

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

October 3, 2018

Ms. M. Lynn Jarvis, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Via Electronic Filing

Re: Aqua North Carolina, Inc. - Application for General Rate Increase
Docket No. W-218, Sub 497
Response to Request for Late-Filed Exhibit from Commissioner
Daniel G. Clodfelter

Dear Ms. Jarvis:

During the evidentiary hearing in this matter, Commissioner Daniel G. Clodfelter made a request of Aqua North Carolina, Inc. (“Aqua” or “Company”) for a late-filed exhibit. The request, as set forth in the hearing transcript, is understood by Aqua to be as follows:

Commissioner Clodfelter:

I would like to ask too if the Company would be willing to submit a late-filed exhibit of any documentation that shows DEQ approval of the interconnection that Mr. Becker referred to in his cross examination by Mr. Grantmyre. Interconnection for the new capacity purchase of Johnston County. If there is documentation of that and it's not just an oral statement, if the Company would file as a late-filed exhibit, that documentation, I would appreciate it. (Tr. Vol. 15, p. 130, lines 23-24 through p.131, lines 1-10)

Aqua hereby files the following documents in response to Commissioner Clodfelter's request.

- “Neuse Colony Wastewater Hydraulic Capacity Response.pdf” -

This is Aqua's response (from Joe Pearce) to NCDEQ on May 30,

2018, stating that the Company will have the interconnection construction from Aqua's Neuse Colony WWTP to Johnston County's collection system completed by March 31, 2019.¹ This exhibit is marked as Aqua Johnston County Late-Filed Exhibit 1.

- **"Neuse Colony ATC Permit.pdf"** - This is the Authorization to Construct ("ATC") issued by the North Carolina Department of Environmental Quality ("NCDEQ") on September 5, 2018, for the new pumps, piping, control, and other modifications to the existing .35 MGD Neuse Colony WWTP. This ATC is an integral component of the project necessary to complete the interconnection of Aqua's system to Johnston County's collection system. This exhibit is marked as Aqua Johnston County Late-Filed Exhibit 2.
- **"WQ0040310 - Neuse Colony WWTP - Johnston County Sewer Extension - Aqua.pdf"** - This is the Permit issued by the Division of Water Resources of the NCDEQ on September 28, 2018, to Aqua for the interconnection of Aqua's Neuse Colony WWTP to Johnston County's Wastewater Collection System. This is the permit for the construction of Aqua's wastewater collection system extension. This exhibit is marked as Aqua Johnston County Late-filed Exhibit 3.

¹ Note on current timing: The project completion date of March 31, 2019, continues to be the Company's target, but is, of course, subject to unforeseen circumstances that may develop as the project progresses toward completion.

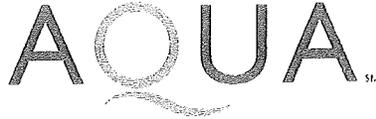
Aqua will be pleased to provide any additional information that the Commission may require from the Company in further response to Commissioner Clodfelter's initial request.

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
State Bar No. 6831
Attorney for Aqua North Carolina, Inc.

c: Parties of Record



May 30, 2018

Mr. Danny Smith, Regional Supervisor
Water Quality Regional Operations Section
NCDEQ-DWR
Water Quality Operations Section
1628 Mail Service Center
Raleigh, NC 27699-1628

Re: Wastewater Treatment Hydraulic Capacity at Neuse Colony WWTP
NPDES Permit No NC0064564
Johnston County

Dear Mr. Smith:

Aqua North Carolina, Inc. (Aqua) offers the following response to the above-referenced request for information which was issued on March 29, 2018.

Aqua's Response:

Aqua has an allocation contract with Johnston County (County) for up to 0.500 MGD of flow to the County for treatment. At this time, RKK (AQUA's engineering consultant) is designing a pump, forcemain, and meter station to convey flow to the County. It is estimated this additional 0.500 MGD capacity will be sufficient to serve this site for many years. Additionally, RKK is preparing a preliminary design and alternatives analysis for buildout of the site at 1.25 MGD (0.75 MGD Neuse Colony WWTP and 0.5 MGD County). Aqua and RKK are meeting with Johnston County Public Utilities on June 6th to finalize design requirements related to the interconnect. It is currently estimated that the engineering plan submittal for the pump station will be submitted to NCDEQ before August 15, 2018 and for the interconnect construction to be completed by March 31, 2019.

If you have any questions or comments, please do not hesitate to contact me at (919) 653-6964 or by cellphone at (919)605-6991.

Sincerely,


Joseph Pearce PE CFM
Director of Operations

cc: Shannon Becker, President
Michael Melton, Engineering Manager
Robert D. Krueger, Central Area Manager



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

LINDA CULPEPPER
Interim Director

September 5, 2018

Mr. Michael Melton
Engineering Manager
Aqua North Carolina
4163 Sinclair St
Denver, North Carolina 28037

SUBJECT: Authorization to Construct
A to C No. 064564A05
Aqua North Carolina, Inc.
Neuse Colony WWTP
NPDES Permit No. NC0064564

Dear Mr. Melton:

A letter of request for an Authorization to Construct was received September 4, 2018, by the Division of Water Resources (Division), and final plans and specifications for the subject project have been reviewed and found to be satisfactory. Authorization is hereby granted for the construction of modifications to the existing 0.35 MGD Neuse Colony WWTP, with discharge of treated wastewater into the Neuse River in the Neuse River Basin.

This authorization results in no increase in design or permitted capacity and is awarded for the construction of the following specific modifications:

Installation of two (2) new 575 GPM wet-pit submersible pumps with VFDs, piping and control; Installation of one (1) new 125 KW emergency generator; Modification of existing equalization tank; in conformity with the project plans, specifications, and other supporting documentation comprising the ATC Permit Application package submitted to the Department of Environmental Quality.

In addition to the appropriate construction items approved in this Authorization to Construct, the following work scope items stated in the application were deemed as maintenance events and require no approval:

- Miscellaneous building improvements and associated sitework and electrical work

This ATC is issued in accordance with Part III, Paragraph A of NPDES Permit No. NC0064564 issued effective September 1, 2018, and shall be subject to revocation unless the



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wastewater treatment facilities are constructed in accordance with the conditions and limitations specified in Permit No. NC0064564.

It is the Owner's responsibility to ensure that the as-constructed project meets the requirements of all applicable regulations and statutes, the ATC Permit Application package, and all of the requirements contained herein. Failure to comply may result in penalties in accordance with North Carolina General Statute §143-215.6A through §143-215.6C.

The sludge generated from these treatment facilities must be disposed of in accordance with G.S. 143-215.1 and in a manner approved by the Division.

In the event that the facilities fail to perform satisfactorily, including the creation of nuisance conditions, the Permittee shall take immediate corrective action, including those as may be required by the Division, such as the construction of additional or replacement wastewater treatment or disposal facilities.

The Raleigh Regional Office, telephone number 919-791-4200, shall be notified at least forty-eight (48) hours in advance of operation of the installed facilities so that an on site inspection can be made. Such notification to the regional supervisor shall be made during the normal office hours from 8:00 a.m. until 5:00 p.m. on Monday through Friday, excluding State Holidays.

Upon completion of construction and prior to operation of this permitted facility, a certification must be received from a Professional Engineer certifying that the permitted facility has been installed in accordance with the NPDES Permit and the ATC Permit Application package. Mail the Certification to: Division of Water Resources, WQ Permitting – NPDES, 1617 Mail Service Center, Raleigh, NC 27699-1617.

Upon classification of the facility by the Certification Commission, the Permittee shall employ a certified wastewater treatment plant operator to be in responsible charge (ORC) of the wastewater treatment facilities. The operator must hold a certificate of the type and grade at least equivalent to or greater than the classification assigned to the wastewater treatment facilities by the Certification Commission.

The Permittee must also employ a certified back-up operator of the appropriate type and grade to comply with the conditions of T15A:8G.0202. The ORC of the facility must visit each Class I facility at least weekly and each Class II, III and IV facility at least daily, excluding weekends and holidays, must properly manage the facility, must document daily operation and maintenance of the facility, and must comply with all other conditions of T15A:8G.0202.

A copy of the project plans and specifications shall be maintained on file by the Permittee for the life of the facility.

During the construction of the proposed additions/modifications, the Permittee shall continue to properly maintain and operate the existing wastewater treatment facilities at all times,



Mr. Michael Melton, engineering Manager
September 5, 2018
Page 3 of 3

and in such a manner, as necessary to comply with the effluent limits specified in the NPDES Permit.

You are reminded that it is mandatory for the project to be constructed in accordance with the North Carolina Sedimentation Pollution Control Act, and when applicable, the North Carolina Dam Safety Act. In addition, the specifications must clearly state what the contractor's responsibilities shall be in complying with these Acts.

Prior to entering into any contract(s) for construction, the recipient must have obtained all applicable permits from the State.

The issuance of this ATC does not preclude the Permittee from complying with any and all statutes, rules, regulations, or ordinances which may be imposed by other government agencies (local, state, and federal) which have jurisdiction.

If you have any questions or need additional information, please contact Bing Bai at telephone number (919) 707-3610.

Sincerely,


for Linda Culpepper
Interim Director, Division of Water Resources

With Engineer's Certificate attached:

cc: DWR Raleigh Regional Office, Water Quality Programs
Central Files

ecopy: Kevin Nash, P.E.
RK&K
Email: knash@rkk.com
NPDES File

Without Engineer's Certificate attached:

cc: Johnston County Health



Aqua North Carolina, Inc.
Neuse Colony WWTP
NPDES No. NC0064564
Authorization to Construct No. 064564A05
Issued September 5, 2018

Engineer's Certification

I, _____, as a duly registered Professional Engineer in the State of North Carolina, having been authorized to observe (periodically/weekly/full time) the construction of the modifications and improvements to the Neuse Colony WWTP, located in Johnston County, hereby state that, to the best of my abilities, due care and diligence was used in the observation of the following construction:

Installation of two (2) new 575 GPM wet-pit submersible pumps with VFDs, piping and control; Installation of one (1) new 125 KW emergency generator; Modification of existing equalization tank; in conformity with the project plans, specifications, and other supporting documentation comprising the ATC Permit Application package submitted to the Department of Environmental Quality.

I certify that the construction of the above referenced project was observed to be built within substantial compliance, intent and in conformity with all applicable regulations and statutes and the project plans, specifications, and other supporting documentation comprising the Authorization to Construct Permit Application package.

Signature _____ Registration No. _____

Date _____

Mail this Certification to: Attn: Bing Bai
 Complex Permitting Unit
 DEQ/DWR/Water Quality Programs
 1617 Mail Service Center
 Raleigh, NC 27699-1617

SEAL



September 28, 2018

Michael Melton, Engineering Manager
Aqua North Carolina, Inc.
4163 Sinclair Street
Denver, NC 28037

Subject: Permit No. WQ0040310
Aqua North Carolina, Inc.
Neuse Colony WWTP – Johnston County Sewer Interconnect
Wastewater Collection System Extension Permit
Johnston County

Dear Mr. Melton:

In accordance with your application received September 4, 2018, and additional information received on September 11, 2018, we are forwarding herewith Permit No. WQ0040310 dated September 28, 2018, to Aqua North Carolina, Inc. (Permittee) for the construction and operation upon certification of the subject wastewater collection system extension. This permit shall be effective from the date of issuance until rescinded and shall be subject to the conditions and limitations as specified therein. This cover letter shall be considered a part of this permit and is therefore incorporated therein by reference.

Please pay particular attention to the following conditions contained within this permit:

- Condition I.1: This permit shall become voidable unless the agreement between Aqua North Carolina, Inc. and Johnston County for the collection and final treatment of wastewater is in full force and effect.
- Condition II.1: This permit shall not be automatically transferable; a permit modification request for a name change must first be approved by this office.
- Condition II.4: Requires that the wastewater collection facilities be properly operated and maintained in accordance with 15A NCAC 2T .0403 or any individual system-wide collection system permit issued to the Permittee.

It shall be the responsibility of the Permittee to ensure that the as-constructed project meets the appropriate design criteria and rules. Failure to comply may result in penalties in accordance with North Carolina General Statute §143-215.6A through §143-215.6C, construction of additional or replacement wastewater collection facilities, and/or referral of the North Carolina-licensed Professional Engineer to the licensing board.

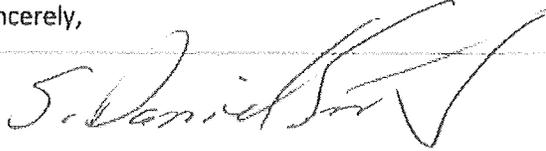
If any parts, requirements, or limitations contained in this permit are unacceptable, you have the right to request an adjudicatory hearing upon written request within 30 days following receipt of this permit. This request must be in the form of a written petition, conforming to Chapter 150B of North Carolina General

Aqua North Carolina, Inc.
Permit No. WQ0040310

Statutes, and filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714. Unless such demands are made, this permit shall be final and binding.

If you need additional information concerning this matter, please contact Ted Cashion at (919) 791-4254 or via e-mail at ted.cashion@ncdenr.gov.

Sincerely,



for Linda Culpepper
Interim Director, Division of Water Resources

by S. Daniel Smith, Regional Supervisor
Water Quality Regional Operations Section
Raleigh Regional Office
Division of Water Resources, NCDEQ

cc: Kevin Nash, P.E., RK&K, (via email: knash@rkk.com)
Chandra Farmer, Johnston Co. Public Utilities Director (via email: chandra.farmer@johnstonnc.com)
Johnston County Health Department
Raleigh Regional Office Files
Water Resources Central Files

North Carolina Department of Environmental Quality

STATE OF NORTH CAROLINA
ENVIRONMENTAL MANAGEMENT COMMISSION
DEPARTMENT OF ENVIRONMENTAL QUALITY

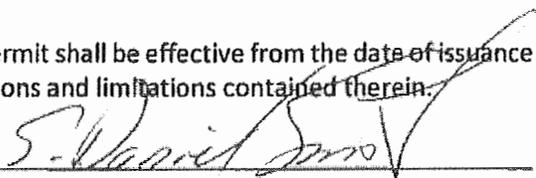
WASTEWATER COLLECTION SYSTEM EXTENSION PERMIT

In accordance with the provisions of Article 21 of Chapter 143, General Statutes of North Carolina as amended, and other applicable Laws, Rules, and Regulations, permission is hereby granted to

Aqua North Carolina, Inc.
Johnston County

for the construction and operation of approximately 600 linear feet of 8-inch force main to serve existing and future development as part of the Neuse Colony WWTP – Johnston County Sewer Interconnect project, and the discharge of no additional gallons of collected wastewater into Aqua North Carolina, Inc.'s and Johnston County's existing sewerage system, pursuant to the application received September 4, 2018, and additional information received on September 11, 2018 and in conformity with 15A NCAC 2T; the Division's Gravity Sewer Minimum Design Criteria adopted February 12, 1996 and updated in March 2008, as applicable; the Division's Minimum Design Criteria for the Fast-Track Permitting of Pump Stations and Force Mains adopted June 1, 2000 and updated March 2008, as applicable; and other supporting data subsequently filed and approved by the Department of Environmental Quality and considered a part of this permit.

This permit shall be effective from the date of issuance until rescinded and shall be subject to the specified conditions and limitations contained therein.



Linda Culpepper
Interim Director, Division of Water Resources
By Authority of The Environmental Management Commission

Permit Number: WQ0040310
Permit Issued: September 28, 2018

SUPPLEMENT TO PERMIT COVER SHEET

Aqua North Carolina, Inc. is hereby authorized to:

Construct, and then operate upon certification the aforementioned wastewater collection extension. The sewage and wastewater collected by this system shall be treated in the Central Johnston County Regional Wastewater Treatment Facility in accordance with Permit Number NC0030716.

Permitting of this project does not constitute an acceptance of any part of the project that does not meet 15A NCAC 2T; the Division's Gravity Sewer Minimum Design Criteria adopted February 12, 1996 and updated March 2008, as applicable; and the Division's Minimum Design Criteria for the Fast-Track Permitting of Pump Stations and Force Mains adopted June 1, 2000 and updated March 2008, as applicable, unless specifically mentioned herein. Division approval is based on acceptance of the certification provided by a North Carolina-licensed Professional Engineer in the application. It shall be the Permittee's responsibility to ensure that the as-constructed project meets the appropriate design criteria and rules.

Construction and operation is contingent upon compliance with the Standard Conditions and any Special Conditions identified below.

I. SPECIAL CONDITIONS

1. This permit shall become voidable unless the agreement between Aqua North Carolina, Inc. and Johnston County for the collection and final treatment of wastewater is in full force and effect. [15A NCAC 02T.0304(h)]

II. STANDARD CONDITIONS

1. This permit shall not be transferable. In the event there is a desire for the wastewater collection facilities to change ownership, or there is a name change of the Permittee, a formal permit request shall be submitted to the Division accompanied by documentation from the parties involved, and other supporting materials as may be appropriate. The approval of this request shall be considered on its merits and may or may not be approved. [15A NCAC 02T.0104; G.S 143-215.1(d3)]
2. This permit shall become voidable unless the wastewater collection facilities are constructed in accordance with the conditions of this permit; 15A NCAC 2T; the Division's Gravity Sewer Minimum Design Criteria adopted February 12, 1996 and updated March 2008, as applicable; the Division's Minimum Design Criteria for the Fast-Track Permitting of Pump Stations and Force Mains adopted June 1, 2000 and updated March 2008, as applicable; and other supporting materials unless specifically mentioned herein. [15A NCAC 02T.0110]
3. This permit shall be effective only with respect to the nature and volume of wastes described in the application and other supporting data. [15A NCAC 02T .0110]
4. The wastewater collection facilities shall be properly maintained and operated at all times. The Permittee shall maintain compliance with an individual system-wide collection system permit for the operation and maintenance of these facilities as required by 15A NCAC 2T .0403. If an individual permit is not required, the following performance criteria shall be met: [15A NCAC 02T .0108(b)]:

- a. The sewer system shall be effectively maintained and operated at all times to prevent discharge to land or surface waters, and to prevent any contravention of groundwater standards or surface water standards.
 - b. A map of the sewer system shall be developed and shall be actively maintained.
 - c. An operation and maintenance plan including pump station inspection frequency, preventative maintenance schedule, spare parts inventory and overflow response has been developed and implemented.
 - d. Pump stations that are not connected to a telemetry system shall be inspected every day (i.e. 365 days per year). Pump stations that are connected to a telemetry system shall be inspected at least once per week.
 - e. High-priority sewer lines shall be inspected at least once per every six-months and inspections are documented.
 - f. A general observation of the entire sewer system shall be conducted at least once per year.
 - g. Overflows and bypasses shall be reported to the appropriate Division regional office in accordance with 15A NCAC 2B .0506(a), and public notice shall be provided as required by North Carolina General Statute §143-215.1C.
 - h. A Grease Control Program is in place as follows:
 1. For public owned collection systems, the Grease Control Program shall include at least biannual distribution of educational materials for both commercial and residential users and the legal means to require grease interceptors at existing establishments. The plan shall also include legal means for inspections of the grease interceptors, enforcement for violators and the legal means to control grease entering the system from other public and private satellite sewer systems.
 2. For privately owned collection systems, the Grease Control Program shall include at least bi-annual distribution of grease education materials to users of the collection system by the permittee or its representative.
 3. Grease education materials shall be distributed more often than required in Parts (1) and (2) of this Subparagraph if necessary to prevent grease-related sanitary sewer overflows.
 - i. Right-of-ways and easements shall be maintained in the full easement width for personnel and equipment accessibility.
 - j. Documentation shall be kept for Subparagraphs (a) through (i) of this Rule for a minimum of three years with exception of the map, which shall be maintained for the life of the system.
5. The Permittee shall report by telephone to a water resources staff member at the Raleigh Regional Office, telephone number (919) 791-4200, as soon as possible, but in no case more than 24 hours, following the occurrence or first knowledge of the occurrence of either of the following:

- a. Any process unit failure, due to known or unknown reasons, that renders the facility incapable of adequate wastewater transport, such as mechanical or electrical failures of pumps, line blockage or breakage, etc.; or
- b. Any SSO and/or spill over 1,000 gallons; or
- c. Any SSO and/or spill, regardless of volume, that reaches surface water

Voice mail messages or faxed information is permissible, but this shall not be considered as the initial verbal report. Overflows and spills occurring outside normal business hours may also be reported to the Division of Emergency Management at telephone number (800) 858-0368 or (919) 733-3300. Persons reporting any of the above occurrences shall file a spill report by completing and submitting Part I of Form CS-SSO (or the most current Division approved form) within five days following first knowledge of the occurrence. This report must outline the actions taken or proposed to be taken to ensure that the problem does not recur. Part II of Form CS-SSO (or the most current Division approved form) can also be completed to show that the SSO was beyond control. [G.S. 143-215.1C(a1)]

6. Construction of the gravity sewers, pump stations, and force mains shall be scheduled so as not to interrupt service by the existing utilities nor result in an overflow or bypass discharge of wastewater to the surface waters of the State. [15A NCAC 02T.0108(b)]
7. Upon completion of construction and prior to operation of these permitted facilities, the completed Engineering Certification form attached to this permit shall be submitted with the required supporting documents to the address provided on the form. A complete certification is one where the form is fully executed and the supporting documents are provided as applicable. Any wastewater flow made tributary to the wastewater collection system extension prior to completion of this Engineer's Certification shall be considered a violation of the permit and shall subject the Permittee to appropriate enforcement actions.

If the permit is issued to a private entity with an Operational Agreement, then a copy of the Articles of Incorporation, Declarations/Covenants/Restrictions, and Bylaws that have been appropriately filed with the applicable County's Register of Deeds office shall be submitted with the certification.

A complete certification is one where the form is fully executed and the supporting documents are provided as applicable. Supporting documentation shall include the following:

- a. One copy of the project construction record drawings (plan & profile views of sewer lines & force mains) of the wastewater collection system extension. Final record drawings should be clear on the plans or on digital media (CD or DVD disk) and are defined as the design drawings that are marked up or annotated with after construction information and show required buffers, separation distances, material changes, etc.
- b. One copy of the supporting applicable design calculations including pipe and pump sizing, velocity, pump cycle times, and level control settings, pump station buoyancy, wet well storage, surge protection, detention time in the wet well, and force main, ability to flush low points in force mains with a pump cycle, and downstream sewer capacity analysis. If a portable power source or pump is dedicated to multiple stations, an evaluation of all the pump stations' storage capacities and the rotation schedule of the portable power source or pump, including travel timeframes, shall be provided.

- c. Changes to the project that do not result in non-compliance with this permit, regulations, or the Minimum Design Criteria should be clearly identified on the record drawings, on the certification in the space provided, or in written summary form.

Prior to Certification (Final or Partial): Permit modifications are required for any changes resulting in non-compliance with this permit (including pipe length increases of 10% or greater, increased flow, pump station design capacity design increases of 5% or greater, and increases in the number/type of connections), regulations, or the Minimum Design Criteria. Requested modifications or variances to the Minimum Design Criteria will be reviewed on a case-by-case basis and each on its own merit. Please note that variances to the Minimum Design Criteria should be requested and approved during the permitting process prior to construction. After-construction requests are discouraged by the Division and may not be approved, thus requiring replacement or repair prior to certification & activation. [15A NCAC 02T .0116]

8. Gravity sewers installed greater than ten percent below the minimum required slope per the Division's Gravity Sewer Minimum Design Criteria shall not be acceptable and shall not be certified until corrected. If there is an unforeseen obstacle in the field where all viable solutions have been examined, a slope variance can be requested from the Division with firm supporting documentation. This shall be done through a permit modification with fee. Such variance requests will be evaluated on a case-by-case basis. Resolution of such request shall be evident prior to completing and submitting the construction certification. [15A NCAC 02T.0105(n)]
9. A copy of the construction record drawings shall be maintained on file by the Permittee for the life of the wastewater collection facilities. [15A NCAC 02T .0116]
10. Failure to abide by the conditions and limitations contained in this permit; 15A NCAC 2T; the Division's Gravity Sewer Design Criteria adopted February 12, 1996 and updated March 2008, as applicable; the Division's Minimum Design Criteria for the Fast-Track Permitting of Pump Station and Force Mains adopted June 1, 2000 and updated March 2008 as applicable; and other supporting materials may subject the Permittee to an enforcement action by the Division, in accordance with North Carolina General Statutes §143-215.6A through §143-215.6C, construction of additional or replacement wastewater collection facilities, and/or referral of the North Carolina-licensed Professional Engineer to the licensing board. [15A NCAC 02T .0104; 15A NCAC 02T .0108(b-c)]
11. In the event that the wastewater collection facilities fail to perform satisfactorily, including the creation of nuisance conditions, the Permittee shall take immediate corrective action, including those as may be required by this Division, such as the construction of additional or replacement facilities. [15A NCAC 02T .0110; 15A NCAC 02T .0108(b)]
12. The issuance of this permit shall not exempt the Permittee from complying with any and all statutes, rules, regulations, or ordinances that may be imposed by the Division any other Federal, State, or Local government agencies which have jurisdiction or obtaining other permits which may be required by the Division or any other Federal, State, of Local government agencies. [G.S. 143-215.1(b)]

VERIFICATION

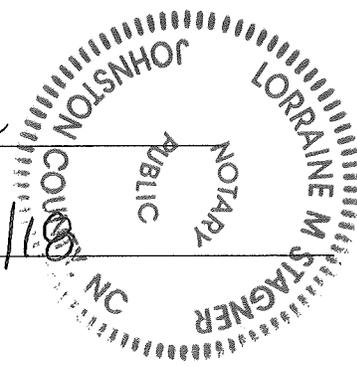
Michael Melton, being duly sworn, deposes and says: that he is the Engineering Manager for Aqua North Carolina, Inc. ("Aqua"); that he is familiar with the facts set out in Aqua's attached **Response to Request for Late-Filed Exhibit from Commissioner Daniel G. Clodfelter** filed in Docket No. W-218, Sun 497; that he has read the foregoing Response 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.

Michael Melton
Michael Melton

Sworn to and subscribed before me this
the 3rd day of October 2018.

Lorraine M. Stagner
Notary Public

My Commission Expires: 12/06/18



CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the **Response to Request for Late-Filed Exhibit from Commissioner Daniel G. Clodfelter**, filed by Aqua North Carolina, Inc. in Docket No. W-218, Sub 497, on the parties of record in accordance with North Carolina Utilities Commission Rule R1-39, either by United States mail, first class postage pre-paid; by hand delivery; or by means of electronic delivery upon agreement of the receiving party.

This the 3rd day of October 2018.

Electronically Submitted
/s/Jo Anne Sanford
North Carolina State Bar No. 6831

SANFORD LAW OFFICE, PLLC
sanford@sanfordlawoffice.com
Tel: 919.210.4900
Attorney for Aqua North Carolina, Inc.