

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-1073, SUB 7  
DOCKET NO. W-354, SUB 396

In the Matter of:	)	
	)	
Application by Carolina Water Service, Inc. of	)	<b>Petition to Intervene of</b>
North Carolina and Water Resource	)	<b>James D. Moore, III</b>
Management for Authority to Transfer the	)	
Echota Water Utility System, the Seven Devils	)	
Water Utility System, the Seven Devils	)	
Wastewater Utility System and Public Utility	)	
Franchise in Watauga County, North Carolina,	)	
and for Approval of Rates	)	

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On behalf of myself, I petition to intervene in the above captioned matter as a customer of the Seven Devils Wastewater System. In accordance with Commission Rule R1-19, I state the following:

1. My name is James D. Moore, III, and my address is 205 Little Boulder Lane, Seven Devils, North Carolina 28604. My email address is [jdmooore7d@gmail.com](mailto:jdmooore7d@gmail.com).
2. I am a wastewater customer of the Seven Devils Wastewater Utility System.
3. The rate increase requested by Carolina Water Service, Inc. of North Carolina in this proceeding is substantial and if it is allowed it will materially increase my sewer bill. As such, I have a direct interest in the subject matter of this proceeding.

4. I am the President of the Lake Community Property Owner's Association, which contains 70 of the 149 Seven Devils wastewater customers, but I'm intervening as an individual customer.

Additionally, I wish to make the following key points at this time.

#### **Key Points**

- 1- Purchase price \$70,000 and no assumption of any debt.
- 2- 1 year payback based on rate proposed.
- 3- No cost-of-service study for the collection system and package treatment plant.
- 4- The current treatment system is in material compliance with the NCDENR wastewater discharge permit.
- 5- No capital expenditures are forecasted by Carolina Water Services in years 0-5.
- 6- The basis for the proposed wastewater rate is from a Carolina Water Services General State-wide rate case that did not include Seven Devils.
- 7- The Town of Seven Devils provides metered water service for the The Lakes Community and in 2004 when I built my cabin the base rate was \$30 per month and today the rate is \$40 per month.
- 8- All wastewater collection and treatment systems are not the same, and I strongly disagree that a uniform rate from a previous case be applied.
- 9- In a 2022 rate case in Docket No. W-354, Sub 384 the uniform wastewater flat rate for customers using 4000 gallons per month increased from \$74.36 to \$85.12. Individual service area wastewater rates were approved in this rate case and examples follow:  
College Park with 51 customers decreased from \$71.17 to \$59.80, Kings Grant-Charlotte

with 177 customers decreased from \$57.65 to \$46.28, White Oak Plantation with 509 customers decreased from \$64.07 to \$54.52 and Fairfield Mountain with 392 customers increased from \$111.69 to \$118.72 per month.

10- If rates that are proposed by Carolina Water Services in the upcoming 3 year rate case under Docket No. W-354, Sub 400 are approved and I do not intervene in this case, my monthly wastewater bill will exceed \$110 per month in 3 years.

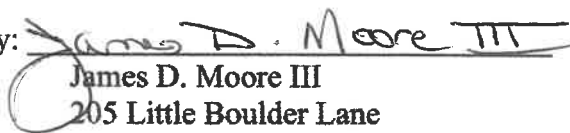
11- Carolina Water Services signs are already in place on the pump stations and package wastewater treatment plant and they may already be operating the system and have recent operating cost data.

12. A customer hearing has been scheduled by the Commission on November 1, 2022, in Boone, NC at the Watauga County Courthouse. I strongly recommend that this hearing take place so individual customers can voice their concerns.

**Statement of Exact Relief Desired**

1. I ask that my petition to intervene in this matter be granted.
2. I ask the North Carolina Utilities Commission to deny the proposed wastewater increase by Carolina Water Services, Inc.

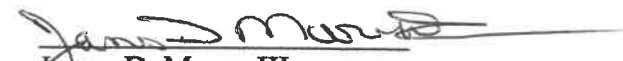
Respectfully submitted, this 12 day of October, 2022

By:   
James D. Moore III  
205 Little Boulder Lane  
Seven Devils, North Carolina 28604  
[jdmoore7d@gmail.com](mailto:jdmoore7d@gmail.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the Petition to Intervene of James D. Moore, III has been served by electronic mail (e-mail), hand delivery, or by depositing a copy in the United States Mail, first class postage prepaid, properly addressed to parties of record.

This, the 12 day of October, 2022.

  
James D. Moore III  
205 Little Boulder Lane  
Seven Devils, North Carolina 28604  
[jdmoore7d@gmail.com](mailto:jdmoore7d@gmail.com)