

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. W-354, SUB 360

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

| | | |
|---|---|------------------------------|
| In the Matter of |) | |
| Application of Carolina Water Service, Inc. |) | |
| Of North Carolina for Authority to Adjust |) | |
| and Increase Rates for Water and Sewer |) | PETITION TO INTERVENE |
| Utility Service in All Service Areas |) | OF THE COROLLA LIGHT |
| in North Carolina except Corolla Light and |) | COMMUNITY ASSOCIATION |
| Monteray Shores Service Area |) | |

The Corolla Light Community Association, Inc. (Petitioner), by and through its undersigned attorneys, respectfully requests that the North Carolina Utilities Commission (the Commission) allow it to intervene in the above-reference docket, pursuant to N.C.G.S. § 62-72 and Rule R1-19 of the Rules and Regulations of the Commission, and grant Petitioner leave to participate fully as a party in this docket. In support of this Petition, Petitioner shows the Commission the following:

1. Petitioner is a homeowners association organized as a non-profit corporation existing under the laws of the State of North Carolina.
2. Petitioner’s principal office is located at 1197 B Franklyn Street, Corolla, NC 27927 and its mailing address is PO Box 490, Corolla, NC 27927-0290.
3. Petitioner’s representative in this proceeding, to whom all notices, pleadings and other documents related to this proceeding should be directed is

The Allen Law Offices, PLLC
Dwight W. Allen
Britton H. Allen

Brady W. Allen
1514 Glenwood Ave, Suite 200
Raleigh, NC 27608
Telephone: (919)-838-5175

4. Petitioner's membership includes more than 450 homeowners in the Corolla Light Development (Corolla Light). Corolla Light was established in 1985.
5. The current supplier of wastewater treatment service to Corolla Light is Carolina Water Services, Inc.
6. The Commission granted Carolina Water Services, Inc. a previous rate increase on March 22, 2011, and the residents of Corolla Light were singled out for disparate rate treatment and significantly impacted by the Commission's Order.
7. Petitioner intervened in three of Carolina Water Services, Inc.'s more recent rate increase proceedings in Docket No. W-354, Sub 336 and Docket No. W-354, Sub 344, and Docket No. W-354, Sub 356. In all three dockets the Commission issued an Order Granting Partial Rate Increase, Approving Rate Adjustment Mechanism and Requiring Customer Notice on March 10, 2014, December 7, 2015, and November 8, 2017 that held in future general rate case proceedings the issue of rate disparity should be reviewed again by CWSNC, the Public Staff, and any other interested party and appropriate consideration should be given to moving the Corolla Light Monterey Shore (CLMS) service

area toward uniform rates in light of the facts and circumstances that exist at that time.¹

- 8. Petitioner’s members use waste water treatment services sold by Carolina Water Services, Inc. through the Corolla Light Wastewater Disposal System. Carolina Water Services, Inc.’s filing could affect the rates associated with Carolina Water Services, Inc.’s sale of water and wastewater treatment services, including the wastewater treatments services of residents in Corolla Light. As such, Petitioner and its members have a keen interest in the subject matter of these proceedings to ensure an adequate and quality supply of services at a reasonable price.

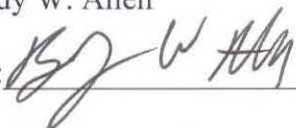
- 9. Petitioner agrees to accept electronic service of all filings in the Docket.

WHEREFORE, Petitioner respectfully requests that the Commission enter an order allowing Petitioner to intervene and fully participate in the above-captioned proceeding, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenors under North Carolina law.

Respectfully submitted, this 24th day of Sept., 2018.

ALLEN LAW OFFICES, PLLC

Dwight W. Allen
Britton H. Allen
Brady W. Allen

By:  _____

¹ This was also part of a Stipulation entered into by Carolina Water Service, Inc. of North Carolina, the Public Staff and Corolla Light Community Association, Inc., which was filed with the Commission in the three previous rate increase proceedings.

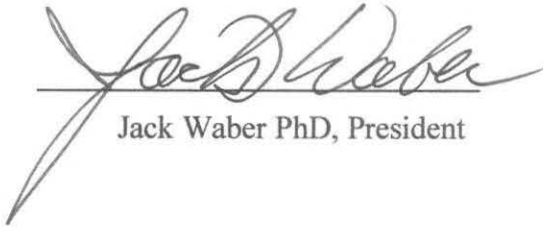
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Attorneys for Corolla Light Community Association, Inc.


PENNSLYVANIA
CHESTER COUNTY

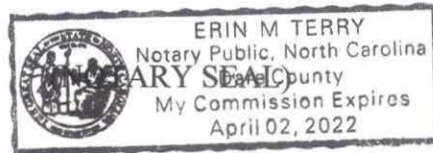
VERIFICATION

The undersigned, Jack Waber, being first duly sworn, deposes and says that he is the President of Corolla Light Community Association, Inc., and that he has read the foregoing Petition to Intervene; that to his personal knowledge, the matters stated therein are true and correct, except for those matters that are stated on information and belief and as to those matters, he believes them to be true and that he is authorized to sign this Petition on behalf of Corolla Light Community Association, Inc.


Jack Waber PhD, President

Sworn to and subscribed before me
this 17th day of September 2018.


Notary Public
My Commission Expires: April 02, 2022




CERTIFICATE OF SERVICE

I certify that on this day true and exact copies of the foregoing Petition to Intervene were served by depositing same in the United States Mail, first class postage prepaid, or via electronic mail delivery, addressed to counsel of record for all parties to this docket.

This the 24th day of Sept., 2018.

ALLEN LAW OFFICES, PLLC

By: 

Brady W. Allen