

NORTH CAROLINA PUBLIC STAFF UTILITIES COMMISSION

March 2, 2022

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

Re: Docket No. W-1333, Sub 0 and W-1130, Sub 11 - Application of Currituck Water and Sewer, LLC for Authority to Transfer the Sandler Utilities at Mill Run, LLC Wastewater System and Public Utility Franchise in Currituck County, North Carolina and for Approval of Rates

Dear Ms. Dunston:

In connection with the above-captioned docket, I transmit herewith for filing on behalf of the Public Staff the Direct Testimony and Exhibit of Iris Morgan.

By copy of this letter, we are forwarding copies to all parties of record.

Sincerely,

/s/ Gina C. Holt Staff Attorney gina.holt@psncuc.nc.gov

GCH Attachments

> **Executive Director** Communications Economic Research Legal Transportation (919) 733-6110 (919) 733-7766 (919) 733-2435 (919) 733-2810 (919) 733-2902 Accounting **Consumer Services** Electric **Natural Gas** Water (919) 733-5610 (919) 733-4279 (919) 733-9277 (919) 733-2267 (919) 733-4326

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-1333, SUB 0

DOCKET NO. W-1130, SUB 11

In the Matter of
Application by Currituck Water and)
Sewer, LLC, 4700 Homewood Court,)
Suite 108, Raleigh, North Carolina)
27609, and Sandler Utilities at Mill Run,)
LLC, 448 Viking Drive, Suite 220,)
Virginia Beach, Virginia 23452, for)
Authority to Transfer the Sandler)
Utilities at Mill Run Wastewater System)
and Public Utility Franchise in Currituck)
County, North Carolina, and for)
Approval of Rates.

TESTIMONY OF
IRIS MORGAN
PUBLIC STAFF- NORTH
CAROLINA UTILITIES
COMMISSION

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION CURRITUCK WATER AND SEWER, LLC DOCKET NO. W-1333, SUB 0

SANDLER UTILITIES AT MILL RUN, LLC DOCKET NO. W-1130, SUB 11

TESTIMONY OF IRIS MORGAN ON BEHALF OF THE PUBLIC STAFF NORTH CAROLINA UTILITIES COMMISSION

MARCH 2, 2022

1	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND
2		PRESENT POSITION.
3	A.	My name is Iris Morgan and my business address is 430 North
4		Salisbury Street, Raleigh, North Carolina. I am a Financial Analyst in
5		the Water Section of the Public Staff - Accounting Division
6		(Accounting Division) and represent the using and consuming public
7		in this proceeding.
8	Q.	HOW LONG HAVE YOU BEEN EMPLOYED BY THE PUBLIC
9		STAFF?
10	A.	I have been employed by the Public Staff - North Carolina Utilities
11		Commission (Public Staff) since September 2, 2002. I joined the
12		Accounting Division on December 1, 2008.
13	Q.	BRIEFLY STATE YOUR QUALIFICATIONS AND DUTIES.

1 Q. WHAT ARE YOUR DUTIES IN YOUR PRESENT POSITION?

A. I am responsible for analyzing testimony, exhibits, and other data parties present before the North Carolina Utilities Commission (Commission). I am also responsible for performing examinations of the books and records of utilities involved in proceedings before the Commission and summarizing the results in testimony and exhibits for the Commission.

8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS

9 **PROCEEDING?**

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The purpose of my testimony is to (1) present the results of my investigation of the level of investment (rate base) Currituck Water and Sewer, LLC (Currituck) filed in its request to acquire the Eagle Creek Subdivision sewer system and franchise in Currituck County, North Carolina from Sandler Utilities at Mill Run, LLC (Sandler) (sometimes referred to collectively as the Applicants) and its request for Commission approval of its proposed rates (the Joint Application); and (2) recommend an original cost net investment that Currituck could recover from prospective customers if the Commission approved the transfer of the system and franchise.

20 Q. PLEASE DESCRIBE THE SCOPE OF YOUR INVESTIGATION.

21 A. On May 19, 2021, the Applicants filed the Joint Application, which 22 seeks authority from the Commission to transfer Eagle Creek Subdivision sewer system and franchise in Currituck County, North
Carolina, to Currituck and approve rates for sewer operations. My
investigation included a review of the data Applicants filed, prior case
proceedings, and the Applicants' responses to Public Staff data
requests.

6 Q. WHAT EXHIBITS HAVE YOU PREPARED?

7 A. I have prepared one exhibit that includes several schedules with my
8 rate base adjustment calculations. Schedule 1 of my exhibit presents
9 the original cost rate base. Schedules 1-1(a) and 1-1(b) present the
10 Public Staff's calculations of utility plant in service, accumulated
11 depreciation, and contributions in aid of construction (CIAC).

12 Q. WHAT IS THE PUBLIC STAFF'S RECOMMENDED ORIGINAL

COST NET INVESTMENT?

13

- A. As shown on Schedule 1, the Public Staff has calculated a net plant in service amount of \$398,499 as of December 31, 2021, including updates through January 31, 2022, for this proceeding. The Company presented an amount of \$2,752,573 for plant in service in the Joint Application. Based on my investigation, I calculated a different amount for plant in service.
- First, I started with the plant in service amount of \$2,206,202, from the Company's last general rate case proceeding in Docket No. W-

1130, Sub 8. I added \$484,389 of additional plant items to this amount, in alignment with Public Staff Utilities Engineer D. Michael Franklin's recommendation. These adjustments result in a total plant in service amount of \$2,690,591, as shown on Schedule 1 of **Morgan Exhibit I**.

Next, I calculated accumulated depreciation and depreciation expense to reflect depreciation related to the adjusted plant in service shown on Schedules 1-1(a) and 1-1(b). I depreciated the property using the service lives Public Staff witness Franklin recommended. Finally, I calculated accumulated depreciation based on the length of time each plant item has been in service, using the half-year convention in the first year of an item's depreciable life, excluding additions made during the test year. These calculations resulted in a total amount of \$354,493 for accumulated depreciation and \$58,885 for depreciation expense, as shown on Schedule 1 and Schedule 1-1(b) of Morgan Exhibit I.

17 Q. PLEASE EXPLAIN HOW YOU DETERMINED THE PURCHASE

PRICE.

A. The asset purchase agreement between Currituck and Sandler (the APA) provides that the purchase price for the Eagle Creek wastewater utility system is \$250,000. In addition, the purchase price shall be increased by the amount of any costs incurred and paid by

Sandler(Seller) for renewel and replacements, capitalized repairs,
and/or upgrades to the Wastwater System as approved by the
Commision and Currituck (Buyer). The APA also provides for an
additional purchase price of \$88,900, equivalent to \$100 for each of
the 889 new connections made to the Eagle Creek wastewater utility
system from the adjacent Fost and Flora subdivisions that other
developers plan to build (Fost and Flora Additions). At this time,
these new connections have not been made and the Public Staff
would oppose the Fost and Flora Additions as the underlying
connections do not directly benefit Eagle Creek wastewater utility
system customers. For the reasons set forth in Public Staff witness
Franklin's testimony and at this time, the Public Staff is of the opinion
that a purchase price of no greater than the original cost net
investment is reasonable for ratemaking purposes, which is
\$398,499. Excluding the Fost and Flora additions, which the Public
Staff opposes, Currituck would only be entitled to recover the original
cost net investment at closing, as closing is defined in the APA.
Furthermore, the original cost net investment of \$398,499 is subject
to change based on the inclusion of reasonable and prudent plant
additions between December 31, 2021 and closing, and net of plant
retirements and additional accumulated depreciation and
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amortization through the date of closing.

- 1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- 2 A. Yes, it does.

QUALIFICATIONS AND EXPERIENCE

IRIS MORGAN

I graduated from North Carolina Wesleyan College with a Bachelor of Science Degree in Accounting and Business Administration in 2007. In addition, I graduated from the Keller Graduate School of Management with a Master of Accounting and Financial Management (2011), a Master of Business Administration (2013), and a Master of Public Administration (2014).

Prior to joining the Public Staff, I was employed by WorldCom, Inc., as a CORE Analyst. My duties included providing customer service support and addressing customer billing and reporting requirements.

I joined the Public Staff in September 2002 as an Administrative Assistant. In 2006, I was promoted to the position of Consumer Services Complaint Analyst, where I resolved numerous consumer complaints and performed utility reporting analysis. After completion of my accounting degree, I was promoted to the position of Public Staff Accountant in December 2008.

I have performed audits and filed testimony and exhibits in several water rate cases, and assisted in investigations addressing a wide range of topics and issues related to the water, electric, and gas industries.

Public Staff Morgan Exhibit 1 Page 1 of 5

	INDEX TO MORGAN EXHIBIT I														
Line No	<u>Title</u>	Schedule Number													
1	ORIGINAL COST RATE BASE	1													
2 3	CALCULATION OF PLANT IN SERVICE, ACCUMULATED DEPRECIATION AND DEPRECIATION EXPENSE	1-1(a) 1-1(b)													

Public Staff Morgan Exhibit 1 Page 2 of 5

Morgan Exhibit I

Schedule 1

Currituck Water and Sewer, LLC

Docket No. W-1333, Sub 0 ORIGINAL COST RATE BASE

For Test Year Ended December 31, 2021

Line No.	<u>ltem</u>	Amount Approved Per W-1130, Sub 8 (a)	Public Staff Adjustments [1] (b)	Amount Per Public Staff (c)	
1.	Plant in service	\$2,206,202	\$484,389	\$2,690,591 [2]	\$2,690,591
2.	Accumulated depreciation	(177,266)	(177,227)	(354,493) [3]	(\$354,493)
3.	Contributions in aid of construction	(1,937,599)	0	<u>(1,937,599)</u> [4]	(1,937,599)
4.	Net plant in service	\$91,337	\$307,162	\$398,499	\$398,499

[4]

Column (c) - Column (a). [1] Morgan Exhibit I, Schedule 1-1(a), Line 111, Column (a) + [2] Morgan Exhibit I, Schedule 1-1(b), Line 41, Column (a) Morgan Exhibit I, Schedule 1-1(a), Line 111, Column (f) + Morgan [3] Exhibit I, Schedule 1-1(b), Line 41, Column (f) Morgan Exhibit I, Schedule 1-1, Line 43, Column (a).

Public Staff Morgan Erhibit I	Page 3 of 5	Accumulated Despeciation [5]	\$13,000	10,687	674	1,969	13,458	3,000	680 393	468	096	508	793	720	1,065	700,1	1,813	2,380	1,323	2,432	731	2,480 1,923	428 540	120	120 120	600 120	4,911	10,622	2,389 9,816	4,201	614	7,999	470	802	4,190 488,6	/,500 439	2,700	1,303	1,77.0	2,910
	Schedule 1-1(a)	Annual Depredation (4)	,				9	00	00	96	> •	0	,			66		00		6 0	٥	00	00			99	0.0	, 0	00	00	30	00	00	0	90	o o	ac		90	
		Years in Service [3]	17.5	16.5 2.81	16.5 5.6	1 to 1	2,00 20,00 2	15.5 15.5	2. 2. 2. 2.	\$5. \$0.	5 75 5 75		15.5	14.5	14.5 6.5	7. 7. R. A. Z.	5.55 5.55	13.6 6.61	13.5	<u>6</u> 6 6	13.5	13.5 13.5	13.5	13.5	13.5 13.5	19.05 19.05 19.05	125	12.5	12.5 12.5	5 u	11.5	11.5	4. 1.	1.5	3.15 3.15	1.5 6.2.	805	10.5	45 45 45	10.5 10.5
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		Year Placed In Service (b)	2004	2002 2003 2003	2002	2005	2008 2008	2006	2008	2008	2006	2008	2006	2002	2007	2007	2008	2008	2008	2008 2008	2008	2008 2008	2008	2008	2008 2008	2008	5002	2009	2009	2010	2010	2010 2010	2010	2010	2010 2010	2010	201	201	201	2011 2011
		Plant fin Service Per Public Staff	۰.	0,500 (1) 687 (1) 890 C		E 201			680		[1] 0/8'L [1] 096	5,746 [1]	E 682	[t] 927 [t] 120 [t]	1,065 [1]	100,1	1,813 [1]	2,380 [1]	1.323	2,432 [1]		2,490 [1] 1,923 [1]	E 824		\$ \$ E E	600 5		1,937,599 [6]			3,138 (1) 614 (1)				3,584 [1]		2,700 [1]		3.40 E3 82.1	1,610 [1] 2,910 [1]
Curituck Water and Sewer, LLC Doctor No W-1333 Sub 0	CALCULATION OF PLANT IN SERVICE, ACCUMULATED DEPRECIATION AND DEPRECIATION EXPENSE For Text Year Ended December 31, 2021		Amount's in W-1130, Bub B rate case propording: Installaton: EQ pumps & Bar screen	Replacement: 2 ha surge pump Replacement: Busch 0630 vacuum pump	Noiso reduction at plant Rewind Myers pump	Rebuild 50 hp mater Repair: blower motor	Replacement telay, pressure switch fill cap Redisement vacuum pump	registroninster stores promise Regalt collapsed pil (abort) Redatement store outnot a total flahor)	Representative and parties provided to the second s	77 valve pit ficat hose & disphram	Replacement: valves, controller and surge compressor Replacement: controllers	Controllet/Sensor	Controller/Valve	Pump tanks repair Motor removal & repair	Mator repair	Motor repair	Nator repair 8" Militen valve	Repair collapsed pit (102 Eagleton)	Pump Valve replacement	Replacement; collapsed ptt (St. Andrews)	Painting at wastewater treatment plant Purt o	Repair collapsed pit (Greenview) Installation: rebuilt bit (Greenview)	Motor	Install 8 controller rebuild kits Replacement controller valve	Replacement controller valve Bedassement scottoller valva & surrea	Replacement, 7 controllers & 5 valves	reparement, controlled Replacement, pit and troubleshoot pit at Eagleton	Fully contributed plant from W-1130, Sub 2 rate case proceeding Rainbird etratus II infocution computer	Replace pt 266 Greenview Road	Replace pit 252/254 Greeview Road	Replace pit 197/199 Greenview Road Replace clarifier arm	Replace blower motor Consultant fees on sensional on of Nam	Replacement transformer on EQ panel	Replace EQ panel Replace vacuum canister	Replace skimmer meter Replace pit 266 Greenview Road	Pond tepal/ Beckerart num filter	150 signs	Electric blower motor . Ropkace sciencid valve	Rainbird rain watch system Bridgo filter	Replace EQ panel Huritane frene repaire
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Public Staff Morgan Exhibit (Page 4 of 5

Annual Depredation [4] (e)

Year Placed In Service	(p)	2011	2011	201	201	2012	2012	2012	2012	2012	2012	2012	2012	2012	2012	2012	2013	2013	2013	2013	2013	2013	2013	200	Ę	150	2013	2013	2013	2013	2013	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014	2014	2015		
Service Per Public Staff	(a)	[1] 528'2	613 [1]	2,685 [1]	4,567 [1]	627 [1]	420 [1]	14] 656	11] 828	1,140 [1]	(1) 996	293 [1]	B42 [1]	1,630 [1]	3,230 [1]	[1] 629 [1]	1,831 [2]		3,201 [2]	[2] [3]	_		-									_	830 [2]	_		1,407 [2]	2,634 [2]	2,148 [2]	1,170 [2]	6,547 [2]	1,481 [2]	882 [2]	Z 221	944 [2]	4,960 [2]	10,805 [2]	2000	34,644,642
. mail		Repair pit 220 Greenview Road	Replace mud well pump	Replace auto daler	Airvac pumps and valves	Replace beaker blower #2	Repair blower motar	Replace mud well pump	Replace mud well pump	Repair pit 153 Eagleton	Repair UV system	Replacing bearing one blower #1	Repair Nower control	Gravel driveway	Controller rebuild	Pump	Replace Pit 282 GVR	Rebuild starter	Replace tich pump motor	Replace rebusualt EQ Pump	Repair feat in Baln warmen line	Renace FO ruins at the WWYTP	Designation Controller Value 25th CAD			Observation of the contraction o	Dodge Dit 148 CVD	Toubleshoot filter bridge and blower	Repair 3" Vac Line 237 GVR	Repair and reinstall washwater oump	Testino equipment	Testing equipment	Replace controllers and valves at multiple locations	Replace controllers and valves at multiple locations	Replace bearing on blower	Repair Dister Motor	Repisco starters on vacuum pumps	Rebuild valve pit - dementary School	Replace controllers and valves at multiple locations	Replace tube filters in vacum pumps	Replace Pit 1129 Eagleton Circle	Replace float in Clearwell, controllers and valves	Repair UV racks at plant	Replace controllers and valves at multiple locations	System failure - replaced controllers and valves	Rebuild vacuum pump material and labor	(Applicated by the man of a second second section of the secti	Total partition service since and last late case (sum of L1 min L1 to)
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Currituck Water and Sewer, LLC

CONTROL WATER AND SERVER, ELC Docket No. W-1333, Sub 0 CALCULATION OF PLANT IN SERVICE, ACCUMULATED DEPRECIATION AND DEPRECIATION EXPENSE Test Year Ended December 31, 2021

Schedule 1-1(b)

Public Staff Morgan Exhibit I Page 5 of 5

2,021

		Plant In						
Line		Service Per	Year Placed		Years in	Annual	Accumulated	
No.	<u>ltem</u>	Public Staff [1]	In Service[1]	Life[2]	Service [3]	Depreciation [4]	Depreciation [5]	
		(a)	(b)	(c)	(d)	(e)	(1)	
	Additions since W-1130, Sub 8 rate case proceeding:							
,	Isotation valve installation	\$4,200	2016	7	5.5	\$600	(\$3,300)	
,	Isolation valve installation	4,800	2016	7	5.5	686	(3,773)	
2	UV System repair	6,392	2016	7	5.5	913	(5,022)	
Ä	Gravel roadway to plant	2,381	2016	15	5.5	159	(875)	
5	Grading and gravel entrance to plant	1.665	2016	15	5.5	111	(611)	
6	Hurrican Matthew - 4 pits replacement	6.000	2016	10	5.5	600	(3,300)	
7	EQ pump and cable replacement	2,061	2017	7	4.5	294	(1,323)	
, R	Back up motor for vac pumps	1,241	2017	7	4.5	177	(797)	
9	Ditch pump repair	9,669	2018	7	3.5	1,381	(4,834)	
10	Vacumm pump #2	16,532	2019	7	2.5	2,362	(5,905)	
11	Pump renew and replace	2.638	2020	7	1.5	377	(566)	
12	Replace Pit @ 304 GVR	2,566	2020	10	1,5	257	(386)	
13	Controllers, labor, pumps & motor miscallaneous items	11,647	2020	7	1.5	1,664	(2,496)	
14	Pump renewal	14,793	2020	7	1,5	2,113	(3,170)	
15	Reconditioned HP vacuum pump & 1 Baldor 25HP motor	19,715	2020	7	1,5	2,816	(4,224)	
15	Pump tear down and repair	4,253	2020	7	1.5	608	(912)	
17	New cornell pump furnish and installation	7,008	2020	7	1,5	1,001	(1,502)	
18	HP motor	500	2020	7	1,5	71	(107)	
19	Additional taxes due on invoices 4989/4990/4991	548	2020	7	1,5	78	(117)	
20	Sewer and plant, pump renew and replace	739	2020	7	1.5	106	(159)	
21	Complete pits	8,808	2021	10	1.0	881	(881)	
22	Engineering System - ditch motor	4,168	2021	7	1.0	595	(595)	
23	E Haddock Enterprises - excavate pit for sewer tank	5,391	2021	10	1.0	539	(539)	
24	HP Ebara sewage pump	4,822	2021	7	1.0	689	(689)	
25	Check valve furnish and installation	6,929	2021	7 `	1.0	990	(990)	
26	Pole mount lock box for controllers	10,595	2021	10	1.0	1,060	(1,060)	
27	Flovac controllers	9,607	2021	7	1.0	1,372	(1,372)	
28	263 GVR - replace pit	4,830	2021	10	1.0	483	(483)	
29	35 Flovac controllers	13,375	2021	7	1.0	1,911	(1,911)	
30	Remote mounting kits	23,952	2021	7	1.0	3,422	(3,422)	
31	Controllers, valves & rebuild service	31,704	2021	7	1.0	4,529	(4,529)	
32	Wireless monitoring system	32,025	2021	7	1.0	4,575	(4,575)	
33	Monitoring kit	1,588	2021	7	1.0	227	(227)	
34	Filter kit for vacuum pit	1,601	2021	7	1.0	229	(229)	
35	50 tons of rock driveway repair	10,350	2021	7	1.0	1,479	(1,479)	
36	Monitoring system	195,298	2022	10	1.0	19,530	(19,530)	
	•						4	40.4
37	Total plant in service since the last rate case (Sum of L1 thru L40)	\$484,389				\$58,885	(\$85,890)	12%

Plant additions since rate case proceeding, Docket No. W-1130, Sub 8. Per Public Staff Engineer Franklin.

^[1] [2] [3] [4] [5] Based on year placed in service using half year convention.
Column (a) divided by Column (c), unless fully depreciated,
Column (d) x Column (e), unless fully depreciated.