we will offer an additional \$650 credit to your account.”

As noted above, I offered the customer an additional \$650 billing credit.

Because Mr. Calhoun did not provide a clear response to the Company, a second billing credit was not made to his account.

35. As previously stated in this Affidavit, in August 2022, three separate water meters were operating at the Complainant's property at different times as part of the Company's inquiry into Mr. Calhoun's concerns, which is a highly unusual circumstance. The Complainant's exhibits in this matter contain screen shots from the "My Utility Connect" (MUC) website, a third-party vendor operated tool that allows customers to view information related to their account. One exhibit

captures a query from the “usage” section of the tool. When given the choice of selecting a specific meter or “all” meters, the option of “all” meters was selected by Mr. Calhoun. The query gathered data from the three meters operating during that month and arrived at 105,024 gallons of usage for the August timeframe. That is exactly three times the actual usage of 35,008 gallons that was billed in September by the Company to Mr. Calhoun’s account for water service.

Mr. Calhoun’s second exhibit is a screen shot from the “billing” section of MUC. The pdf file of the September 6, 2022 bill accurately captures usage and other information from each of the three August meters, totaling 35,008 gallons of usage. The Company maintains that it accurately billed Mr. Calhoun and that this appears to be an anomaly in the “usage” section of the third-party MUC tool. CWSNC has alerted the vendor to the issue and apologizes to Mr. Calhoun for the inconvenience.

36. In the Fall of 2022, the Company, in response to the concerns expressed by Mr. Calhoun and in order to ensure that the issues raised in his Complaint were not global in nature, commissioned a professional, third-party audit by Cavanaugh & Associates, P.A. of “...the current billing processes as performed by staff of Carolina Water Service of North Carolina (CWS). Additionally, a sample of customer meter records were reviewed for The Harbour, The Point and The Farms potable water systems....”¹⁷ The cost of the audit was \$25,600. The results, captured in a Technical Memorandum, received by CWSNC in October 2022, provided the following conclusion:

¹⁷ See Denton Affidavit Exhibit 2.

water systems. The items noted above in the review and sampling appear consistent with routine operations and billing standards Cavanaugh has observed during similar analysis for Utilities nationally.

37. While CWSNC has been addressing Mr. Calhoun's concerns, he has continued to use water at his property, but has elected to pay only a portion of his July, August, and September bills which reflect usage encompassing the billing period from May 18, 2022, through August 16, 2022. As of the date of this Affidavit, Mr. Calhoun's account continues to be \$713.91 in arrears. The Company sent Mr. Calhoun letters on October 3, 2022, and October 31, 2022, informing him of his delinquent billing status, detailing payment options, and indicating that disconnection was possible.

On November 18, 2022, the Complainant emailed the Company stating that he had received a notice that his water service would be disconnected. In response, the Company assured him that his service would not be disconnected for nonpayment of the disputed billing amount while the issue is being litigated before the Commission. Unfortunately, on December 11th, Mr. Calhoun emailed a Company representative stating that "We just received another notice that the water will be shut off. As a reminder, a formal complaint is in process with the commission." This automated disconnection notice was erroneously sent by the Company and action has again been taken to ensure that disconnection will not occur during pendency of Mr. Calhoun's NCUC complaint case. The Complainant was so advised by email dated, December 12, 2022. The Company apologizes to the Complainant and the Commission for this confusion.

38. On September 20, 2022, Mr. Calhoun again contacted the Public Staff via email. A notation was made in the Public Staff's tracking system that this was a "duplicate of case 196594; closing." On November 3, 2022, the Complainant notified the Public Staff that he was not happy with the outcome of his informal complaint against the Company and that he wished to file a formal complaint with the Commission. Mr. Calhoun subsequently filed his Complaint with the Commission on November 7, 2022.

Final Position of the Company Regarding the Don Calhoun Formal Complaint

CWSNC contends that the Complainant owes the Company the amount \$713.91 for water utility service which he received from the Company during the billing period from May 18, 2022, through August 16, 2022. CWSNC has been entirely reasonable in its prior interactions with the Complainant since its first encounter with Mr. Calhoun on May 18th of this year when a Company representative went to the Calhoun property to investigate a reported leak. The Company has continued to act in good faith in all subsequent interactions with the Complainant and has thoroughly investigated and responded to all allegations set forth by Mr. Calhoun in this complaint proceeding.

In addition, CWSNC made a very significant \$650 billing adjustment in Mr. Calhoun's favor in August 2022. CWSNC made that good faith billing adjustment to the benefit of Mr. Calhoun notwithstanding that (a) multiple investigations by Company personnel showed no leaks related to the utility's water meters serving the Complainant; (b) meter testing showed no irregularities with any of the meters serving the Complainant's premises which would account for

inaccurate or faulty, high-meter reads; and (c) there is no indication of any mis-billing by the Company related to the Complainant's account. Furthermore, leakage on the customer's premises is the responsibility of the customer. In that regard, it is possible that that Complainant may have been the victim of undiscovered leakage or malfunction related to his irrigation system or some component of his inground pool during the three billing periods in question.

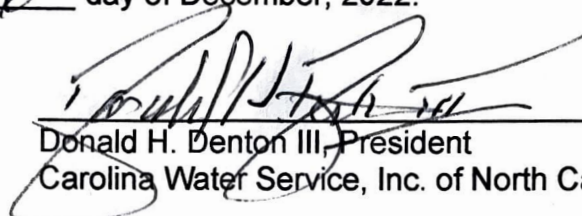
Based on the facts set forth in this Affidavit and the attached Exhibits, CWSNC is unwilling to make further financial accommodations to the Complainant based upon unsubstantiated high-bill claims, particularly for possible leakage on the Complainant's premises which are not the fault of the Company. Accordingly, CWSNC has determined that the water usage registered on the customer's three bills in question for water utility service received during the period from May 18, 2022, through August 16, 2022, in the unpaid dollar amount of \$713.91, is correct and that no further billing adjustment is warranted or required.

Nor is there any basis for the Commission to grant Mr. Calhoun's request that CWSNC be replaced as the water provider for his service area. That request is totally without merit. Furthermore, CWSNC objects to Mr. Calhoun's claims that the Company is uncooperative, that it abuses its customers, and that its customers have little to no recourse. Such allegations cannot be and have not been substantiated by Mr. Calhoun in this complaint proceeding. Mr. Calhoun is a valued customer of CWSNC and will always be treated as such by the Company and its employees.

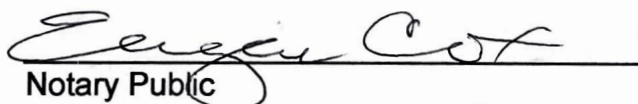
CWSNC is open to continued dialogue with Mr. Calhoun to explain the meter usage, billing, and leak detection aspects of this situation. CWSNC's Customer Experience Center is also available to answer any questions customers such as Mr. Calhoun may have concerning service issues related to their water (and sewer) utility service, as well as the rates for such service and billing issues. The Customer Service Center can be contacted via telephone at (800) 525-7990 or, via email, at customerservice@carolinawaterservicenc.com.

FURTHER AFFIANT SAYETH NOT.

This the 16th day of December, 2022.


Donald H. Denton III, President
Carolina Water Service, Inc. of North Carolina

Sworn and subscribed before me this 16 day of December 2022.

 (SEAL)
Notary Public

My Commission Expires: 10/25/26

EUGENE COX
NOTARY PUBLIC
Brunswick County
North Carolina
My Commission Expires Oct. 25, 2026



TECHNICAL MEMORANDUM

Carolina Water Service of North Carolina

Customer Meter Review and Billing Process Confirmation – The Harbour/The Point/The Farms

PREPARED FOR:	Carolina Water Service of NC	DATE:	October 2022
PREPARED BY:	Cavanaugh	PROJECT NUMBER:	WE.22.010
PROJECT DIRECTOR:	Tory Wagoner, P.E.	PROJECT TEAM:	Tracy Thomasson

Objective Statement

Cavanaugh conducted a review of the current billing processes as performed by staff of Carolina Water Service of North Carolina (CWS). Additionally, a sample of customer meter records were reviewed for The Harbour, The Point and The Farms potable water systems. Field visits were made to these meters to verify the information contained in the CWS billing system. A summary is presented here along with a list of recommendations for future implementation by utility staff.

Billing Process Confirmation

Cavanaugh conducted an interview with CWS staff to understand the current policies and practices associated with the billing of customers in the three subject systems. The meters in these systems are read monthly by a third-party contracted meter reader. The central CWS billing staff prepare a “read” file from the billing software which is then uploaded to a handheld data collector. The meter reader manually reads each of the meters (NOTE: There are two cell-transmitted automated meters in the system. These meters can provide an hourly consumption history through a separate, cloud based, read system).

As reads are manually conducted and entered into the handheld, an alert is registered for any abnormal consumption (zero, negative, high or low). This alert prompts the meter reader to check the entered reading. If the reading is correct, the reader can override the alert and a note is added to the file confirming the reading. If debris or condensation prevents a meter from being read, a note is written to the file and triggers a work order for either a re-read or a meter replacement. If an accurate read cannot be obtained within the read window, an estimate is generated based on the customers previous consumption history. If a reading can be obtained during the next read period, the reading is compared to the most recent actual reading and the bill adjusted accounting for the estimated consumption.

Once all meters are read, the read file is exported back to the billing software. The billing software generates an exception report and billing technicians review the customer’s previous consumption history to either clear the exception or generate a work order for a field visit to the meter location for investigation. All bills are reviewed prior to release.

From the review conducted, the practices noted appear consistent with industry identified meter reading and exception investigation and mitigation best practices.

Meter Audit

Staff of CWS provided an export of billing information for all the customers of the three subject systems along with a color-coded random sample of accounts for investigation and auditing. The database included the following count of accounts from each system:



System Name	Count of Accounts
The Harbour	51
The Point	64
The Farms	53
Total	168

Cavanaugh randomly selected another ten accounts and generated a field visit list of 178 accounts.

On the dates of September 26 – 28th, a Cavanaugh representative visited the systems and selected meters, except for four meters that were in a gated community and were not visited. Of the 176 meters visited, there were a total of six meters that could not be located and another six that were located but the meter register was unreadable due to clouding or debris in the meter box.

At each meter, Cavanaugh collected a current reading (as able), verified the meter size and verified the meter number (as compared to the database exported from the CWS billing system).

Of the meters accessed, all meters were verified to be the size listed in the billing software.

There were three meters with an issue with the meter number. Those accounts are summarized as follows:

ACCOUNT ID	ADDRESS	CWS METER ID	FIELD OBSERVED METER ID
0319219025	164 EASTON DR	99681748	32245337
0326513228	201 STONEWALL BEACH LN	N086013066	19321180
1319061722	163 EASTON DR	994268064	99426084

NOTE: In review of the outcomes of this audit, CWS staff relayed that 164 Easton Drive has two meters, with one being an irrigation meter. The field observed Meter ID was taken from the irrigation meter and it was determined that both meters are correct in the CWS database.

Consumption and billing were manually calculated. The manual calculation of the consumption (current reading minus previous reading) matched exactly for all accounts. The manual calculation of the current billing, using the most recent rate schedule, matched for all accounts except one. The discrepancy is shown below:

ACCOUNT ID	ADDRESS	CURRENT BILLED VOLUME	CURRENT BILL \$	CALCULATED BILL \$	DIFFERENCE
7665024491	105 GROVE CREEK LN	10,280	\$136.73	\$144.91	<\$8.18>

Rate schedule used: Meter Base Charge + \$11.71 x Volume (kgal)

NOTE: In review of the outcomes of this audit, CWS staff relayed that this bill discrepancy was caused by a proration of the monthly base charge because the customer had terminated their service.



The timing of the field visits was approximately 30 days from the previous meter reads, so a comparison of the volume for that period was compared to the previous consumption (as displayed in the billing data export). The following accounts were flagged because consumption was greater than 15,000 gallons greater than the previous month's consumption:

ACCOUNT ID	ADDRESS	CURRENT READING	PREVIOUS READING	CURRENT READ VOLUME	Cavanaugh Reading	Cavanaugh Volume	Compare to Previous month
0864510000	171 STONEWALL BEACH LN	4167620	4164820	2,800	4205010	37,390	34,590
2907771520	139 LIGHTSHIP DR	3370580	3359580	11,000	3409830	39,250	28,250
0811952463	111 SWAYNE DR	473390	470590	2,800	500570	27,180	24,380
0326513228	201 STONEWALL BEACH LN	3208090	3202700	5,390	3234270	26,180	20,790
8377703901	306 BAYBERRY CREEK CIR	3051830	3048250	3,580	3073480	21,650	18,070
1378629953	127 BAYBERRY CREEK CIR	3911960	3886500	25,460	3954410	42,450	16,990
2925869147	177 BROWNSTONE DR	4848780	4837850	10,930	4875300	26,520	15,590

The dramatic increase in consumption could be legitimate based on actual usage changes, but these would be representative of "high" consumption values that should trigger a work order for further investigation.

Final Conclusion and Recommendations

Based on the findings included in this analysis, we did not identify significant or negligent issues associated with the current meter reading and billing processes of the The Harbour/The Point/The Farms water systems. The items noted above in the review and sampling appear consistent with routine operations and billing standards Cavanaugh has observed during similar analysis for Utilities nationally.

We would recommend the following best practices be implemented or continued:

- Conduct field verification of the meter information on all accounts in the three systems.
- Randomly select accounts from each billing cycle to manually check the application of the rate schedule vs. the billing calculation conducted by the billing software.

Container type: **WORKSPACE**
Container name: **PS-Consumer Services**Item type: **TICKET**
Item name: **Issue**Created By: **Joanna Morin**
Created On: **08/09/2022 09:21 AM****Date: 11/30/2022 10:42 AM****196302 - Calhoun, Don****Common**

Ticket Number: 196302
Customer Name: Calhoun, Don
Priority: Routine
Status: Closed
Assignee: Sterling Joyner
Global: No

Description:

08/16/2022 02:45 PM | Vickie Debnam

Good afternoon Mr. Calhoun,

Our office is in receipt of your most recent email dated August 16, 2022, and we appreciate your concerns regarding this matter. Based on the information provided by the utility company, a meter test was performed on August 5, 2022, and the meter is registering at 100.45%, which is within the guidelines of the North Carolina Utilities Commission. Upon the utility company receiving the work order to test your meter, the field operator noted that a swimming pool and irrigation system is at the home, which could possibly be a reason for the high usage. In reviewing your readings, they appear to be higher during the summer months of June, July, and August during 2018, 2019, and 2021. In addition, Carolina Water Service has provided a courtesy adjustment of \$650.00; and unfortunately, no additional adjustments will be warranted. Please contact our office should you have any additional concerns or questions regarding this matter at 919-733-9277.

Thank you,

Vickie Debnam, MBA, MSHRM

Director of Consumer Services

The North Carolina Utilities Commission

Public Staff Division

-----Original Message-----

From: Don Calhoun <don.calhoun47@gmail.com>

Sent: Tuesday, August 16, 2022 9:10 AM

To: Consumer.Services <Consumer.Services@psncuc.nc.gov>

Subject: [External] Carolina Water Service systematic overbilling - Mooresville, NC

Hi,

I have contacted you previously. We now know most of our neighborhood and at least two others (The Harbor at The Point and The

Point) are being overcharged for water. Bills ranging from

\$500-\$1300. This isn't just the water rate increase, there is an

issue either with their meters or how they are calculating usage. The company continues to bill and maintain the billing is fair. Please investigate this company - I am filing suit against them but there are many people affected by this massive overbilling.

Thank you,

Don Calhoun**08/09/2022 02:37 PM | Sterling Joyner**

Relayed attachment to consumer. Meter has been test as well. 100.45 accuracy

08/09/2022 02:34 PM | Sterling Joyner**08/09/2022 09:31 AM | Sterling Joyner**

E-mailed complaint to CWS

08/09/2022 09:21 AM | Joanna Morin**From:** Don Calhoun <don.calhoun47@gmail.com>**Sent:** Tuesday, August 9, 2022 8:46 AM**To:** Consumer.Services <Consumer.Services@psncuc.nc.gov>**Subject:** [External] Fwd: Overbilled

Hi,

Carolina Water Service of NC has overbilled us for 2 straight months and won't adjust their billing. They are also overbilling my

neighbor and others in our neighborhood. Our normal bill for 10 years at this residence has been \$60-\$100. They installed a new meter and then started charging us over \$700. The last two months have been \$711 and \$650 - both are 10x's our normal bill. They refuse to adjust. I've contacted the company COO, the President of NC/SC and the "community engagement" person and still the bill stays the same. I've had multiple techs come to our home and had a new digital meter installed and still no adjustment to the bill. This overbilling has been going on for years in our neighborhood. The Farms, 28117, Mooresville, NC. Please let me know what you need from me to move forward.

Thank you,

Don

----- Forwarded message -----

From: Deb Clark <Deb.Clark@carolinawaterservicenc.com>**Date:** Wed, Aug 3, 2022 at 12:25 PM**Subject:** RE: Overbilled**To:** Don Calhoun <don.calhoun47@gmail.com>

Here is a snapshot of your account – shows the account was credited \$650.

Deborah S. Clark

Communications and Community Engagement Manager

Carolina Water Service

Blue Granite Water Service

704.525.1620 (O)

980.244.1431 (M)

Deb.Clark@carolinawaterservicenc.com

OFFICIAL COPY

APR 20 2023

From: Don Calhoun <don.calhoun47@gmail.com>
Sent: Wednesday, August 3, 2022 12:13 PM
To: Deb Clark <Deb.Clark@carolinawaterservicenc.com>
Subject: Re: Overbilled

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and verify that the content is safe.

Deb,

The technician that came out yesterday said a credit was being applied to our account. Can you please verify?

On Tue, Aug 2, 2022 at 11:42 AM Deb Clark <Deb.Clark@carolinawaterservicenc.com> wrote:

Ok, I have sent this to our Customer Experience Team to investigate the issues with our operations team.

Deb

Deborah S. Clark
Communications and Community Engagement Manager
Carolina Water Service
Blue Granite Water Service
704.525.1620 (O)
980.244.1431 (M)
Deb.Clark@carolinawaterservicenc.com

From: Don Calhoun <don.calhoun47@gmail.com>
Sent: Tuesday, August 2, 2022 11:41 AM
To: Deb Clark <Deb.Clark@carolinawaterservicenc.com>
Subject: Re: Overbilled

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and verify that the content is safe.

No we don't.

On Tue, Aug 2, 2022 at 10:46 AM Deb Clark <Deb.Clark@carolinawaterservicenc.com> wrote:

Good morning,

Just a quick question, do you have an irrigation system that is not working on a schedule and over watering or a potential leak in your home?

I will take a look at the account.

Deb

Docket W-354 Sub 414
Denton Affidavit Exhibit 2

Deborah S. Clark

Communications and Community Engagement Manager

Carolina Water Service

Blue Granite Water Service

704.525.1620 (O)

980.244.1431 (M)

Deb.Clark@carolinawaterservicenc.com

OFFICIAL COPY

APR 20 2023

Issue Information

Escalated:	False
Call Back:	False
Spanish:	False
Caller Not Authorized:	False
How Received:	E-Mail
Assistant Referral:	Analyst
Primary Phone:	0
Verify Phone:	Yes
Verify Name:	Yes
Industry:	Water
Company:	C W S
Sub Division:	The Farms
Category:	Billing
Sub Category:	High Bill
Service City:	Mooresville
Service County:	Iredell
Customer Email:	Don.calhoun47@gmail.com
Contacted Company:	Yes
Reminder Sent:	False

Email

Send Email To Assignees:	False
Send Email To Contact:	False
Send Email To CC:	False



Carolina Water Service
of North Carolina

Memorandum

To: Sterling Joyner
Public Staff – Consumer Services Division
430 N. Salisbury Street, Suite 5060
4326 Mail Service Center
Raleigh, NC 27699-4300

From: Deb Clark, Communications and Community Engagement Manager
Carolina Water Service, Inc. of North Carolina

Date: August 9, 2022

RE: Don Calhoun - Complaint about high bill

This memorandum responds to the August 9, 2022, inquiry filed with the North Carolina Consumer Services Division, Public Staff ("Public Staff") by Don Calhoun whose Carolina Water Service, Inc. of North Carolina ("CWSNC" or "Company") address at 393 Bayberry Creek Circle, Mooresville, North Carolina in The Point community.

The customer contacted the company beginning on August 1, 2022, and continuing through the week to report a high bill and meter read errors. Upon receiving the work order, a field operator went to the customer's home, read the meter, and checked for leaks. The operator noted a swimming pool and irrigation system at the home, which can be the culprits of unknown leaks. Since the meter appeared to be reading the usage correctly, the operator asked the customer if he had experienced any recent or past leaks either inside or outside on the property.

The customer indicated there were no leaks on the property. The operator met the customer again on August 2, 2022, and advised the customer he was using approximately 1800 gallons of water per day for the last fourteen days.

The customer then requested a new residential 5/8th meter at the home. The operator installed a new AMI meter (advanced metering infrastructure) Neptune Mach 10 cellular meter. The new meter will be read at the end of the week to determine the customer's usage.

On August 2, 2022, the company provided the customer a courtesy reimbursement of \$650. The customer requested another \$650 reimbursement to the account, which was not provided given the usage is in line with the previous month.

The customer records demonstrate that the following usage has occurred with the corresponding billing for the usage:

Meter read date	Usage in gallons	Meter read	Read type
NEW METER # 220745442			
08-02-2022 11:30PM	4,540	131850	Verified
Meter Tested 100% accurate			
Meter# 43582896			
Test attached for Review.			
8-2022 03:50PM	4,700	989550	Regular
05-01-2022 12:06PM	8,940	984850	Regular
03-28-2022 01:37PM	5,750	975910	Regular
02-28-2022 03:50PM	3,790	970160	Regular
01-31-2022 05:18PM	4,060	966370	Regular
12-31-2021 01:47PM	5,340	962310	Regular
11-27-2021 12:34PM	4,390	956970	Regular
10-26-2021 05:24PM	6,300	952580	Regular
09-26-2021 06:19PM	12,230	946280	Regular
08-27-2021 03:36PM	20,600	934050	Regular
08-27-2021 03:36PM	22,090	913450	Regular
07-21-2021 04:50AM	18,030	891360	Regular
06-26-2021 06:00PM	14,500	873330	Regular
05-26-2021 04:47PM	3,900	858830	Regular
04-25-2021 04:34PM	3,110	854930	Regular
03-24-2021 03:01PM	3,940	851820	Regular
02-24-2021 01:14PM	3,920	847880	Regular
01-23-2021 04:22PM	3,920	847880	Verified
12-23-2020 04:45PM	3,520	843960	Verified
11-25-2020 01:23PM	3,540	840440	Regular
10-27-2020 01:26PM	3,630	836900	Verified
09-29-2020 04:55PM	4,310	833270	Verified
08-25-2020 04:46PM	3,490	828960	Verified
07-26-2020 02:03PM	11,220	825470	Regular
06-24-2020 04:07PM	5,170	814250	Verified
05-23-2020 01:46PM	3,920	809080	Verified
04-25-2020 01:58PM	4,160	805160	Regular
03-26-2020 01:05PM	4,000	801000	Regular
02-25-2020 05:54PM	4,040	797000	Verified
01-30-2020 12:00PM	3,530	792960	Office Estimate

01-26-2020 12:05PM	3,030	792460	Verified
01-02-2020 02:10PM	4,600	789430	Verified
11-24-2019 05:43PM	3,010	784830	Verified
10-29-2019 11:05AM	23,410	781820	Verified
09-27-2019 11:31AM	14,780	758410	Verified meter re-read
09-19-2019 02:50PM	0	743630	Regular
09-19-2019 10:40AM	13,680	743630	Regular
08-25-2019 05:01PM	22,210	729950	Verified
07-25-2019 04:35PM	16,330	707740	Regular
06-24-2019 01:54PM	15,850	691410	Verified
05-25-2019 07:10PM	12,910	675560	Verified
04-23-2019 05:58PM	3,990	662650	Verified
03-24-2019 05:15PM	3,380	658660	Verified
02-25-2019 12:03PM	4,070	655280	Verified
01-25-2019 02:22PM	4,210	651210	Verified
12-27-2018 10:58AM	3,990	647000	Verified
11-27-2018 02:17PM	3,650	643010	Verified
10-29-2018 04:57PM	4,000	639360	Verified
09-30-2018 12:34PM	13,550	635360	Verified
08-30-2018 12:43PM	11,290	621810	Regular
07-27-2018 03:55PM	38,650	610520	Verified
06-23-2018 06:58AM	20,740	571870	Verified
05-28-2018 09:47AM	3,780	551130	Verified
05-01-2018 11:54AM	3,830	547350	Verified
04-02-2018 12:25PM	4,180	543520	Verified
02-28-2018 10:33AM	16,620	539340	Verified
02-01-2018 02:37PM	34,150	522720	Verified
01-02-2018 11:44AM	4,430	488570	Verified

The monthly billing for the customer's water service for the last two years is below:

ARREARS DATE	FINANCIAL TRANSACTION TYPE	CURRENT AMOUNT	CURRENT BALANCE	PAYOFF AMOUNT	PAYOFF BALANCE
08-09-2022	Pay Segment	(\$110.71)	\$539.44	(\$110.71)	\$539.44
08-03-2022	Bill Segment	\$529.11	\$650.15	\$529.11	\$650.15
08-02-2022	Miscellaneous Adjustment - Residential Water (Customer received reimbursement)	(\$650.00)	\$121.04	(\$650.00)	\$121.04
07-21-2022	Bill Segment	\$771.04	\$771.04	\$771.04	\$771.04
06-16-2022	Pay Segment	(\$68.94)	\$0.00	(\$68.94)	\$0.00
06-05-2022	Bill Segment	\$68.94	\$68.94	\$68.94	\$68.94
05-11-2022	Pay Segment	(\$121.69)	\$0.00	(\$121.69)	\$0.00
05-03-2022	Bill Segment	\$121.69	\$121.69	\$121.69	\$121.69
04-21-2022	Pay Segment	(\$76.51)	\$0.00	(\$76.51)	\$0.00
04-06-2022	Bill Segment	\$76.51	\$76.51	\$76.51	\$76.51

03-14-2022	Pay Segment	(\$60.30)	\$0.00	(\$60.30)	\$0.00
03-03-2022	Bill Segment	\$60.30	\$60.30	\$60.30	\$60.30
02-14-2022	Pay Segment	(\$62.53)	\$0.00	(\$62.53)	\$0.00
02-03-2022	Bill Segment	\$62.53	\$62.53	\$62.53	\$62.53
01-21-2022	Pay Segment	(\$73.12)	\$0.00	(\$73.12)	\$0.00
01-06-2022	Bill Segment	\$73.12	\$73.12	\$73.12	\$73.12
12-16-2021	Pay Segment	(\$65.27)	\$0.00	(\$65.27)	\$0.00
12-05-2021	Bill Segment	\$65.27	\$65.27	\$65.27	\$65.27
11-18-2021	Pay Segment	(\$81.04)	\$0.00	(\$81.04)	\$0.00
11-03-2021	Bill Segment	\$81.04	\$81.04	\$81.04	\$81.04
10-18-2021	Pay Segment	(\$129.80)	\$0.00	(\$129.80)	\$0.00
10-07-2021	Bill Segment	\$129.80	\$129.80	\$129.80	\$129.80
09-17-2021	Pay Segment	(\$198.87)	\$0.00	(\$198.87)	\$0.00
09-06-2021	Bill Segment	\$198.87	\$198.87	\$198.87	\$198.87
08-13-2021	Pay Segment	(\$211.17)	\$0.00	(\$211.17)	\$0.00
08-04-2021	Bill Segment	\$211.17	\$211.17	\$211.17	\$211.17
07-15-2021	Pay Segment	(\$177.67)	\$0.00	(\$177.67)	\$0.00
07-05-2021	Bill Segment	\$177.67	\$177.67	\$177.67	\$177.67
06-17-2021	Pay Segment	(\$148.54)	\$0.00	(\$148.54)	\$0.00
06-03-2021	Bill Segment	\$148.54	\$148.54	\$148.54	\$148.54
05-12-2021	Pay Segment	(\$61.00)	\$0.00	(\$61.00)	\$0.00
05-04-2021	Bill Segment	\$61.00	\$61.00	\$61.00	\$61.00
04-20-2021	Pay Segment	(\$54.35)	\$0.00	(\$54.35)	\$0.00
04-06-2021	Bill Segment	\$54.35	\$54.35	\$54.35	\$54.35
03-18-2021	Pay Segment	(\$61.17)	\$0.00	(\$61.17)	\$0.00
03-03-2021	Bill Segment	\$61.17	\$61.17	\$61.17	\$61.17
02-25-2021	Pay Segment	(\$61.02)	\$0.00	(\$61.02)	\$0.00
02-04-2021	Bill Segment	\$61.02	\$61.02	\$61.02	\$61.02
01-27-2021	Pay Segment	(\$57.54)	\$0.00	(\$57.54)	\$0.00
01-07-2021	Bill Segment	\$57.54	\$57.54	\$57.54	\$57.50

The current customer's bills for the last four months (May to August) are below. Note the amount of water used:

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$24.53		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$24.53		1	\$0.00	
3	43,090 gallons at \$11.71 per 1,000 gallons	\$504.58	Gallons	43090	\$0.00	Not Applicable
4	Federal Deferred Tax Refund	\$0.00		0	\$529.11	Not Applicable
5	Federal Tax Act Refund	\$0.00		0	\$529.11	Not Applicable
6	Water System Improvement Charge	\$0.00		0	\$529.11	Not Applicable
7	Total Residential Water	\$529.00				

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$24.53		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$24.53		1	\$0.00	
3	63,750 gallons at \$11.71 per 1,000 gallons	\$746.51	Gallons	63750	\$0.00	Not Applicable
4	Federal Deferred Tax Refund	\$0.00		0	\$771.04	Not Applicable
5	Federal Tax Act Refund	\$0.00		0	\$771.04	Not Applicable
6	Water System Improvement Charge	\$0.00		0	\$771.04	Not Applicable
7	Total Residential Water	\$771.04		0	\$0.00	

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$13.90		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$13.90		1	\$0.00	
3	4,700 gallons at \$11.71 per 1,000 gallons	\$55.04	Gallons	4700	\$0.00	Not Applicable
4	Federal Deferred Tax Refund	\$0.00		0	\$68.94	Not Applicable
5	Federal Tax Act Refund	\$0.00		0	\$68.94	Not Applicable
6	Water System Improvement Charge	\$0.00		0	\$68.94	Not Applicable
7	Total Residential Water	\$68.94		0	\$0.00	

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$8.51		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$8.51		1	\$0.00	
3	2,629 gallons at \$8.27 per 1,000 gallons	\$21.74	Gallons	2629	\$0.00	Not Applicable

4	Federal Deferred Tax Refund	(\$0.09)		0	\$30.25	Not Applicable
5	Federal Deferred Tax Refund	\$0.00		0	\$30.25	Not Applicable
6	Federal Tax Act Refund	\$0.00		0	\$30.25	Not Applicable
7	Water System Improvement Charge	\$0.31		0	\$30.25	Not Applicable
8	Total Residential Water	\$30.47		0	\$0.00	

The current approved tariff rate for water is below. The new rates became effective April 08, 2022.

Residential Water	Meter Size	Old Rates		New Rates	
		Base Rate	Usage Rate	Base Rate	Usage Rate
	Unmetered	\$ 58.54		\$ 68.71	
	5/8"	\$ 28.92	\$8.27	\$ 24.53	\$11.71
	3/4"	\$ 28.92	\$8.27	\$ 24.53	\$11.71

The customer has contacted the Chief Operating Officer/Executive Vice President, the President of CWSNC, the Area Manager, the Customer Experience Team, our Office Administrator, and the Communications and Community Engagement Manager to pursue another reimbursement to the account. Based on the lack of any known leaks in the customer's home/property, the reported usage, the meter test indicating 100% accuracy, and the new rates, the customer's bill is correct.

The Company has discussed the annual spring/summer large water consumption in the community with the Property Owners' Association Board. The community must maintain landscaping and lawns to a certain standard that requires higher water usage in spring and summer months. The Company will continue to work with the board and provide water saving irrigation and usage materials.

Customers are encouraged to call our Customer Experience team if they need any other information concerning their service, wastewater connection, and bill, including the rate for sewer service.

We encourage customers to reach out to our Customer Experience team to report any issues or with any questions at any time.

The Customer Experience Team may be contacted via phone at (800) 525-7990 from 8:00 a.m. to 5:00 p.m.

Please do not hesitate to contact me at deb.clark@carolinawaterservicenc.com if you have any further questions.

Sincerely,

A handwritten signature in black ink that reads "Deborah S. Clark". The signature is written in a cursive, flowing style.

Deborah S. Clark
Communications and Community Engagement Manager



Mid America Meter, Inc.
710 Hamel Road • Medina, MN 55340
Phone: 763-478-8041 • 1-800-324-0365
Fax: 763-478-8043

Docket W-354 Sub 414
Denton Affidavit Exhibit 2

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APR 20 2023

Meter Test Results

Tested for: Carolina Water Service (NC)

Work Order Information

Work Order: 14389

Test Date: 8/5/2022

Tested by: Connor Czech

Meter Information

Size: 5/8 x 3/4"

Manufacturer: Badger

Model: M25

Type: Disk/Piston

Serial Number: 43582896

Register Type: Straight R

Registration: USG

Location: 393 BayBerry Creek

Register Readings

	Single Register	Dual Register	
		Low	High
Beginning	98,955		
Ending	98,970		

Test Results

Before		After	
GPM	Percent	GPM	Percent
15.00	99.72	0.00	0.00
2.00	100.74	0.00	0.00
0.25	100.89	0.00	0.00

This Meter meets or exceeds the AWWA standards.

Parts

Comments

MAM tests by weight.

Approximately 120 USG used during tests.

10 USG for low and mid flow.

100 USG for high flow.

Average Accuracy is: 100.45%

Container type: **WORKSPACE**
Container name: **PS-Consumer Services**Item type: **TICKET**
Item name: **Issue**Created By: **Sara Cummins**
Created On: **09/01/2022 12:37 PM****Date: 11/30/2022 10:43 AM****196594 - Calhoun, Don****Common**

Ticket Number: 196594
Customer Name: Calhoun, Don
Priority: Routine
Status: Closed
Assignee: Sara Cummins
Global: No

Description:**10/12/2022 03:31 PM | Sara Cummins**

emailed vickie to see if she has info on fc.

From: Don Calhoun <don.calhoun47@gmail.com>

Sent: Wednesday, October 12, 2022 3:14 PM

To: Consumer.Services <Consumer.Services@psncuc.nc.gov>

Subject: [External] Hi - I filed a Formal Complaint on 10/3 against Carolina Water Service

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam. <<mailto:report.spam@nc.gov>>

However I still do not see it posted to the website. Does it typically take some time to review and post?

Thank you,

Don Calhoun

09/27/2022 11:25 AM | Vickie Debnam**To Subject Sent Size Categories****Cummins, Sara J FW: [External] Carolina Water Service systematic overbilling - Mooresville, NC 11:24 AM 32 KB****Sara,**

Please look at issue number 196594. Looks like you put Mr. Edwards information on Don Calhoun footprints issue in error. As for Mr. Calhoun, he continues to send letters concerning the same high bill complaint. See the information below that was sent to Mr. Calhoun. He sent another letter yesterday which I placed on your desk. Please contact Mr. Calhoun and advise him that according to the email sent to him below on (August 16th), he will not be getting any

additional adjustments. A meter test have been performed and is registering within the guidelines of the Commission's Rules/Reg's. Advise him that he has the option to file a formal complaint if necessary.

Thanks,

Vickie Debnam

09/20/2022 02:05 PM | Sara Cummins

Docket W-354 Sub 414
Denton Affidavit Exhibit 2

From: Cummins, Sara J
Sent: Tuesday, September 20, 2022 2:00 PM
To: ATT Regulatory Referrals <Att_Regulatory_Referrals@amcustomercare.att-mail.com>
Subject: Department of Veterans Affairs

Good Afternoon,

We received a complaint from Mr. Edwards regarding a problem with dialing numbers with an area code of 336. Please review this issue and contact the consumer. Please respond to this issue with all relevant information by 10/4/22.

Thank you.

Respectfully,

Sara Cummins

Complaint Analyst

PSNCUC

sara.cummins@psncuc.nc.gov

From: Deb Clark <Deb.Clark@carolinawaterservicenc.com>
Sent: Tuesday, September 13, 2022 1:45 PM
To: Cummins, Sara J <sara.cummins@psncuc.nc.gov>
Subject: [External] RE: Calhoun, Don

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Good afternoon, Sara,

I have attached the response and supporting documents for your review with the customer's complaint. Please let me know if you need any other information.

Have a great day,

Deb

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APR 20 2023

Deborah S. Clark
Communications and Community Engagement Manager
Carolina Water Service
Blue Granite Water Service
704.525.1620 (O)
980.244.1431 (M)
Deb.Clark@carolinawaterservicenc.com

09/01/2022 12:49 PM | Sara Cummins

From: Cummins, Sara J
Sent: Thursday, September 1, 2022 12:48 PM
To: Deb Clark <Deb.Clark@carolinawaterservicenc.com>
Subject: Calhoun, Don

Good Afternoon,

We received a complaint from Mr. Calhoun regarding high usage at his address. Please review this issue and contact the consumer. Please respond to this issue with all relevant information by 9/15/2022.

Thank you.

Respectfully,

Sara Cummins
Complaint Analyst

PSNCUC

sara.cummins@psncuc.nc.gov

09/01/2022 12:37 PM | Sara Cummins

consumer:

has rcvd high bills starting in june; bill went frm 60.00 to 771.00; cld them at that time was told it was usage; this is unusual; they have never used this amt of water; neighbors are also rcvng ridiculously high bills; this is happening in 500+ houses; came out and replaced meter three times; cons had an irrigation specialist and plumber come and check the house for leaks, none found; this is clearly wrong and needs to be fixed.

Issue Information

Escalated: False
Call Back: False
Spanish: False

Caller Not Authorized:	False
How Received:	Telephone
Assistant Referral:	Analyst
Primary Phone:	704-609-0242
Verify Phone:	Yes
Verify Name:	Yes
Industry:	Water
Company:	C W S
Category:	Billing
Sub Category:	High Bill
Service Address:	393 Abbary Creek Cir.
Service City:	Mooreville
Service Zip Code:	28117
Service County:	Iredell
Customer Email:	Don.calhoun47@gmail.com
Contacted Company:	Yes
Reminder Sent:	False

Email

Send Email To Assignees:	False
Send Email To Contact:	False
Send Email To CC:	False



Carolina Water Service
of North Carolina™

Memorandum

To: Sara J. Cummins
Public Staff – Consumer Services Division
430 N. Salisbury Street, Suite 5060
4326 Mail Service Center
Raleigh, NC 27699-4300

From: Deb Clark, Communications and Community Engagement Manager
Carolina Water Service, Inc. of North Carolina

Date: September 13, 2022

RE: Don Calhoun - Second Complaint about High Bills

This memorandum responds to the September 1, 2022, inquiry filed with the North Carolina Consumer Services Division, Public Staff ("Public Staff") by Don Calhoun whose Carolina Water Service, Inc. of North Carolina ("CWSNC" or "Company") address at 393 Bayberry Creek Circle, Mooresville, North Carolina in The Point community located on Lake Norman.

The customer contacted the company beginning on August 1, 2022, and continuing through the week to report a high bill and meter read errors. Upon receiving the work order, a field operator went to the customer's home, read the meter, and checked for leaks. The operator noted a swimming pool and irrigation system at the home, which can be the culprits of unknown leaks. Since the meter appeared to be reading the usage correctly, the operator asked the customer if he had experienced any recent or past leaks either inside or outside on the property.

The customer indicated there were no leaks on the property. The operator met the customer again on August 2, 2022, and advised the customer he was using approximately 1800 gallons of water per day for the last fourteen days.

The customer then requested a new residential 5/8th meter at the home. The operator installed a new AMI meter (advanced metering infrastructure) Neptune Mach 10 cellular meter. The new meter will be read at the end of the week to determine the customer's usage.

On August 2, 2022, the company provided the customer a courtesy reimbursement of \$650. The customer requested another \$650 reimbursement to the account, which was not provided given the usage is in line with the previous month.

The customer filed the second complaint indicating the bill continues to be higher than before.

At this point in time, the customer has received four new meters including two advanced metering infrastructure or AMI meters. Attached are the two meter tests that indicate the previous meters were

operating properly. Operations staff continue to download and monitor the usage of the meters. See the attached report.

Our Operations staff have been onsite to work with the customer and explain the new volumetric rate. The base rate dropped from \$28.92 to \$24.53. However, the volumetric rate increased from \$8.27 to \$11.71. The increase is to incentivize water conservation, assist those with very low usage, and the assist seasonal customers.

The company has provided the Point Owners Association, The Farms Homeowners Association and the Harbors Homeowners Association tips on water conservation, irrigation leak detection, in-home leak detection, and WaterSense water saving product suggestions. The materials are also found on our front page of the CWSNC website for all customers.

The customer records demonstrate that the following usage has occurred with the corresponding billing for the usage:

Meter read date	Usage in gallons	Meter read	Read type
NEW METER # 220745442			
08-02-2022 11:30PM	4,540	131850	Verified

Meter Tested 100% accurate **Meter# 43582896**

Test attached for Review.

8-2022 03:50PM	4,700	989550	Regular
05-01-2022 12:06PM	8,940	984850	Regular
03-28-2022 01:37PM	5,750	975910	Regular
02-28-2022 03:50PM	3,790	970160	Regular
01-31-2022 05:18PM	4,060	966370	Regular
12-31-2021 01:47PM	5,340	962310	Regular
11-27-2021 12:34PM	4,390	956970	Regular
10-26-2021 05:24PM	6,300	952580	Regular
09-26-2021 06:19PM	12,230	946280	Regular
08-27-2021 03:36PM	20,600	934050	Regular
08-27-2021 03:36PM	22,090	913450	Regular
07-21-2021 04:50AM	18,030	891360	Regular
06-26-2021 06:00PM	14,500	873330	Regular
05-26-2021 04:47PM	3,900	858830	Regular
04-25-2021 04:34PM	3,110	854930	Regular
03-24-2021 03:01PM	3,940	851820	Regular
02-24-2021 01:14PM	3,920	847880	Regular
01-23-2021 04:22PM	3,920	847880	Verified
12-23-2020 04:45PM	3,520	843960	Verified
11-25-2020 01:23PM	3,540	840440	Regular
10-27-2020 01:26PM	3,630	836900	Verified
09-29-2020 04:55PM	4,310	833270	Verified
08-25-2020 04:46PM	3,490	828960	Verified
07-26-2020 02:03PM	11,220	825470	Regular
06-24-2020 04:07PM	5,170	814250	Verified

05-23-2020 01:46PM	3,920	809080	Verified
04-25-2020 01:58PM	4,160	805160	Regular
03-26-2020 01:05PM	4,000	801000	Regular
02-25-2020 05:54PM	4,040	797000	Verified
01-30-2020 12:00PM	3,530	792960	Office Estimate
01-26-2020 12:05PM	3,030	792460	Verified
01-02-2020 02:10PM	4,600	789430	Verified
11-24-2019 05:43PM	3,010	784830	Verified
10-29-2019 11:05AM	23,410	781820	Verified
09-27-2019 11:31AM	14,780	758410	Verified meter re-read
09-19-2019 02:50PM	0	743630	Regular
09-19-2019 10:40AM	13,680	743630	Regular
08-25-2019 05:01PM	22,210	729950	Verified
07-25-2019 04:35PM	16,330	707740	Regular
06-24-2019 01:54PM	15,850	691410	Verified
05-25-2019 07:10PM	12,910	675560	Verified
04-23-2019 05:58PM	3,990	662650	Verified
03-24-2019 05:15PM	3,380	658660	Verified
02-25-2019 12:03PM	4,070	655280	Verified
01-25-2019 02:22PM	4,210	651210	Verified
12-27-2018 10:58AM	3,990	647000	Verified
11-27-2018 02:17PM	3,650	643010	Verified
10-29-2018 04:57PM	4,000	639360	Verified
09-30-2018 12:34PM	13,550	635360	Verified
08-30-2018 12:43PM	11,290	621810	Regular
07-27-2018 03:55PM	38,650	610520	Verified
06-23-2018 06:58AM	20,740	571870	Verified
05-28-2018 09:47AM	3,780	551130	Verified
05-01-2018 11:54AM	3,830	547350	Verified
04-02-2018 12:25PM	4,180	543520	Verified
02-28-2018 10:33AM	16,620	539340	Verified
02-01-2018 02:37PM	34,150	522720	Verified
01-02-2018 11:44AM	4,430	488570	Verified

The monthly billing for the customer's water service for the last two years is below:

ARREARS DATE	FINANCIAL TRANSACTION TYPE	CURRENT AMOUNT	CURRENT BALANCE	PAYOFF AMOUNT	PAYOFF BALANCE
09-06-2022	Bill Segment	\$434.47	\$863.91	\$434.47	\$863.91
08-24-2022	Pay Segment	(\$110.00)	\$429.44	(\$110.00)	\$429.44
08-09-2022	Pay Segment	(\$110.71)	\$539.44	(\$110.71)	\$539.44
08-03-2022	Bill Segment	\$529.11	\$650.15	\$529.11	\$650.15
08-02-2022	Miscellaneous Adjustment - Residential Water	(\$650.00)	\$121.04	(\$650.00)	\$121.04
07-21-2022	Bill Segment	\$771.04	\$771.04	\$771.04	\$771.04
06-16-2022	Pay Segment	(\$68.94)	\$0.00	(\$68.94)	\$0.00
06-05-2022	Bill Segment	\$68.94	\$68.94	\$68.94	\$68.94

05-11-2022	Pay Segment	(\$121.69)	\$0.00	(\$121.69)	\$0.00
05-03-2022	Bill Segment	\$121.69	\$121.69	\$121.69	\$121.69
04-21-2022	Pay Segment	(\$76.51)	\$0.00	(\$76.51)	\$0.00
04-06-2022	Bill Segment	\$76.51	\$76.51	\$76.51	\$76.51
03-14-2022	Pay Segment	(\$60.30)	\$0.00	(\$60.30)	\$0.00
03-03-2022	Bill Segment	\$60.30	\$60.30	\$60.30	\$60.30
02-14-2022	Pay Segment	(\$62.53)	\$0.00	(\$62.53)	\$0.00
02-03-2022	Bill Segment	\$62.53	\$62.53	\$62.53	\$62.53
01-21-2022	Pay Segment	(\$73.12)	\$0.00	(\$73.12)	\$0.00
01-06-2022	Bill Segment	\$73.12	\$73.12	\$73.12	\$73.12
12-16-2021	Pay Segment	(\$65.27)	\$0.00	(\$65.27)	\$0.00
12-05-2021	Bill Segment	\$65.27	\$65.27	\$65.27	\$65.27
11-18-2021	Pay Segment	(\$81.04)	\$0.00	(\$81.04)	\$0.00
11-03-2021	Bill Segment	\$81.04	\$81.04	\$81.04	\$81.04
10-18-2021	Pay Segment	(\$129.80)	\$0.00	(\$129.80)	\$0.00
10-07-2021	Bill Segment	\$129.80	\$129.80	\$129.80	\$129.80
09-17-2021	Pay Segment	(\$198.87)	\$0.00	(\$198.87)	\$0.00
09-06-2021	Bill Segment	\$198.87	\$198.87	\$198.87	\$198.87
08-13-2021	Pay Segment	(\$211.17)	\$0.00	(\$211.17)	\$0.00
08-04-2021	Bill Segment	\$211.17	\$211.17	\$211.17	\$211.17
07-15-2021	Pay Segment	(\$177.67)	\$0.00	(\$177.67)	\$0.00
07-05-2021	Bill Segment	\$177.67	\$177.67	\$177.67	\$177.67
06-17-2021	Pay Segment	(\$148.54)	\$0.00	(\$148.54)	\$0.00
06-03-2021	Bill Segment	\$148.54	\$148.54	\$148.54	\$148.54
05-12-2021	Pay Segment	(\$61.00)	\$0.00	(\$61.00)	\$0.00
05-04-2021	Bill Segment	\$61.00	\$61.00	\$61.00	\$61.00
04-20-2021	Pay Segment	(\$54.35)	\$0.00	(\$54.35)	\$0.00
04-06-2021	Bill Segment	\$54.35	\$54.35	\$54.35	\$54.35
03-18-2021	Pay Segment	(\$61.17)	\$0.00	(\$61.17)	\$0.00
03-03-2021	Bill Segment	\$61.17	\$61.17	\$61.17	\$61.17
02-25-2021	Pay Segment	(\$61.02)	\$0.00	(\$61.02)	\$0.00
02-04-2021	Bill Segment	\$61.02	\$61.02	\$61.02	\$61.02
01-27-2021	Pay Segment	(\$57.54)	\$0.00	(\$57.54)	\$0.00
01-07-2021	Bill Segment	\$57.54	\$57.54	\$57.54	\$57.54
12-30-2020	Pay Segment	(\$57.65)	\$0.00	(\$57.65)	\$0.00
12-16-2020	Pay Segment	(\$58.38)	\$57.65	(\$58.38)	\$57.65
12-09-2020	Bill Segment	\$57.65	\$116.03	\$57.65	\$116.03
11-05-2020	Bill Segment	\$58.38	\$58.38	\$58.38	\$58.38
10-19-2020	Pay Segment	(\$63.94)	\$0.00	(\$63.94)	\$0.00
10-05-2020	Bill Segment	\$63.94	\$63.94	\$63.94	\$63.94
09-18-2020	Pay Segment	(\$177.78)	\$0.00	(\$177.78)	\$0.00
09-07-2020	Bill Segment	\$57.23	\$177.78	\$57.23	\$177.78
08-04-2020	Bill Segment	\$120.55	\$120.55	\$120.55	\$120.55
07-21-2020	Pay Segment	(\$71.00)	\$0.00	(\$71.00)	\$0.00
07-05-2020	Bill Segment	\$71.00	\$71.00	\$71.00	\$71.00
06-16-2020	Pay Segment	(\$60.76)	\$0.00	(\$60.76)	\$0.00
06-03-2020	Bill Segment	\$60.76	\$60.76	\$60.76	\$60.76

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05-20-2020	Pay Segment	(\$61.89)	\$0.00	(\$61.89)	\$0.00
05-07-2020	Bill Segment	\$61.89	\$61.89	\$61.89	\$61.89
04-23-2020	Pay Segment	(\$55.36)	\$0.00	(\$55.36)	\$0.00
04-05-2020	Bill Segment	\$55.36	\$55.36	\$55.36	\$55.36
03-13-2020	Pay Segment	(\$53.18)	\$0.00	(\$53.18)	\$0.00
03-04-2020	Bill Segment	\$53.18	\$53.18	\$53.18	\$53.18
02-20-2020	Pay Segment	(\$49.57)	\$0.00	(\$49.57)	\$0.00
02-06-2020	Bill Segment	\$49.57	\$49.57	\$49.57	\$49.57
01-23-2020	Pay Segment	(\$103.29)	\$0.00	(\$103.29)	\$0.00
01-07-2020	Bill Segment	\$56.73	\$103.29	\$56.73	\$103.29
01-07-2020	Late Payment Charge	\$0.46	\$46.56	\$0.46	\$46.56
12-05-2019	Bill Segment	\$46.10	\$46.10	\$46.10	\$46.10

The current customer's bills for the last five months (May to September) are below. Note the amount of water used:

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$24.53		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$24.53		1	\$0.00	
3	35,008 gallons at \$11.71 per 1,000 gallons	\$409.94	Gallons	35008	\$0.00	Not Applicable
4	Federal Deferred Tax Refund	\$0.00		0	\$434.47	Not Applicable
5	Federal Tax Act Refund	\$0.00		0	\$434.47	Not Applicable
6	Water System Improvement Charge	\$0.00		0	\$434.47	Not Applicable
7	Total Residential Water	\$434.47		0	\$0.00	

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$24.53		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$24.53		1	\$0.00	
3	43,090 gallons at \$11.71 per 1,000 gallons	\$504.58	Gallons	43090	\$0.00	Not Applicable
4	Federal Deferred Tax Refund	\$0.00		0	\$529.11	Not Applicable
5	Federal Tax Act Refund	\$0.00		0	\$529.11	Not Applicable
6	Water System Improvement Charge	\$0.00		0	\$529.11	Not Applicable
7	Total Residential Water	\$529.00				

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$24.53		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$24.53		1	\$0.00	
3	63,750 gallons at \$11.71 per 1,000 gallons	\$746.51	Gallons	63750	\$0.00	Not Applicable
4	Federal Deferred Tax Refund	\$0.00		0	\$771.04	Not Applicable
5	Federal Tax Act Refund	\$0.00		0	\$771.04	Not Applicable
6	Water System Improvement Charge	\$0.00		0	\$771.04	Not Applicable
7	Total Residential Water	\$771.04		0	\$0.00	

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$13.90		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$13.90		1	\$0.00	
3	4,700 gallons at \$11.71 per 1,000 gallons RATE INCREASE In VOLUMERIC RATES	\$55.04	Gallons	4700	\$0.00	Not Applicable
4	Federal Deferred Tax Refund	\$0.00		0	\$68.94	Not Applicable
5	Federal Tax Act Refund	\$0.00		0	\$68.94	Not Applicable
6	Water System Improvement Charge	\$0.00		0	\$68.94	Not Applicable
7	Total Residential Water	\$68.94		0	\$0.00	

SEQUENCE	DESCRIPTION ON BILL	CALCULATED AMOUNT	UNIT OF MEASURE	BILLABLE SERVICE QUANTITY	BASE AMOUNT	BILL FACTOR CHAR VALUE
1	Base Charge (FCPO)	\$8.51		0	\$0.00	5/8" Meter
2	Residential Water Base Charge	\$8.51		1	\$0.00	
3	2,629 gallons at \$8.27 per 1,000 gallons OLD VOLUMETRIC RATE	\$21.74	Gallons	2629	\$0.00	Not Applicable
4	Federal Deferred Tax Refund	(\$0.09)		0	\$30.25	Not Applicable
5	Federal Deferred Tax Refund	\$0.00		0	\$30.25	Not Applicable
6	Federal Tax Act Refund	\$0.00		0	\$30.25	Not Applicable
7	Water System Improvement Charge	\$0.31		0	\$30.25	Not Applicable

8	Total Residential Water	\$30.47	0	\$0.00
---	-------------------------	---------	---	--------

The current approved tariff rate for water is below. The new rates became effective April 08, 2022.
Note, the volumetric rate increased, and the base rate decreased.

Residential Water		Old Rates		New Rates	
	Meter Size	Base Rate	Usage Rate	Base Rate	Usage Rate
	Unmetered	\$ 58.54		\$ 68.71	
	5/8"	\$ 28.92	\$8.27	\$ 24.53	\$11.71
	3/4"	\$ 28.92	\$8.27	\$ 24.53	\$11.71

The Company continues to work with Mr. Calhoun to determine the high usage. Disconnect for non-payment has been suspended until we work with the customer to explore reasons for his high usage.

However, based on the lack of any known leaks in the customer's home/property, the reported usage, the meter test indicating 100% accuracy, and the new rates, the customer's bill is correct.

The Company has discussed the annual seasonal (May to September) large water consumption in the community with the Lake Norman area Property Owners' Association Boards. These communities must maintain landscaping and lawns to a certain standard that requires higher water usage in spring and summer months. The Company will continue to work with the boards and provide water saving irrigation and usage materials.

Customers are encouraged to call our Customer Experience team if they need any other information concerning their service, wastewater connection, and bill, including the rate for sewer service.

We encourage customers to reach out to our Customer Experience team to report any issues or with any questions at any time.

The Customer Experience Team may be contacted via phone at (800) 525-7990 from 8:00 a.m. to 5:00 p.m.

Please do not hesitate to contact me at deb.clark@carolinawaterservicenc.com if you have any further questions.

Sincerely,

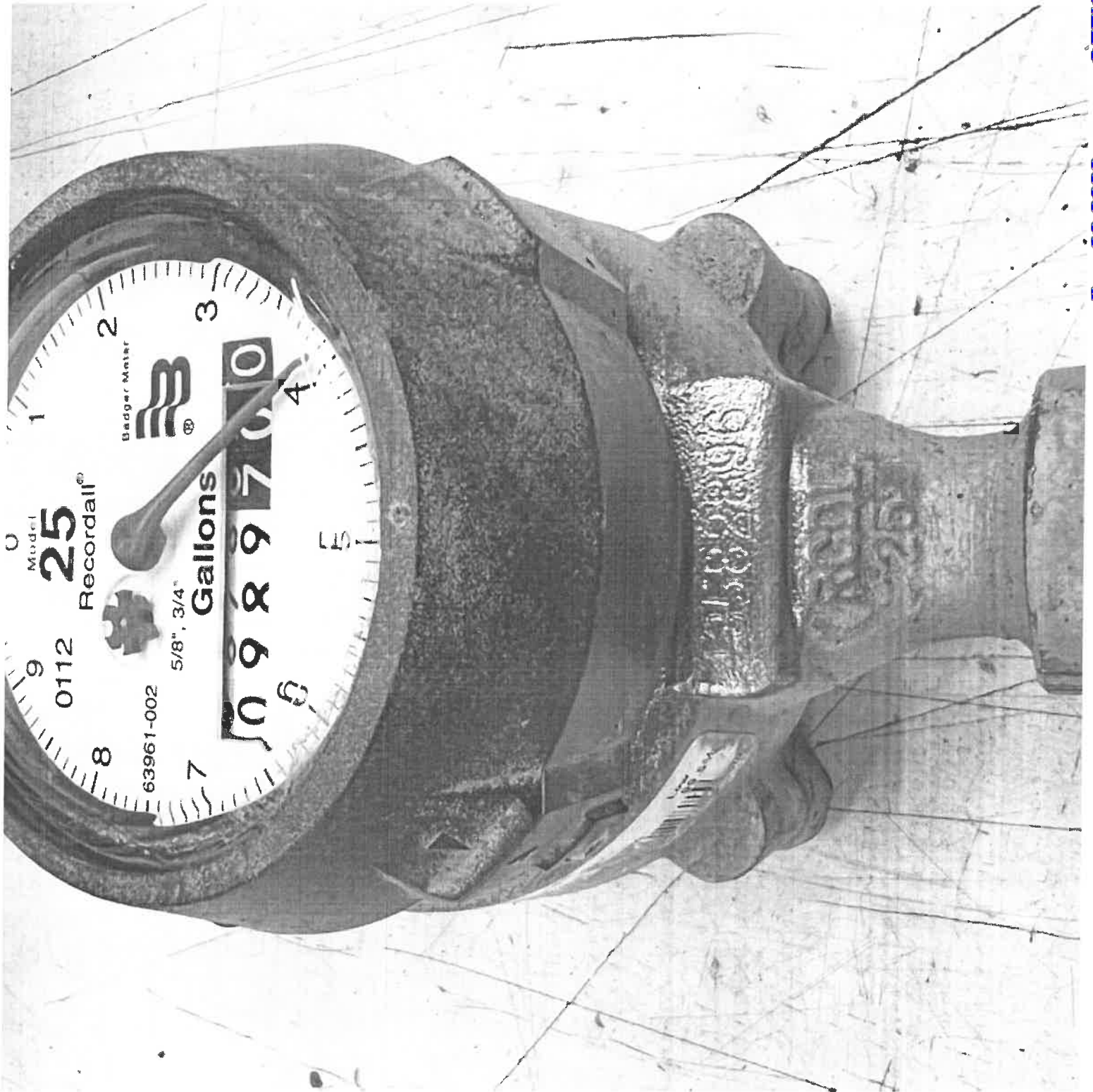


Deborah S. Clark
Communications and Community Engagement Manager

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APR 20 2023







Mid America Meter, Inc.
710 Hamel Road • Medina, MN 55340
Phone: 763-478-8041 • 1-800-324-0365
Fax: 763-478-8043

Meter Test Results

Tested for: Carolina Water Service (NC)

Work Order Information

Work Order: 14389

Test Date: 8/5/2022

Tested by: Connor Czech

Meter Information

Size: 5/8 x 3/4"

Serial Number: 43582896

Manufacturer: Badger

Register Type: Straight R

Model: M25

Registration: USG

Type: Disk/Piston

Location: 393 BayBerry Creek

Register Readings

	Single Register	Dual Register	
		Low	High
Beginning	98,955		
Ending	98,970		

Test Results

Before		After	
GPM	Percent	GPM	Percent
15.00	99.72	0.00	0.00
2.00	100.74	0.00	0.00
0.25	100.89	0.00	0.00

This Meter meets or exceeds the AWWA standards.

Parts

Comments

MAM tests by weight.

Approximately 120 USG used during tests.

10 USG for low and mid flow.

100 USG for high flow.

Average Accuracy is: 100.45%

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APR 20 2023



Mid America Meter, Inc.
710 Hamel Road • Medina, MN 55340
Phone: 763-478-8041 • 1-800-324-0365
Fax: 763-478-8043

Meter Test Results

Tested for: Carolina Water Service (NC)

Work Order Information

Work Order: 14395

Test Date: 8/10/2022

Tested by: Connor Czech

Meter Information

Size: 5/8 x 3/4"

Serial Number: 220745442

Manufacturer: Badger

Register Type: Straight R

Model: M25

Registration: USG

Type: Disk/Piston

Location: 393 Bayberry Creek Cr.

Register Readings

	Single Register	Dual Register	
		Low	High
Beginning	13,221		
Ending	13,236		

Test Results

Before		After	
GPM	Percent	GPM	Percent
15.00	99.94	0.00	0.00
2.00	100.28	0.00	0.00
0.25	99.90	0.00	0.00

This Meter meets or exceeds the AWWA standards.

Parts

Comments

MAM tests by weight.

Approximately 120 USG used during tests.

10 USG for low and mid flow.

100 USG for high flow.

Average Accuracy is: 100.04%

Container type: **WORKSPACE**
Container name: **PS-Consumer Services**Item type: **TICKET**
Item name: **Issue**Created By: **Sara Cummins**
Created On: **09/20/2022 12:26 PM****Date: 11/30/2022 10:44 AM****196871 - Calhoun, Don****Common**

Ticket Number: 196871
Customer Name: Calhoun, Don
Priority: Routine
Status: Closed
Assignee: Sara Cummins
Global: No

Description:**11/07/2022 11:00 AM | Neysa Guerrero**

Formal complaint sent to consumer via certified mail on 11/03/22.

11/03/2022 02:12 PM | Vickie Debnam

Customer is not happy with the outcome of his complaint against Carolina Water. He is requesting to file a FC. Gave the information to Neysa to send to the consumer.

09/20/2022 12:30 PM | Sara Cummins

duplicate of 196594; closing.

09/20/2022 12:26 PM | Sara Cummins

From: Consumer.Services <Consumer.Services@psncuc.nc.gov>
Sent: Tuesday, September 20, 2022 10:00 AM
To: Cummins, Sara J <sara.cummins@psncuc.nc.gov>
Subject: FW: Webform submission from: NCUC Public Staff Complaint Form

Sara,

Please enter the additional information below into footprints under issue number 196594.

Thanks,

Vickie Debnam

From: no-reply@nc.gov <no-reply@nc.gov>
Sent: Tuesday, September 20, 2022 7:56 AM
To: Consumer.Services <Consumer.Services@psncuc.nc.gov>
Subject: Webform submission from: NCUC Public Staff Complaint Form

Submitted on Tue, 09/20/2022 - 07:56

Submitted values are:

1. Have you contacted the company?

Yes

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APR 20 2023

2. Please choose your form:

Utility (electric, water, telephone, natural gas)

Utility Fieldset**Date:**

09/20/2022

Industry:

Water

Utility Company Name:

Carolina Water Service of NC

Name Appearing on Billing Statement:

Don Calhoun

Are you authorized on the account?

Yes

Name of Complainant:

Don Calhoun

Service Address

393 Bayberry Creek Circle

393 Bayberry Creek Circle, Mooresville, North Carolina. 28117

Service Address County

Iredell

Primary Phone #:704-609-0242**Email Address:**don.calhoun47@gmail.com**Description of your complaint:**

Carolina Water Service has been billing us absurd amounts since June of 2022. Our bill went from \$70 to \$771 from May to June. This is happening to 100's of residents in our area. They have changed our meter 5 times. This has not stopped or improved the issue. Our usage is the real problem. They state that we have a leak. We do not have a leak - plumber and irrigation have confirmed. They state we used 600 gallons of water from 1am to 5am while we are all asleep. Their usage amounts are off by 5-10 times. They claim we used 63,000 gallons one month and this last month, 105,000 gallons which is more water than we used all of last year. Again, this is not just us. 7 of our neighbors have this issue. Many more in our neighborhood have this issue. Adjacent neighborhoods have the usage issue. CWS seems intent on continuing to bill us - including over \$1200 for one month of water. 105,000 gallons of water wouldn't fit through their meter much less into our home. CWS increased rates 42% this year is petitioning to increase again 19% in 2023, 5% in 2024, and 5% in 2025. This is unacceptable.

Company's response to complaint:

Everyone must have a leak.

Desired resolution:

Carolina Water Service removed as water supplier. They have a long history of overbilling. At a minimum our bills should be our historic average, not \$771, \$650, \$443, \$1200+.

Additional comments:

NC Utilities Commission has received 100's of complaints from this service area and has yet to do anything about it. Is the commission receiving lobbying money from CWS/Corix? My guess is yes. This is absurd and consumers are being gouged. WCNC Charlotte has done two stories on this for reference.

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

Issue Information

Escalated:	False
Call Back:	False
Spanish:	False
Caller Not Authorized:	False
How Received:	E-Mail
Assistant Referral:	Analyst
Primary Phone:	704-609-0242
Verify Phone:	Yes
Verify Name:	Yes
Industry:	Water
Company:	Unknown/Need More Info
Category:	Service
Sub Category:	Leak
Service Address:	393 Bayberry Creek Circle
Service City:	Mooreville
Service Zip Code:	28117
Service County:	Iredell
Customer Email:	Don.calhoun47@gmail.com
Contacted Company:	Yes
Reminder Sent:	False

Email

Send Email To Assignees:	False
Send Email To Contact:	False
Send Email To CC:	False



Better Business Bureau
9719 Northeast Parkway, Suite 300
Matthews NC 28105
(704) 927-8611
www.charlotte.bbb.org

Case #: 17654339

Sent to Business on: 08/02/2022

Business Info:

Carolina Water Service, Inc. of North
Carolina
4944 Parkway Plaza Blvd STE 375
Charlotte, NC 28217
7045251620

Consumer Info:

Calhoun, Don
393 BAYBERRY CREEK CIR
MOORESVILLE, NC 28117
7046090242
don.calhoun47@gmail.com

Nature of the Complaint: Billing or Collection Issues

Consumer's Original Complaint:

This water utility overbills and leaves no recourse for customers as they send all issues to a 3rd party collection agency.

Our normal water bill is \$60-\$80 per month. I just received a bill for \$711 for one month. Our neighbor has received bills over \$1200 for the last two months. Their normal bill is \$60-\$80. This company has time and time again overbilled our neighborhood with no recourse as they hide behind a collection agency instead of actually having anyone to speak with. If this company won't change their practices I and others are prepared to sue them for overbilling, fraud and our time.

Consumer's Desired Resolution:

Refund; Contact by the business; Provide someone to handle your many issues besides collection agencies disguised as your customer service department.

Sent: 8/3/2022 10:18:51 AM

From:

BBB of Southern Piedmont and Western N.C.

To:

Deborah Clark

Subject:

BBB complaint has been closed

This message originally read on 8/3/2022

Deborah Clark
Carolina Water Service, Inc. of North Carolina
4944 Parkway Plaza Blvd STE 375
Charlotte NC 28217

Re: ID # 17654339 - Don Calhoun

Dear Deborah Clark:

Thank you for your cooperation in responding to the above consumer's complaint.

We forwarded your response to Don Calhoun. Unfortunately, the consumer notified our office that they are not satisfied. BBB has determined your company has addressed the issues within the complaint; therefore we have closed this case in our files. This matter will appear in your BBB Business Profile as: "Answered - The Business addressed the issues within the complaint, but the consumer did not accept the response, OR BBB has not heard back from the consumer as to their satisfaction."

The text of your response may be publicly posted on BBB's website. BBB reserves the right to not post in accordance with BBB policy, and we may edit your response to protect privacy and to remove inappropriate language. In the event the consumer contacts BBB again regarding this issue, we may reach out to you to review any new or additional information we've received from the consumer.

We appreciate your cooperation in addressing this matter and hope we can be of service to you in the future.

Sincerely,

Jaime Cornejo
Operations Support Specialist
jcornejo@charlotte.bbb.org

Iredell County - Real Estate Search



Iredell County Home Page

Basic Search

Real Estate Search

Tax Bill Search

Sales Search

Help

Hide Details...

Owner Last Name: calhoun Owner First Name: Account #:

 MAP BLK PIN CONDO CC LH
 Parcel #:

Tax Year: Current Year

 House # Unit # Direction Street Name Type Suffix Municipality
 Property Address:

Advanced Search

Search Results

click on a parcel number below to continue

Hide Details...

Parcel #	Buildings	Property Address	Account #	Owner Name	Owner Name2	Unit/Type	Legal Description
4666447289,000	1	920 HAMPTON PL	9808600	CALHOUN AUBREY D	CALHOUN LINDA H	1,0000 LT	#7 PT 8 BL 8 W OAKS S-5 PB 9-53
4626168547,000	1	393 BAYBERRY CREEK CIR	77474853	CALHOUN DONALD J	CALHOUN JILL S	0.6920 AC	L357-THE FARMS-PH3-M1-PB-45-114
4821386529,000	1	5137 WILKESBORO HWY	77429774	CALHOUN DOUGLAS R	CALHOUN KATHY A	8,0400 AC	WILLIAMS NC 115
4657734050,000	1	110 LOOKOUT POINT PL	80077394	CALHOUN JARED		0,0900 AC	L113 HIGH RIDGE PB 55-57, PB 57-128 R
4734072035,000	1	118 BERRY ST	77430191	CALHOUN PANELLA HEARD		0,2800 AC	OFF W FRONT ST
4744395455,000	1	223 BROOKDALE DR	77418814	CALHOUN PHILIP L		0,2800 AC	BROOKDALE DR
4741101360,000	1	123 NONNAS WAY	80048786	CALHOUN ROBERT J	CALHOUN SHANNON L	3,5220 AC	L2 NONNA WAY ACRES PB 33-133
4655392500,000	1	191 ALEXANDRIA DR	80069548	CALHOUN THOMAS DUANE	CALHOUN SHIRLEY ANN	0,2920 AC	L110 FOXFIELD P2-PB-62-31

Selected Parcel Info

Hide Details...

Parcel #: 4626168547,000	Neighborhood: 17079 - THE FARMS	Building Value:	634,530
Account #: 77474853	Legal Description: L357-THE FARMS-PH3-M1-PB-45-114	OBXF Value:	49,240
Owner Name: CALHOUN DONALD J & CALHOUN JILL S	Land Units: 0.6920 AC	Land Value:	76,500
Exempt:		Parcel Value Total:	760,270
Exemptions:		Deferred Value:	0
		Taxable Value:	760,270

Land Building OBXF Sales Property Record Cards Owners Tax Bills Tax Codes

BLDG	AYB	EYB	Heated Area	Non-Heated Area	Total Area	Appraised Value	Building Name	Property Address	Use Model	%Good	Base Rate	Replacement Cost New	Strata	Exemptions
BLDG: 1	2012	2012	4,835	1,611	6,446	634,530		393 BAYBERRY CREEK CIR	01 01	93.0%	131.040	682,295		
Building Use/Model Descriptions														
USE							Model				Historic Indicator			
01 - SINGLE FAMILY RESIDENTIAL							01 - SINGLE FAMILY RESIDENTIAL				N/A			
Building Adjustments														
Category	Code	Description	Value	SOVBuildingAdjustmentCategory_DisplayOrder						CountyCode	ValuationYear			
Market/Design	05	FACTOR 05	1.1500							IR	2019			
Quality	5	CUSTOM	1.3000							IR	2019			
Size	Size	Size	0.8700							IR	2019			
Sub Area Information														
Sub Area Type	Description	Actual Area	% Of Base	Effective Area	Replacement Cost New									
BAS	Base Living Area	2,183	100	2,183	286,060									
WDD	Wood Deck	341	020	68	8,911									
FOP	Porch, Open, Finished	311	035	109	14,283									
FUS	Upper Story, Finished	2,652	090	2,387	312,792									
FGD	Garage, Finished, with Door	769	045	346	45,340									
FSP	Porch, Screen, Finished	190	045	86	11,269									
Structural Elements														
Element	Point Value										%			
Air Conditioning Type	03-Central										4,000 100			
Bedrooms/Bathrooms/Half-Bathrooms	5/4/2										19,000			
Exterior Walls	21-Face Brick										35,000 100			
Fireplace	4-2 Sty Single/1 Sty Double/2 Prefab										3640,000 100			
Foundation	3-Continuous Footing										5,000 100			
Heating Fuel	03-Gas										1,000 100			
Heating Type	04-Forced Air - Ducted										4,000 100			
Interior Floor Cover	12-Hdwd/Heart Pine/Lam/LVP										9,000 50			
Interior Floor Cover	14-Carpet										0,000 50			
Interior Wall Construction	6-Custom Interior										32,000 100			
Roofing Cover	10-Composite SHG heavy										5,000 100			
Roofing Structure	03-Gable										7,000 100			
Sub Floor System	4-Plywood										8,000 100			
Bedrooms/Bathrooms/Half-Bathrooms														
Base Area			Upper Level			Lower Level								
Bathrooms	1	3	0											
Bedrooms	1	4	0											
Half-Bathrooms	1	1	0											

Hide Details... Hide Details...

Advanced Search 

Hide Details... Hide Details...

Hide Details... Hide Details...

If you have any questions about the data displayed on this website please contact the Iredell County Assessor's Office at 704-878-5368



Mid America Meter, Inc.
710 Hamel Road • Medina, MN 55340
Phone: 763-478-8041 • 1-800-324-0365
Fax: 763-478-8043

W-354 Sub 414
Denton Affidavit Exhibit 5

OFFICIAL COPY

APR 20 2023

Meter Test Results

Tested for: Carolina Water Service (NC)

Work Order Information

Work Order: 14389

Test Date: 8/5/2022

Tested by: Connor Czech

Meter Information

Size: 5/8 x 3/4"

Manufacturer: Badger

Model: M25

Type: Disk/Piston

Serial Number: 43582896

Register Type: Straight R

Registration: USG

Location: 393 BayBerry Creek

Register Readings

	Single Register	Dual Register	
		Low	High
Beginning	98,955		
Ending	98,970		

Test Results

Before		After	
GPM	Percent	GPM	Percent
15.00	99.72	0.00	0.00
2.00	100.74	0.00	0.00
0.25	100.89	0.00	0.00

This Meter meets or exceeds the AWWA standards.

Parts

Comments

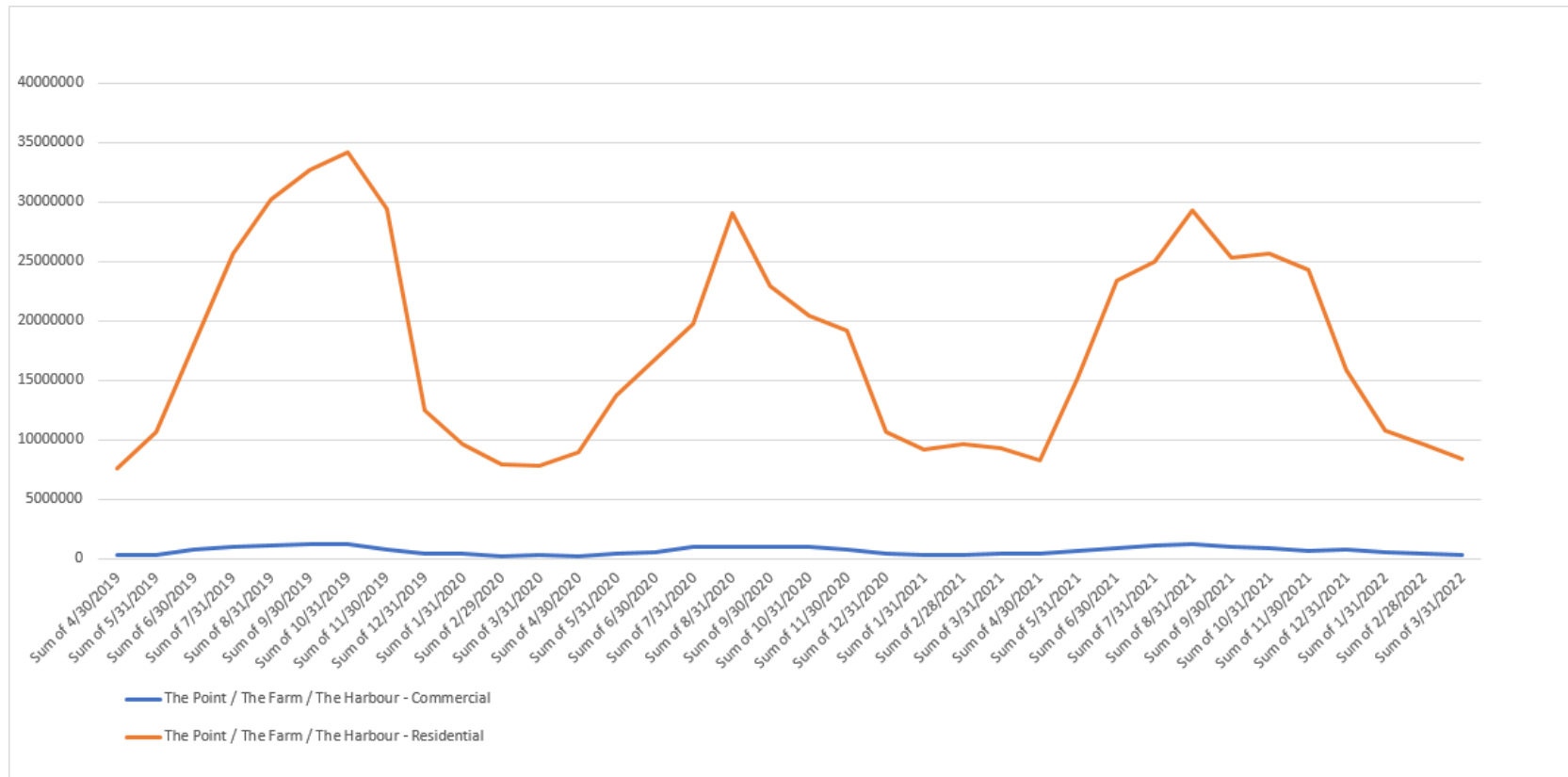
MAM tests by weight.

Approximately 120 USG used during tests.

10 USG for low and mid flow.

100 USG for high flow.

Average Accuracy is: 100.45%



Graphic depicts seasonal usage patterns at The Point, The Farms and The Harbour in Mooresville. All three neighborhoods are served by an integrated water system operated by Carolina Water Service of North Carolina.



Mid America Meter, Inc.
710 Hamel Road • Medina, MN 55340
Phone: 763-478-8041 • 1-800-324-0365
Fax: 763-478-8043

W-354 Sub 414
Denton Affidavit Exhibit 7

OFFICIAL COPY

Apr 20 2023

Meter Test Results

Tested for: Carolina Water Service (NC)

Work Order Information

Work Order: 14395

Test Date: 8/10/2022

Tested by: Connor Czech

Meter Information

Size: 5/8 x 3/4"

Manufacturer: Badger

Model: M25

Type: Disk/Piston

Serial Number: 220745442

Register Type: Straight R

Registration: USG

Location: 393 Bayberry Creek Cr.

Register Readings

	Single Register	Dual Register	
		Low	High
Beginning	13,221		
Ending	13,236		

Test Results

Before		After	
GPM	Percent	GPM	Percent
15.00	99.94	0.00	0.00
2.00	100.28	0.00	0.00
0.25	99.90	0.00	0.00

This Meter meets or exceeds the AWWA standards.

Parts

Comments

MAM tests by weight.

Approximately 120 USG used during tests.

10 USG for low and mid flow.

100 USG for high flow.

Average Accuracy is: 100.04%

HOURLY CONSUMPTION ANALYSIS

August 10, 2022 - August 10, 2022

CALHOUN,DON

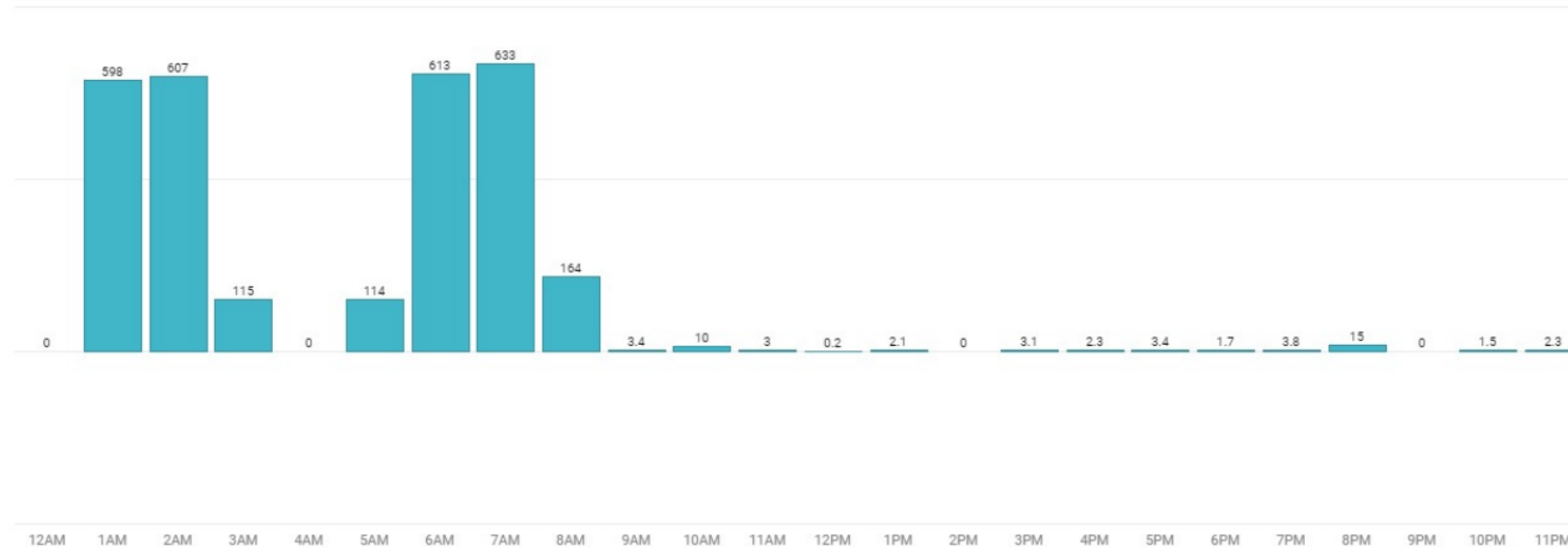
Account Number: 0081608825

Address: 393 BAYBERRY CREEK CIR

MIU ID: 220004806

Meter ID: 11502145

Unit of Measure: Gallons



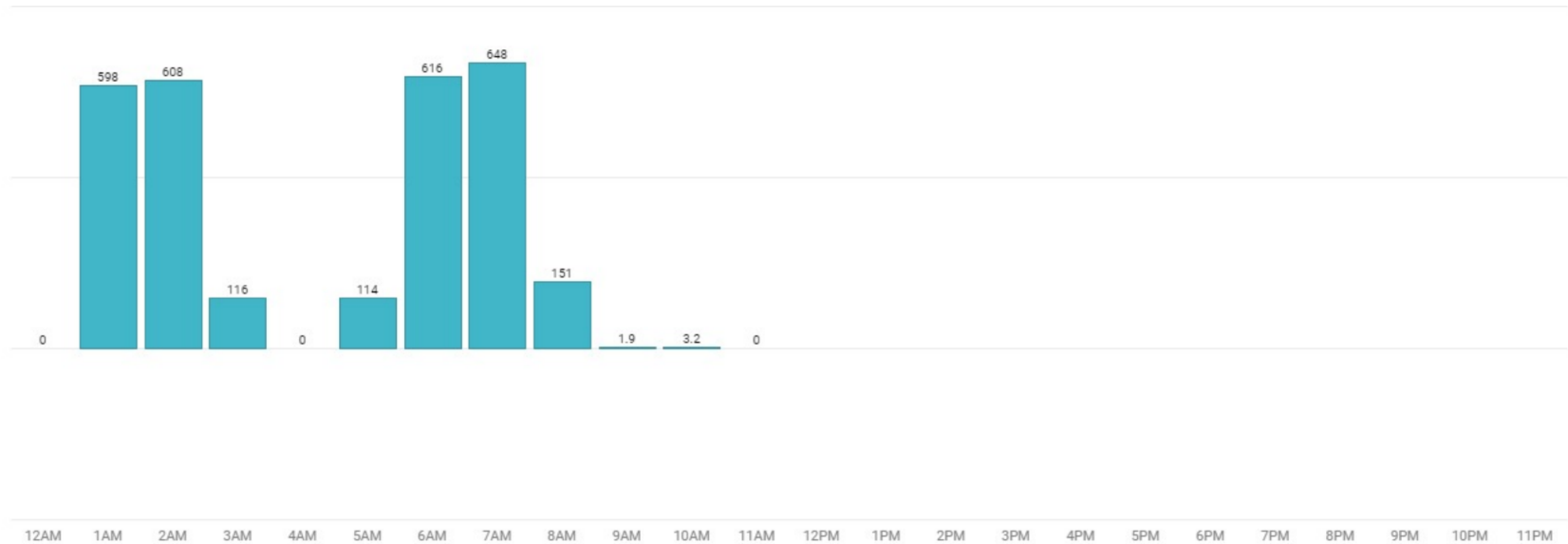
Hour	Consumption	Reading
11PM	2.300	00041852
10PM	1.500	00041829
9PM	0.000	00041814
8PM	15.000	00041814
7PM	3.800	00041664
6PM	1.700	00041626
5PM	3.400	00041609
4PM	2.300	00041575
3PM	3.100	00041552
2PM	0.000	00041521
1PM	2.100	00041521
12PM	0.200	00041500
11AM	3.000	00041498
10AM	10.200	00041468
9AM	3.400	00041366
8AM	164.300	00041332
7AM	633.200	00039689
6AM	613.100	00033357

Hour	Consumption	Reading
5AM	114.100	00027226
4AM	0.000	00026085
3AM	115.200	00026085
2AM	607.300	00024933
1AM	598.100	00018860
12AM	0.000	00012879

HOURLY CONSUMPTION ANALYSIS

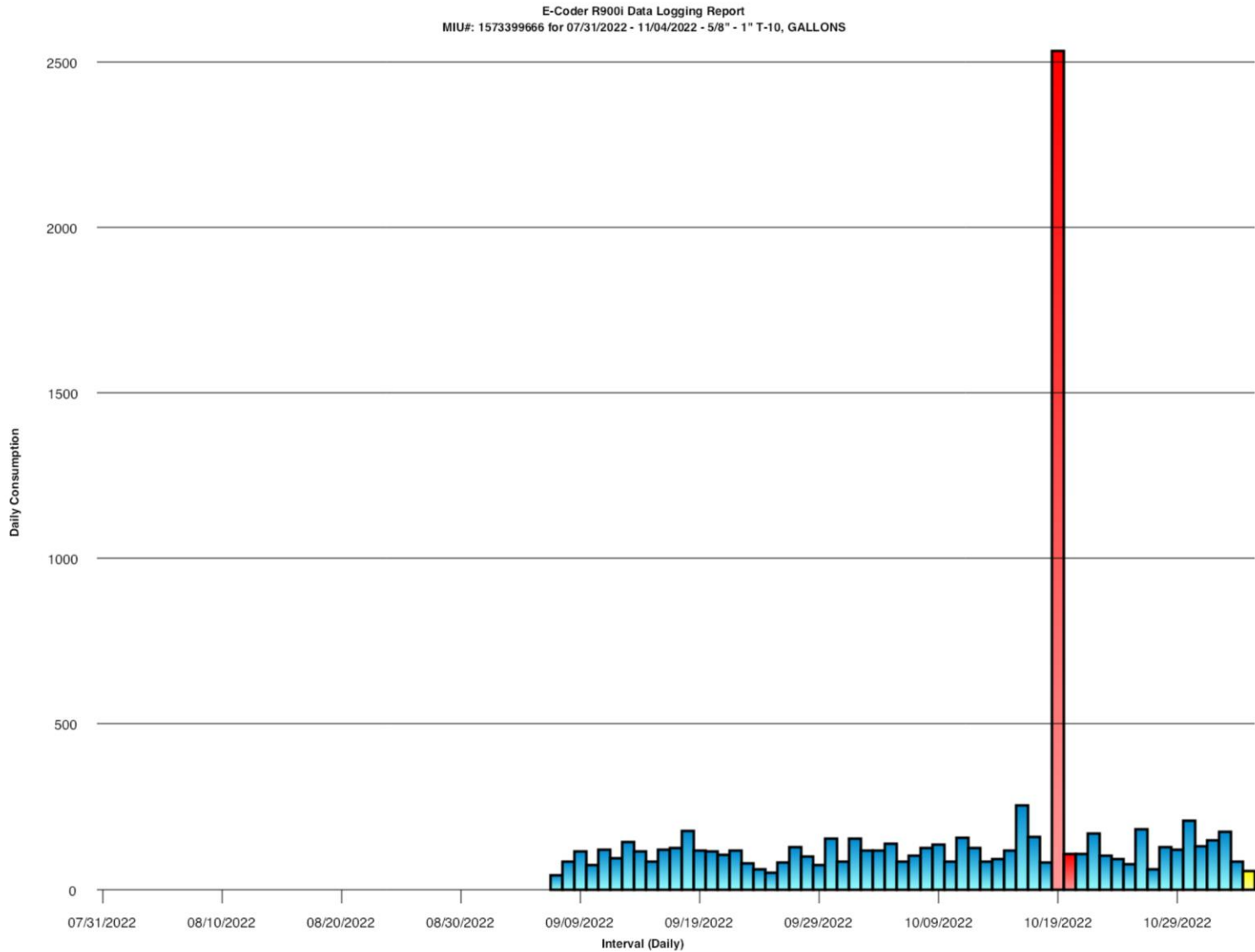
August 12, 2022 - August 12, 2022

CALHOUN,DON
Account Number: 0081608825
Address: 393 BAYBERRY CREEK CIR
MIU ID: 220004806
Meter ID: 11502145
Unit of Measure: Gallons



Hour	Consumption	Reading
11PM		Failure to Retrieve Reading
10PM		Failure to Retrieve Reading
9PM		Failure to Retrieve Reading
8PM		Failure to Retrieve Reading
7PM		Failure to Retrieve Reading
6PM		Failure to Retrieve Reading
5PM		Failure to Retrieve Reading
4PM		Failure to Retrieve Reading
3PM		Failure to Retrieve Reading
2PM		Failure to Retrieve Reading
1PM		Failure to Retrieve Reading
12PM		Failure to Retrieve Reading
11AM	0.000	00091392
10AM	3.200	00091392
9AM	1.900	00091360
8AM	151.000	00091341
7AM	648.100	00089831
6AM	616.300	00083350

Hour	Consumption	Reading
5AM	113.800	00077187
4AM	0.000	00076049
3AM	115.800	00076049
2AM	607.600	00074891
1AM	598.300	00068815
12AM	0.000	00062832



Data Log Report MIU#: 1573399666 for 07/31/2022 - 11/04/2022 - 5/8" - 1" T-10, GALLONS

Interval End Time	Interval Reading	Interval Consumption	Reverse Flow	Consumption Flag
10/18/2022 06:35	4595.3	1.5		
10/18/2022 07:35	4609.8	14.5		
10/18/2022 08:35	4629.3	19.5		
10/18/2022 09:35	4632.5	3.2		
10/18/2022 10:35	4635.6	3.1		
10/18/2022 11:35	4637.1	1.5		
10/18/2022 12:35	4638.9	1.8		
10/18/2022 13:35	4638.9	0.0		
10/18/2022 14:35	4642.1	3.2		
10/18/2022 15:35	4642.2	0.1		
10/18/2022 16:35	4645.8	3.6		
10/18/2022 17:35	4647.6	1.8		
10/18/2022 18:35	4649.8	2.2		
10/18/2022 19:35	4654.4	4.6		
10/18/2022 20:35	4668.1	13.7		
10/18/2022 21:35	4675.0	6.9		
10/18/2022 22:35	4675.0	0.0		
10/18/2022 23:35	4675.0	0.0		
10/19/2022 00:35	4675.0	0.0		
10/19/2022 01:35	5120.6	445.6		
10/19/2022 02:35	5671.4	550.8		
10/19/2022 03:35	5928.4	257.0		
10/19/2022 04:35	5928.4	0.0		
10/19/2022 05:35	5928.4	0.0		
10/19/2022 06:35	6511.3	582.9		
10/19/2022 07:35	7014.5	503.2		
10/19/2022 08:35	7035.6	21.1		
10/19/2022 09:35	7070.7	35.1		
10/19/2022 10:35	7070.7	0.0		
10/19/2022 11:35	7073.7	3.0		
10/19/2022 12:35	7082.5	8.8		
10/19/2022 13:35	7082.7	0.2		
10/19/2022 14:35	7124.1	41.4		Intermittent
10/19/2022 15:35	7126.0	1.9		Intermittent
10/19/2022 16:35	7132.0	6.0		Intermittent
10/19/2022 17:35	7139.4	7.4		Intermittent
10/19/2022 18:35	7166.3	26.9		Intermittent
10/19/2022 19:35	7201.2	34.9		Intermittent
10/19/2022 20:35	7204.8	3.6		Intermittent
10/19/2022 21:35	7210.0	5.2		Intermittent
10/19/2022 22:35	7210.0	0.0		Intermittent
10/19/2022 23:35	7210.0	0.0		Intermittent
10/20/2022 00:35	7210.0	0.0		Intermittent
10/20/2022 01:35	7210.0	0.0		Intermittent
10/20/2022 02:35	7210.0	0.0		
10/20/2022 03:35	7210.0	0.0		
10/20/2022 04:35	7209.9	-0.1		
10/20/2022 05:35	7209.9	0.0		
10/20/2022 06:35	7211.5	1.6		
10/20/2022 07:35	7240.1	28.6		
10/20/2022 08:35	7274.0	33.9		
10/20/2022 09:35	7275.8	1.8		
10/20/2022 10:35	7279.2	3.4		
10/20/2022 11:35	7283.9	4.7		
10/20/2022 12:35	7287.0	3.1		
10/20/2022 13:35	7288.7	1.7		
10/20/2022 14:35	7291.7	3.0		
10/20/2022 15:35	7293.6	1.9		
10/20/2022 16:35	7293.6	0.0		

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APR 20 2023

Response part 2

- 1.) In an attempt to find any reason the usage was 6 times our normal amount, CWS once again claims that irrigation (which was shut off in June) and pool (which doesn't use any water from their line) are suspected to be the cause. 600 gallons passing through the line at 1-3am while we are asleep. Once again, we don't have a leak as witnessed by a licensed plumber and irrigation specialist. Yet somehow we're using 600 gallons of water in the middle of the night after they changed meters. 7 of our neighbors have these extremely high usage amounts also with our direct neighbor being sent bills of \$900 to \$1100 by CWS.
- 2.) CWS says that I declined a workers request to dig up our yard to fix their leaking meter/line to the street. That never happened. I called them twice to have someone come fix this – I certainly didn't tell them not to fix it as our front yard was a mud puddle.
- 3.) 3 people live in our home including a 10 year old boy. CWS would like to say we have a large home with lots of bathrooms and a pool/irrigation so that must be the problem... with zero facts to back up that assertion. A pool was installed last year

yet they keep trying to blame that or "extensive irrigation" which is normal irrigation to everyone else in the world..

- 4.) The Farms neighborhood along with The Point and The Harbour at The Point all have these same issues. They are trying to deflect those issues and focus on lying and still claiming we have a leak. They refuse to answer how 3 large neighborhoods all have these bills over \$500/month to \$1300/month. We have met with the other neighborhoods HOA to determine next steps. This is NOT an isolated issue. CWS refuses accountability for its overbilling based on faulty usage. As a customer I don't care what your tests show, what % of accuracy your lab shows, etc. We've done nothing different regarding water usage for 10 years yet our bill is 7-10 fold our normal bill.

DON CALHOUN FORMAL COMPLAINT CASE
CAROLINA WATER SERVICE, INC. OF NORTH CAROLINA
DOCKET NO. W-354, SUB 414

Denton Direct Exhibit 1 – Updated Graph of Seasonal Usage Patterns and Bills Issued by CWSNC at The Point, The Farms, and The Harbour Water Service Area Served by CWSNC in Mooresville, NC (3 Pages)

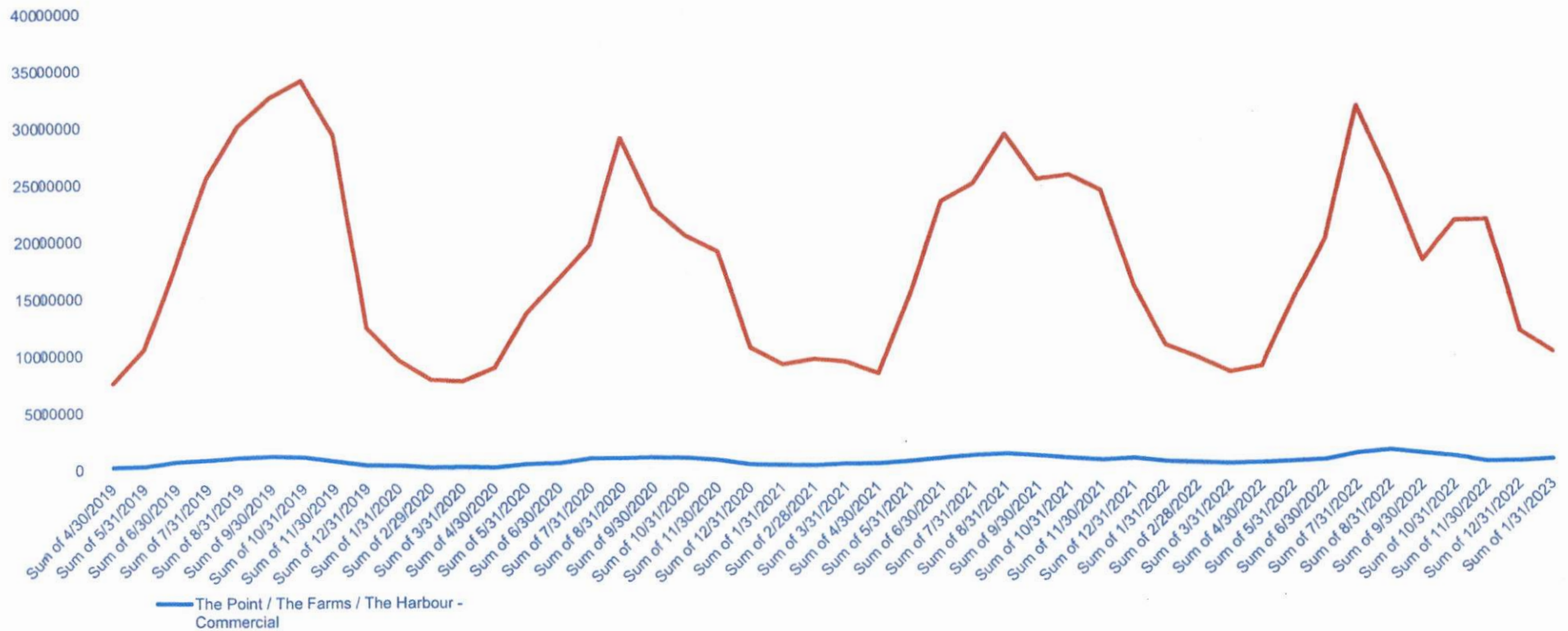
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Apr 20 2023



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of North Carolina™

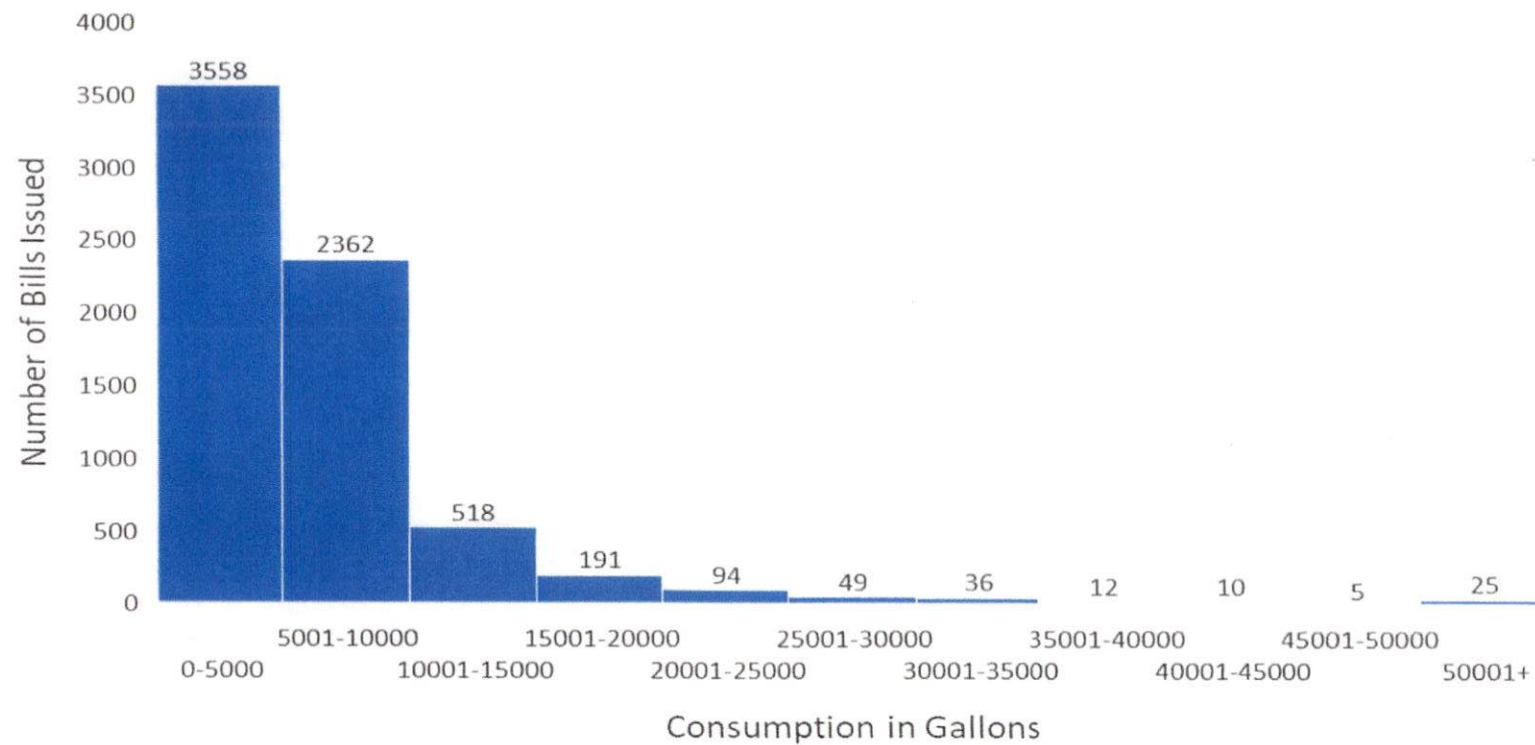
The Point / The Farms / The Harbour - Monthly Usage and Seasonality Curve





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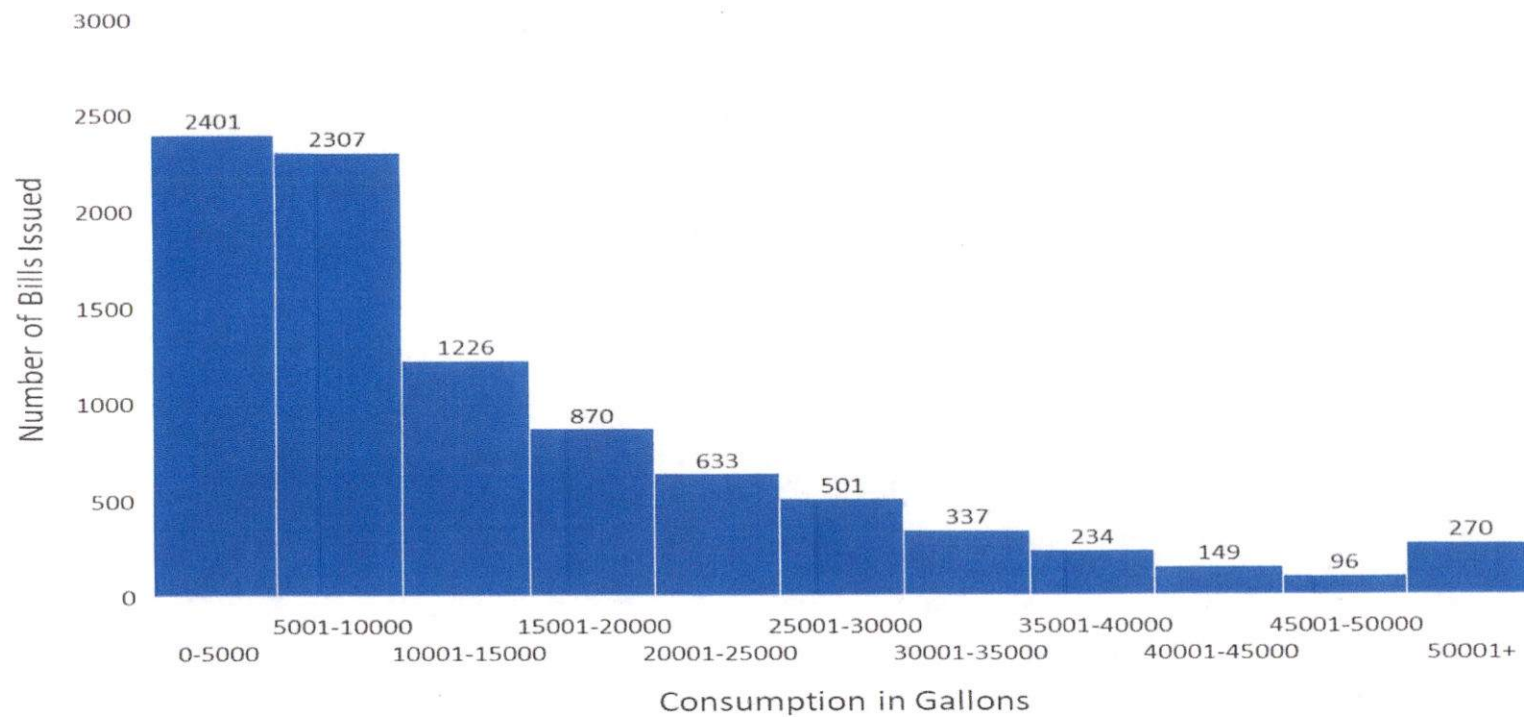
Bills Issued in Non Summer Months
(April 2022, October 2022- February 2023)





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Bills Issued in Summer Months (May 2022 - September 2022)



DON CALHOUN FORMAL COMPLAINT CASE
CAROLINA WATER SERVICE, INC. OF NORTH CAROLINA
DOCKET NO. W-354, SUB 414

Denton Direct Exhibit 2 – Pre-Installation Meter Test Accuracy Test Results for Don Calhoun's Neptune Meter Numbers 11502145, 11502157, and 13444812 (3 Pages)

Digital meter
2 AMT
8 PM

Neptune Test Results

Serial Number	Customer Number	MIU Number	High Flow	Int Flow	Low Flow	Order Number
11502145			0998	0991	0989	S350975

This meter operated at Mr. Calhoun's property from August 5 to August 12, 2022

Neptune Test Results

Serial Number	Customer Number	MIU Number	High Flow	Int Flow	Low Flow	Order Number
11502157			1001	0996	0997	S350975

This meter operated at Mr. Calhoun's property from August 12 to September 7, 2022

Neptune Test Results

Serial Number	Customer Number	MIU Number	High Flow	Int Flow	Low Flow	Order Number
13444812		1573399666	0999	1000	1000	S364774

This meter was installed at Mr. Calhoun's home on September 7, 2022 and remains in operation as of March 15