



**NORTH CAROLINA  
PUBLIC STAFF  
UTILITIES COMMISSION**

July 2, 2024

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

Re: Docket No. W-1318, SUB 1 — Application by HH Water, LLC, for Authority to Adjust and Increase Rates for Water Utility Service in High Hampton Service Areas in Jackson County, North Carolina

Dear Ms. Dunston:

In connection with the above-captioned docket, I transmit herewith for filing on behalf of the Public Staff the following:

1. The Public Staff's Motion for Leave to File Supplemental Testimony; and
2. Proposed Supplemental Testimony and Exhibits of Shashi M. Bhatta, Engineer—Water, Sewer, and Telephone Division – North Carolina Utilities Commission (Public Staff).

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

Sincerely,

/s/ James Bernier, Jr.  
Staff Attorney  
[james.bernier@psncuc.nc.gov](mailto:james.bernier@psncuc.nc.gov)

**Attachments**

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

4326 Mail Service Center • Raleigh, North Carolina 27699-4300 • Fax (919) 733-9565  
An Equal Opportunity / Affirmative Action Employer

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. W-1318, SUB 1

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-1318, SUB 1

In the Matter of		
Application by HH Water, LLC, for	)	PUBLIC STAFF'S MOTION
Authority to Adjust and Increase	)	FOR LEAVE TO FILE
Rates for Water Utility Service in High	)	SUPPLEMENTAL
Hampton Service Areas in Jackson	)	TESTIMONY
County, North Carolina	)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and, pursuant to North Carolina Utilities Commission Rule R1-7, respectfully seeks leave from the North Carolina Utilities Commission (Commission) to accept for filing the proposed Supplemental Testimony and Exhibits of Shashi M. Bhatta, Public Utilities Engineer with the Public Staff's Water, Sewer, and Telephone Division. In support of this motion, the Public Staff respectfully shows the Commission the following:

1. On January 26, 2024, HH Water, LLC (Company) filed an Application for Rate Increase in Docket No. W-1318, Sub 1 and an Amended Application on February 2, 2024 (collectively, the Application).
2. On February 19, 2024, the Commission declared the proceeding to be a general rate case and suspended rates for up to 270 days.

3. On April 11, 2024, the Commission issued an Order Scheduling Hearings, Establishing Procedural and Filing Requirements, and Requiring Customer Notice, and on April 22, 2024, the Commission issued an Order Rescheduling Public Witness Hearing, Revising Dates for Filing Reports, and Requiring Customer Notice (collectively, the Procedural Order). The Procedural Order required the Company to file its direct testimony and exhibits on or before May 10, 2024, Public Staff and intervenors to file direct testimony and exhibits on or before June 7, 2024, and the Company to file its rebuttal testimony and exhibits, if any, by June 25, 2024.

4. The Company did not file direct testimony or exhibits.

5. On June 7, 2024, the Public Staff, in relevant part, filed direct testimony and exhibits of Public Staff witness Shashi M. Bhatta.

6. Based on an inquiry from a couple existing HH Water customers on June 14, 2024, the Public Staff reviewed the Company's service area map in its files from the Company's 2005 rate case in Docket No. W-574, Sub 0, which bore the Commission's date stamp of 1976 (1976 Map); and compared the 1976 Map to the map provided by the Company in this docket (2024 Map).

7. As explained in detail in the accompanying proposed supplemental testimony, the Public Staff has identified an inconsistency between the Company's 1976 Map and its 2024 Map.

8. The inconsistency in the service area impacts the customer count in witness Bhatta's direct testimony and the Company's certificated service area, which is now at issue in this docket.

9. The Public Staff and the Company have initiated efforts to research the certificated boundaries of the Company's service area and reconcile any differences.

10. The Public Staff, therefore, wishes to file supplemental testimony to (1) identify the service area at issue in this rate case; (2) identify service area(s) for which the Company might need to file a contiguous extension application, and (2) offer further guidance, as discussed with the Company, on how to address the service areas.

11. The Public Staff takes no position with respect to whether the Commission may allow the Company to file a rebuttal to the Public Staff's Supplemental Testimony, but would respectfully request that, if the Company is afforded an opportunity to file supplemental rebuttal testimony to the Public Staff's supplemental testimony, the Public Staff be granted an opportunity to serve discovery on the Company regarding the Company's supplemental rebuttal testimony and that the Company be required to respond to such discovery as promptly as possible.

12. The Public Staff is authorized to represent that the Company does not object to this motion.

WHEREFORE, for the reasons set forth above, the Public Staff respectfully requests that: (1) the Commission grant the Public Staff leave to file the Supplemental Testimony and Exhibits of Shashi M. Bhatta and accept, for filing, the Public Staff's proposed Supplemental Testimony and Exhibits of Shashi M. Bhatta, which have been filed contemporaneously with this Motion for the

Commission's consideration; and (2) if the Commission grants the Company an opportunity to file supplemental rebuttal testimony, that the Commission grant the Public Staff an opportunity to serve discovery on the Company regarding the Company's rebuttal testimony and require the Company to respond to the Public Staff's discovery as promptly as possible.

Respectfully submitted this 2nd day of July, 2024.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

Lucy E. Edmondson  
Chief Counsel

Electronically submitted  
/s/ James Bernier, Jr.  
Staff Attorney

4326 Mail Service Center  
Raleigh, North Carolina 27699-4300  
Telephone: (919) 733-6110  
Email: [james.bernier@psncuc.nc.gov](mailto:james.bernier@psncuc.nc.gov)

## CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing Motion upon each of the parties of record in this proceeding or their attorneys of record in accordance with Commission Rule R1-39, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This this the 2nd day of July, 2024

Electronically submitted  
/s/ James Bernier, Jr.