

**SANFORD LAW OFFICE, PLLC**

Jo Anne Sanford, Attorney at Law

August 25, 2021

Ms. 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 384  
Application by Carolina Water Service, Inc. of North Carolina for  
Authority to Adjust and Increase Rates for Water and Sewer Utility  
Service in All Service Areas in North Carolina  
Corrections to Direct Testimony of Dana Hill

Dear Ms. Dunston:

On July 2, 2021, Carolina Water Service, Inc. of North Carolina (“CWSNC” or “the Company”) filed the Direct Testimony of Dana Hill (“Hill Testimony”). Since that filing, the Company has determined that the Hill Testimony contained certain incorrect non-revenue purchased water figures on the chart on pages 8 and 9. Corrected pages of the Hill Testimony, specifically (i) the chart on pages 8 and 9, and (ii) corrected testimony on page 8, lines 12 and 14, are attached in redline and clean formats.

Additionally, within one business day, as required by Commission Rule R1-28(e)(1), CWSNC will file with the Clerk fifteen (15) paper copies of the corrected pages of the Hill Testimony.

By copy of this letter, the Company is providing copies to all parties of record by electronic delivery.

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  
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c: Parties of Record

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **Corrections to Direct Testimony of Dana Hill** has been served on the parties of record to Docket No. W-354, Sub 384, 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 25th day of August, 2021.

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

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**Attorney for Carolina Water Service,  
Inc. of North Carolina**

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internal treatment such as chemical feeds in an effort to quantify true unidentified loss; and

(3) leak identification through district metering in systems with significant unidentified loss. This process consists of installing large diameter meters strategically throughout the system and comparing the volume of water passing into a geographical “sub-area” with the volumes billed to customers to identify specific sections of concern. Acoustic leak detection technology is utilized to locate potential repair needs. American Water Works Association (“AWWA”) water audits are performed on all systems annually, and system specific reviews are conducted monthly by operations staff. As a result of the increased focus on non-revenue water, ~~approximately half~~ five of the purchase systems decreased in loss percentage in 2020 compared to 2019 and most of the remaining ~~half~~ systems showed no significant increase, as shown below:

SYSTEM	2020 % loss	2019 % loss
Whispering Pines	7.6	14.1
High Vista	35.7	<u>24.9</u> <del>48.6</del>
<del>Chalet Village</del>	<u>30</u>	<u>30.8</u>
Riverbend	35.2	<u>47.2</u> <del>38.6</del>
Woodrun	31.4	<u>27.2</u> <del>32.7</del>
Kings Grant	26.5	<u>16.7</u> <del>27.2</del>
Riverpointe	8.6	<u>9.9</u> <del>9.6</del>
Carolina Trace	11.7	9.3
Tanglewood	<u>14.6</u> <del>15.7</del>	<u>14.0</u> <del>14.7</del>
Zemosa Acres	22.6	<u>23.2</u> <del>17.3</del>
Carolina Forest	26	<u>38.6</u> <del>25.3</del>

SYSTEM	2020 % loss	2019 % loss
Lamplighter	12.9	<u>11.7</u> <del>12.2</del>
Yorktown	10.5	<u>9.8</u> <del>10.1</del>
Bent Creek	5.5	5.4

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This strategy is consistent with the principles of the AWWA M36 Manual (“Water Audits and Loss Control Programs”) and addresses NRW based upon the system-specific economic level of intervention. In addition to the previously described efforts, the Company continues to regularly review vacancy and zero consumption reports to ensure that all billable volumes are accurately captured. The Company reviews its strategy on a regular basis and updates as necessary, based on whether or not tangible results are achieved.

**Q. IS THIS TESTIMONY TRUE AND ACCURATE TO THE BEST OF YOUR KNOWLEDGE, INFORMATION, AND BELIEF?**

A. Yes.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes, it does. However, I reserve the right to update or amend this testimony upon receipt of additional relevant data or other information that may become available.

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