

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

June 21, 2024

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

Via Electronic Delivery

Re: Carolina Water Service, Inc. of North Carolina
Request for Release of Bonds and Certificates of Deposit Sureties
Originally Filed for Amherst Subdivision and the Carolina Pines
Service Area and Shift of Bond Coverage to Irrevocable Standby
Letter of Credit
Docket Nos. W-354, Subs 433, 326 and 360, W-1152, Sub 8, and
W-1151, Sub 7

Dear Ms. Dunston:

On March 22, 2024, Carolina Water Service, Inc. of North Carolina (CWSNC or Company) filed a letter with the Commission in Docket No. W-354, Sub 433 seeking approval to increase its posted bond amount by \$250,000. At that time, CWSNC had \$4,270,000 of bonds posted with the Commission, comprised of the following sureties: (1) a \$3,730,000 irrevocable standby letter of credit from Toronto-Dominion Bank approved in Docket No. W-354, Sub 350 by order issued on September 27, 2016; (2) two \$20,000 certificates of deposit with Truist approved in Docket No. W-354, Sub 360 by order issued on May 17, 2019; (3) a \$500,000 irrevocable standby letter of credit from Toronto-Dominion Bank approved in Docket No. W-354, Sub 377 by order issued October 26, 2020 (original amount of \$250,000) and Docket No. W-354, Sub 429 issued on December 19, 2023 (Amendment No. 1 increasing the amount by \$250,000 to a total of \$500,000). CWSNC sought to increase the then-current \$500,000 irrevocable standby letter of credit with Toronto-Dominion Bank approved by the Commission in Docket No. W-354, Sub 429, by \$250,000 to \$750,000.

On April 12, 2024, the Commission entered an *Order Accepting and Approving Bond and Surety and Releasing Bond Form* in the Sub 433 docket. By

that Order, the Commission found good cause to accept and approve the increased bond and surety from Toronto-Dominion Bank filed by CWSNC on March 22, 2024, and to release Bond Form Appendix A-2 previously filed by CWSNC in Docket No. W-354, Sub 429. The Commission further noted that acceptance of that bond filing increased CWSNC's posted bond amount by \$250,000, resulting in a total posted bond amount of \$4,520,000, of which \$340,000 remains unassigned.

CWSNC respectfully requests that the Commission now release to the Company the two \$20,000 certificates of deposit¹ with Truist approved in Docket No. W-354, Sub 360 by order issued on May 17, 2019, and shift that bond requirement for coverage under the current \$750,000 irrevocable standby letter of credit with Toronto-Dominion Bank (of which \$340,000 is currently unassigned).

I hereby certify that I have today served a copy of this filing on the parties to these proceedings.

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

Electronically Submitted

/s/Jo Anne Sanford

North Carolina State Bar No. 6831

Attorney for Carolina Water Service, Inc. of
North Carolina

c: Parties of Record
Joann Snyder

¹ The two \$20,000 bonds and certificates of deposit were originally filed to cover the Amherst Subdivision and the Carolina Pines Service Area. The history of these transactions is found in Docket Nos. W-354, Subs 433, 326, and 360, W-1152, Sub 8, and W-1151, Sub 7.