

**SANFORD LAW OFFICE, PLLC**

Jo Anne Sanford, Attorney at Law

October 24, 2022

A. Shonta Dunston, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

**Via Electronic Delivery**

Re: Docket No. W-354, Sub 400  
Application by Carolina Water Service, Inc. of North Carolina for  
Authority to Adjust and Increase Rates and Charges for Water and  
Sewer Utility Service in All Service Areas of North Carolina and  
Approval of a Three-Year Water and Sewer Investment Plan  
--Response to Customer Concerns From Raleigh Public Hearing

Dear Ms. Dunston:

Attached for filing please find Carolina Water Service, Inc. of North Carolina's response to the customer concerns expressed at the Raleigh public hearing, held in the Dobbs Building on Monday, October 3, 2022.

As always, 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**

N.C. State Bar No. 6831

Attorney for Carolina Water Service, Inc.  
of North Carolina

P.O. Box 28085

Raleigh, North Carolina 27611-8085

Cell: 919.210.4900

e-mail: [sanford@sanfordlawoffice.com](mailto:sanford@sanfordlawoffice.com)

c: Parties of Record

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. W-354, SUB 400

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of  
Application by Carolina Water Service, )  
Inc. of North Carolina for Authority to )  
Adjust and Increase Rates and Charges ) **REPORT ON CUSTOMER**  
for Water and Sewer Utility Service in All ) **COMMENTS FROM PUBLIC**  
Service Areas of North Carolina and ) **HEARING HELD IN RALEIGH,**  
Approval of a Three-Year Water and ) **NORTH CAROLINA ON**  
Sewer Investment Plan ) **OCTOBER 3, 2022**

**NOW COMES Carolina Water Service, Inc. of North Carolina** (“CWSNC” or “Company”) and files this report in response to customer concerns raised at the Raleigh public hearing held by the North Carolina Utilities Commission (“NCUC” or “Commission”).

The public hearing was convened at 7:00 p.m. on Monday, October 3, 2022, in the Dobbs Building, 430 North Salisbury Street, in Raleigh, North Carolina. Commissioner Karen M. Kemerait presided on behalf of the North Carolina Utilities Commission (“NCUC” or “Commission”) and was joined by Commissioners ToNola D. Brown-Bland, Kimberly W. Duffley, Floyd B. McKissick, Jr., Jeffrey A. Hughes, and Charlotte A. Mitchell, Commission Chair.

Staff Attorney John D. Little appeared for the Public Staff on behalf of the using and consuming public, accompanied by Gina Holt, Manager in the Legal Division of the Public Staff, Charles Junis, the Director of the Water, Sewer, and Telephone Division of the Public Staff, and Shashi Bhatta, Engineer with the Water

and Sewer Division of the Public Staff. Jo Anne Sanford of Sanford Law Office, PLLC appeared on behalf of the Company, joined by CWSNC State President Donald Denton.

#### **A. INTRODUCTION AND ORGANIZATION OF REPORT**

The Company values this opportunity to hear from concerned customers across its service areas and appreciates its responsibility to investigate and respond. This report will discuss a number of principles and facts that impact both the Company's service obligation and the rules that apply to the rate-setting process for public utilities such as CWSNC, assuring protections to customers and fair compensation to the utility. These general principles are addressed in the following section and are referred to throughout as "General Responses." The Company's General Responses pertain to important topics such as proposed rates, "cost of service ratemaking," the rigorous audit process underway in this proceeding, rate comparisons among providers, legal compliance regarding notice, level of service inquiries, investment in replacing aging infrastructure, and water quality (both primary and secondary).

#### **B. CWSNC GENERAL RESPONSES TO GENERAL CUSTOMER CONCERNS**

1. Proposed Rates – The legal principles that govern ratemaking are set forth in North Carolina General Statutes, Chapter 62, and in rules promulgated by the North Carolina Utilities Commission under those statutes. By law, CWSNC receives a rate increase only if it proves, following an investigation by the Public Staff (and any Intervenor opposition), that such an increase is

authorized under the law, based on the actual cost and level of prudent and reasonable investment in plant and operation. Further, under the Water and Sewer Investment Plan (“WSIP”) paradigm, the Commission may only authorize rate changes based on reasonably known and measurable capital investments and anticipated reasonable and prudent expenses, provided the Commission finds the WSIP results in rates that are just and reasonable and in the public interest. Moreover, in reviewing a WSIP application, the Commission must consider whether the water or sewer utility’s application, as proposed: (1) establishes rates that are fair both to the customer and to the water or sewer utility; (2) reasonably ensures the continuation of safe and reliable utility services; (3) will not result in sudden substantial rate increases to customers annually or over the term of the plan; (4) is representative of the utility’s operations over the plan term; and (5) is otherwise in the public interest. From filing of a rate increase application until issuance of a final Commission order can take 300 days; much of that time is spent in a rigorous audit by the Public Staff and a thorough review of all evidence, conducted in a judicial proceeding by the Commission. The burden of proof in support of the request is on the utility.

2. Rate Comparisons – An attempt to make meaningful comparisons between statewide average costs for all water and wastewater service providers and the costs of a provider like CWSNC generally results in an “apples to oranges” assessment. The core distinction is found in the concept of

“economies of scale.” The costs of serving an individual customer in Raleigh or Charlotte, by a governmental utility enterprise, will likely on average be less than the cost of serving the typical CWSNC customer. The urban areas are densely populated, they generally source water from large surface impoundments or rivers, they treat waste in large central treatment facilities, governmental entities tax their citizens, and they are often not required to utilize “cost-of-service” ratemaking, as are the utilities regulated under Chapter 62 of the General Statutes. Contrast this to the areas served by CWSNC and others like it: often rural, far less densely populated, and frequently served by smaller wastewater treatment plants and by hundreds of wells, drawing water up from rock and dispersed across the state. The difference in cost attributes is obvious and should inform any conversation about comparisons in respective average costs.

3. Legal Compliance Regarding Notice – In a general rate case, the Public Notice to customers is prescribed by the requirements of statute and is issued by the Commission, based upon the input of CWSNC and the Public Staff. It is a joint effort to provide specific information to all customers about current and proposed rates. In a general rate case like this, the length and complexity of the Public Notice serves the purpose of detail and transparency yet may be daunting to many customers who attempt to understand all its contents and the personal impact.

With respect to the timing and means of customer notice in this particular case, CWSNC undertook, on its own volition, to activate a series of its communications mechanisms to provide additional layers of notice to customers and to owners' associations to alert them to their opportunity to be heard at the public hearing.

4. Investment in Replacing Aging Infrastructure – As documented by the U.S. Environmental Protection Agency (“EPA”) and the American Water Works Association (“AWWA”), and the American Society of Civil Engineers (“ASCE”), significant investment is needed throughout North Carolina—more than \$20 billion over the next 20 years—to replace aging water and wastewater infrastructure, including drinking water pipes, wastewater collection pipes, lift stations, and wastewater treatment facilities.
5. Water Quality – Water quality can be impacted by, among other things, unplanned water main breaks, unexpected malfunctioning of equipment, and challenges when implementing capital projects. CWSNC is intently focused on providing a high level of service and compliance with primary drinking water quality standards. The Company’s latest Annual Water Quality Reports are located on its website for review.
6. Secondary Water Quality – The Company is also committed to a high level of service regarding secondary water quality standards. Secondary water quality standards address substances that may impact the taste, odor, or color (i.e., the “aesthetics”) of a customer’s drinking water.

- a. Iron – The Company regularly tests for Iron to ensure levels are below the Maximum Contaminant Level (“MCL”) of 0.3 parts per million (“ppm”).
- b. Hardness – Hardness reflects the relative amounts of calcium and magnesium ions within drinking water. Generally, “hard water” can be found throughout North Carolina, including in coastal areas served by groundwater. It is not uncommon for homeowners served by public and private drinking water systems to own and deploy drinking water softeners. However, hardness is not regulated by the North Carolina Department of Environmental Quality. The Company’s experience is that many drinking water customers possess their own drinking water softeners. Historically, the Company has heard from customers with in-home drinking water softeners that they do not wish to pay for—i.e., subsidize—an expensive system-wide water softener to support other customers within the community who do not have an in-home water softening system. In summary, traditionally, the Company leaves drinking water hardness solutions to the individual preferences of its customers, unless a clear and substantial demand for such a capital investment is made by a community.
- c. The Company’s On-Going Commitment to Water Quality – The Company is committed to providing the highest level of service to

customers, especially regarding water quality. The Company continues to implement its annual flushing program.

7. Customer Assistance – Testimony objecting to rate increases raises the issue of affordability and of assistance to customers with paying bills. CWSNC recognizes the difficulties that some customers face due both to the lingering financial impacts of the COVID 19 pandemic and to the continuing upward pressure on rates. The Company has undertaken a number of measures to help mitigate these concerns. Examples of some measures follow:

- Responding to the pandemic, CWSNC implemented an effective outreach program from the suspension of disconnects through the restart of them (which the Company delayed for a full two months beyond the Commission mandate). The effort targeted customers who needed assistance with bill payments, urging them to contact the Company, and the information was disseminated through the Company’s website, social media accounts, and bills. CWSNC added an online portal on its *My Utility Connect* online application to assist customers in choosing the appropriate payment arrangements and payment plans, based on their ability to pay (this also eased the call volume for the Company’s Customer Experience Department). CWSNC continues its outreach to customers as the need for assistance with payment options is ongoing.



- CWSNC maintains an extensive Homeowner Association, Property Owners Association, and Property Management Company database, used to send frequent email and phone updates. This database enhances the Company's ability to reach customers with messages, including the ability, in this rate case, to counter the possibility of delayed USPS delivery of notice of the public hearings. Specifically, CWSNC scheduled in-person meetings with several HOA/POA communities, including The Farms, The Point, The Harbour, Fairfield Harbour, Brandywine Bay, and Carolina Trace, Bradfield Farms, Sugar Mountain, Skyleaf, Sherwood Forest, Village of Nags Head, and Mountain Air. Phone calls were conducted throughout the year with POA/HOA presidents and property management companies such as Sugar Top, Sugar Mountain, Elk River, Skyleaf Condos, Connestee Falls, Sapphire Valley, and Lake Lure.
- In addition to exceeding the requirements of the NCUC's orders in Dockets No. M-100, Sub 158 concerning disconnect, CWSNC raised the amount that triggers disconnection from \$100 to \$300.
- CWSNC participates in the NC HOPE Program. See <https://www.rebuild.nc.gov/hope-program>. The NC Housing Opportunities and Prevention of Evictions ("HOPE") Program is managed by the North Carolina Office of Recovery and Resiliency, a division of the state Department of Public Safety. HOPE provides rent and utility bill assistance to low-income renters who have been financially impacted by the COVID-

19 pandemic. The program is committed to helping North Carolina renters stay safe in their homes by preventing evictions and loss of utility services.

- The Company currently participates in the Low Income Household Water Assistance Program (“LIHWAP”). See <https://www.ncdhhs.gov/divisions/social-services/energy-assistance/low-income-household-water-assistance-program-lihwap>. LIHWAP is a federally-funded program that provides emergency assistance to low-income households, particularly those with the lowest incomes, that pay a high proportion of household income for drinking water and wastewater services. The State of North Carolina initiated the program through its local county Health and Human Services offices in December 2021, and CWSNC has accepted payments of over \$82,000 for 242 customer accounts to-date.
- The Company provides customers, through its website and social media, information on non-profit entities offering payment assistance, such as Crisis Assistance Ministries and United Way.
- Specific information concerning all aspects of customer assistance were developed for CWSNC’s Customer Experience Team – the Company’s first point of contact with the customers.
- Most recently, CWSNC has implemented a Water Efficiency Program which provides efficient water fixture rebates to customers. Additionally, CWSNC was authorized to enable fee-free payment for residential customers.

8. Communications Generally – CWSNC invests significantly in a robust communications strategy, understanding the need for two-way interaction with customers for matters including customer assistance, and extending beyond that to service and internal operations. Components of this system and examples of its operation include the following:

- CWSNC maintains an extensive Homeowner Association, Property Owners Association, and Property Management Company database to send frequent e-mail and phone call updates. This database enhances the Company's ability to reach customers with messages of all types.
- Information in the various databases is used to support contacts with customers about service issues, boil water notices, upcoming restrictions on service due to required maintenance or repairs, advice related to weather-related and other emergencies, billing assistance, and a variety of other matters.
- The database, utilized to target e-mails and phone calls to individual customers as well as to the various representative organizations, is key to the Company's ability to provide critical and timely information to customers. For example, in this current proceeding, CWSNC initiated outreach through My Utility Connect via email and posted the public hearing information to the front page of the CWSNC website to supplement the required Commission notice virtual public hearing. The Customer Experience Team was prepared with helpful information in the event customers contacted the

Company for the public hearing information. To attempt to ensure notice was received more timely by a broader range of customers---particularly in light of the USPS's publicly known issues regarding timely delivery of even first-class mail---the Company voluntarily activated various modes of information delivery to provide supplemental notice of the hearings to as many customers as possible. The Community Management Companies and the Homeowners and Property Owners Board Presidents were emailed the notice ahead of the mailing in order to share in their various communications methods.

- CWSNC improves its capacity to communicate with customers by building and maintaining relationships with the various homeowner/property owners' ("HOA" and "POA") associations in its service territories, by regular postings on its website, and by maintaining 15 separate WordPress web-based pages for the largest HOA/POA communities.
- Additionally, the Company operates the aforementioned *My Utility Connect*, which is an application that allows customers to choose their preferred method of notifications---through e-mail, text, or phone call. Customers can also start/stop service, pay bills, and monitor monthly usage at any given time.
- Finally, and most significantly, CWSNC communicates directly and on a 24/7 basis with its customers through the Customer Experience Team. This Customer Experience Team is dedicated to providing support and

assistance on a wide range of topics from billing and payment assistance, to work orders for main breaks. The team for North Carolina is located in the Charlotte, North Carolina office at 5821 Fairview Road. Operationally, the Company has developed a regionalized support model to offer more localized customer expertise and support. Prior to this change, a CWSNC customer calling for support might have been routed to a Corix customer support representative (“CSR”) located in any Corix location. In contrast, now a CWSNC customer will be directed to a local CSR. The Company submits this is a better model and provides improved customer service support for the current and future needs of customers. A closer connection to the communities CWSNC serves will enable the Company to provide better information and superior efforts to understand and solve customers’ problems.

### **C. OVERVIEW OF THE RALEIGH PUBLIC HEARING**

Two witnesses testified, both from Carolina Trace. Each witness expressed concern with the multi-year rate plan. They also were concerned that the relief proposed by the Company would raise base charges that were lowered in the prior rate case. Certain concerns about customer notice and other items were also brought forward.

**D. SPECIFIC RESPONSES TO CUSTOMER TESTIMONY FROM RALEIGH**

**David Smoak, Carolina Trace, 96 North Ridge Trail, Sanford, North Carolina, Tr., pp. 15-29.**

Mr. Smoak introduced himself as the President of Carolina Trace Association. Mr. Smoak initially expressed appreciation for the utility services delivered by the Company, for providing emergency services when water breaks occur in the community, for investment in numerous infrastructure projects to manage waste, for starting a rebate program to reward customers who install home appliances to conserve water, and by having become more flexible dealing with payment issues and decreased shut-offs during COVID.

However, Mr. Smoak objected to the proposed rate increase. He stated that the rate increase would reverse the lowering of base rates that occurred in the most recent rate case. Mr. Smoak was concerned this would not promote water conservation. Mr. Smoak suggested seeing how usage rates have been impacted under the current rate structure which does reward conservation, or allowing a base usage allowance before variable usage rates would kick in. In response to questions from Chair Mitchell regarding the conservation, Mr. Smoak stated that his neighbors also would be interested in knowing if the current rate structure has led to decreased water usage. *Tr. p. 27, line 7 - p. 29, line 1.*

Mr. Smoak objected to the provision of the Company's notification. He testified it was difficult for each community to tell what its proposed increase is per the notice. Mr. Smoak acknowledged that the supplemental letter sent from Mr.

Don Denton explaining the Company's reasoning was helpful. Nonetheless, Mr. Smoak asked that the notice document be improved. In response to questions from Chair Mitchell regarding the notice document, Mr. Smoak suggested that each specific community, such as Carolina Trace, have the proposed rates both water and sewer rates listed together. He suggested the notice document could also be organized community-by-community, showing existing and proposed rates. *Tr. p. 25, line 3 - p. 27, line 6.*

Mr. Smoak objected to any multi-year rate increase. As uncertain economic times are difficult on customers, Mr. Smoak suggested the any increase be tied to certain economic indicators, such as CPI, PPI , or other inflationary statistics.

Finally, Mr. Smoak contended that the requested "fair return of up to 10.7 percent" is akin to a cost-plus type of contract. Mr. Smoak stated that cost-plus incentive programs do not encourage innovative ways to avoid costs.

Mr. Smoak supplemented his oral testimony with a two-page written statement which was admitted into the record.

#### **CWSNC's Response to Customer Smoak:**

CWSNC appreciates thoughtful comments from customers like Mr. Smoak. Specifically, CWSNC appreciates Mr. Smoak's testimony indicating that CWSNC has provided emergency services, invested in numerous infrastructure projects, starting a rebate program to reward customers who install home appliances to conserve water, and having become more flexible with payment issues and decreased shut-offs during the pandemic.

In response to Mr. Smoak's testimony in opposition to the proposed rate increase, any base facilities charges modification is intended to reflect, as much as possible, the fixed costs of the facilities required to provide service. To be clear, CWSNC has not proposed a change in the ratio of fixed revenues to volumetric revenues as was approved in the last rate case. Stated differently, to the extent that there are base charge increases they are in a similar relation to the volumetric charge increase as has been previously approved. Moreover, these are static amounts and do not disappear when residents are away. The system must be able to provide service on demand, whether or not the customer is there to exert a demand for usage.

In response to Mr. Smoak's testimony regarding difficulty understanding the notice document, the Company states that the complexity of the notice is a function of the number of systems and separate rates. It would be very difficult, and more expensive, to provide individually labeled rate sheets for the approximately 100 systems in uniform rates. However, should the Commission order CWSNC to modify the notice document in future rate cases in a fashion that improves customer understanding, CWSNC would certainly accommodate.

In response to Mr. Smoak's opposition to the WSIP plan due to economic uncertainty, CWSNC believes that the three-year WSIP actually provides a longer-term view of costs and investments for customers, regulators, and stakeholders alike. Further, the WSIP provides some level of rate certainty over the rate years applicable to the plan. A WSIP allows customers and regulators a longer-term view



of the utilities investment and management plans and therefore encourages a discussion about the utilities investment plans. We believe this is of value when significant investments are on the short and long-term horizon, as is the case with CWSNC's aging infrastructure. By comparison, a single test year model sets rates for only the test year; the focus is on representative expenditures and costs which limits insight into investment cycles that span several years.

Finally, CWSNC disagrees with Mr. Smoak's characterization of the proposed rate increase as essentially a cost-plus contract. While there may be some conceptual overlap, both the current regulatory process and the WSIP statute incentivizes CWSNC to engage in timely maintenance and upkeep of its facilities. For example, under the Company's proposed WSIP rate adjustment, the Company is requesting reasonable estimates for routine maintenance investments, such as individual pump and motor replacements, main line breaks, electrical component failure, etc. Timely repair or replacement of this ancillary equipment is critical to provide quality service to our customers and adequate environmental protection, as well as supporting good customer service. The three-year WSIP provides the Commission with significant oversight. The Commission always has the ability to monitor the impacts of a WSIP on all stakeholders and to judge whether the utility continues to meet key goals and is earning a reasonable, but not excessive, return. Notably, the WSIP statute and rules contain important safeguards for customers, such as the 5% annual limit on rate increases, the earnings review process, and potential refunds resulting from the earnings review

process. Therefore, the Company continues to benefit, and is incentivized by, good stewardship and good management, including with regard to routine maintenance.

**Vince Roy, Carolina Trace, 237 Lakeview Drive, Sanford, North Carolina, N.C.**  
*Tr., pp. 30-41.*

Mr. Roy introduced himself as the water/sewer representative for the Carolina Trace community and has served in that capacity for 16 years. Mr. Roy, as a representative of Carolina Trace, characterized the “good relationship” he has with the CWSNC working staff, “all the way up into the headquarters in Charlotte. We get things done.” *Tr. p. 31, line 24 - p. 32, line 6.* By way of example, he recounted the camaraderie between CWSNC and its customers as shown by how CWSNC addressed recent line breaks in Carolina Trace. Mr. Roy testified that Carolina Trace receives good quality of service from CWSNC.

Mr. Roy objected to the extent of the requested rate increase. He stated the request for a 10.7 percent profit margin is a little high, especially for military families. He suggested that the military instead should receive a discount. Mr. Roy also contended the rationale of the rate increase was to reinstate a higher base rate. Mr. Roy described that certain neighbors are conservationists, and they take exception to the request to increase base rates after the Commission decreased them in the late rate case.

Finally, Mr. Roy complimented CWSNC on the improved methodology it uses before shutting the water off on customers.

Mr. Roy supplemented his oral testimony with a two-page written statement which was admitted into the record.

**CWSNC's Response to Customer Roy:**

CWSNC appreciates the testimony from Mr. Roy regarding the Company's good quality of service, collaborative efforts with its customers, and process for water disconnections.

With regard to Mr. Roy's objection to the rate increase, CWSNC has made or intends to make investment in the Carolina Trace service area. Since the last rate filing, CWSNC has completed a replacement of the Carolina Trace Wastewater Treatment Plant, which was damaged in Hurricane Florence. The Company also has implemented repairs to the wastewater collection system, as well as replaced gravity sewer main on the bridge. Through the WSIP period, CWSNC intends on making additional investments in Carolina Trace, including the replacement of meters with AMI meters and additional wastewater collection system work.

In response to Mr. Roy's testimony in opposition to the proposed rate increase, any base facilities charges modification is intended to reflect, as much as possible, the fixed costs of the facilities required to provide service. These are static amounts and do not disappear when residents are away. As a factual matter, CWSNC is not proposing a change to the fixed to volumetric ratios in this rate case. The current breakdown is 40% fixed, 60% volumetric. CWSNC's request is that to the extent that the rates are increased, they be in a similar ratio as previously approved. CWSNC has only had the new fixed to volumetric ratio for a short period of time and data is not available on changes in customer behavior. Generally, fixed

fees can be appropriate so that the system is be able to provide service on demand, whether or not the customer is there to exert a demand for usage.

CWSNC disputes Mr. Roy's assertion that it is seeking a 10.7% "profit margin." The Company would clarify that its requested 10.70% return on equity is not equivalent to a rate of return – the rate of return requested is 7.67%. A rate of return is the weighted average of all costs of capital used to fund the operations and infrastructure investments of a utility, and encompasses both debt and equity costs. The requested return on equity would provide a return to the investors of CWSNC on their share of investment in the utility. Additionally, please note that any return on equity established by the Commission is not a guaranteed return. The utility has an opportunity to earn the return authorized, but is incentivized to operate in an efficient, prudent, and reasonable manner to realize this opportunity.

#### **E. CONCLUSION**

CWSNC appreciates the willingness of its customers to participate in this process and the Company understands customers' opposition to rate increases. However, this is a capital-intensive industry and, since the last rate case, CWSNC has invested more than \$17,300,000 in new water and sewer plant in North Carolina. Therefore, if the new, additional capital investments made by CWSNC are proved to be necessary and prudent, the opportunity to recover those costs is required by law and in order for the Company to continue to provide adequate service. The public's assurance of fairness to customers is found in the strict, highly-skilled oversight and regulation by the Public Staff and the Commission.

Respectfully submitted, this the 24<sup>th</sup> day of October, 2022.

SANFORD LAW OFFICE, PLLC

**Electronically Submitted**

**/s/ Jo Anne Sanford**

State Bar No. 6831

Post Office Box 28085

Raleigh, North Carolina 27611

T: 919-210-4900

e-mail: sanford@sanfordlawoffice.com

**/s/ Kay Pashos, Pro Hac Vice**

Ice Miller LLP

One American Square, Ste. 2900

Indianapolis, Indiana 46282-0200

T: 317-236-2208

e-mail: kay.pashos@icemiller.com

**/s/ Mark Alson, Pro Hac Vice**

Ice Miller LLP

One American Square, Ste. 2900

Indianapolis, Indiana 46282-0200

T: 317-236-2263

e-mail: mark.alsen@icemiller.com

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

**VERIFICATION**


Matthew P. Schellinger II, being duly sworn, deposes and says that he is Regional Director of Financial Planning and Analysis for Carolina Water Service, Inc. of North Carolina; that he is familiar with the facts set out in this **REPORT ON CUSTOMER COMMENTS FROM PUBLIC HEARING HELD IN RALEIGH, NORTH CAROLINA ON OCTOBER 3, 2022**, filed in Docket No. W-354, Sub 400; that he has read the foregoing Report and knows the contents thereof; and that the same is true of his knowledge except as to those matters stated therein on information and belief, and as to those he believes them to be true.

Matthew Schellinger II  
Matthew P. Schellinger II

Sworn to and subscribed before me this  
the 24th day of October 2022.

Christopher Anderson  
Notary Public

My Commission Expires: 06/08/2031

 **Christopher Anderson**  
Notary Public for South Carolina  
Commission Expires: 06/08/2031

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 24<sup>th</sup> day of October, 2022, a copy of the foregoing **REPORT ON CUSTOMER COMMENTS FROM RALEIGH PUBLIC HEARING HELD ON OCTOBER 3, 2022**, filed by Carolina Water Service, Inc. of North Carolina in Docket No. W-354, Sub 400, has been duly served upon all parties of record by electronic service.

**Electronically Submitted**

**/s/Jo Anne Sanford**

Bar No. 6831

SANFORD LAW OFFICE, PLLC

Post Office Box 28085

Raleigh, North Carolina 27611-8085

Tel: (919) 210-4900

[sanford@sanfordlawoffice.com](mailto:sanford@sanfordlawoffice.com)