

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

September 2, 2022

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

**Via Electronic Delivery**

Re: Application by Carolina Water Service, Inc. of North Carolina for Certificate of Public Convenience and Necessity to Serve Current Territory of Carteret County Water System  
NCUC Docket No. W-354, Sub 399  
Supplemental Filing: DNRCD/DEQ Letters Reflecting Plan Approvals

Dear Ms. Dunston:

On Monday, August 29, 2022, Carolina Water Service, Inc. of North Carolina (“CWSNC” or “Company”) agreed to conduct a search for letters from the “Department of Environment and Natural Resources” (now the “Department of Environmental Quality,” or “DEQ”) reflecting plan approvals for the Carteret County water system. The Company’s position, explained in this docket and tracking its position in the related “Fair Value” case, Docket No. W-354, Sub 398, is that the need for these plan approval letters is obviated by the subsequent permit approval documents that have issued from DEQ and its predecessor agencies, and that the provision of these other permit approvals should suffice for examination in this case. However, the CPCN form identifies these plan approval letters and the Public Staff expresses an interest in them; thus, CWSNC has searched for same and found 18 of 20 approval letters that were mentioned in the DEQ records. The Company is pleased to submit these plan approvals in an effort to resolve (what we believe to be) all outstanding requests, in order to allow consideration of this docket to proceed past the threshold filing.

With assistance from DEQ, CWSNC tracked the applicable records to the Wilmington Regional Field Office of DEQ. After a thorough search, CWSNC located plan approval letters for 18 of 20 reviews referenced. For one of the two

[sanford@sanfordlawoffice.com](mailto:sanford@sanfordlawoffice.com)

P.O. Box 28085, Raleigh NC 27611-8085

919.210.4900

remaining projects, it appears there may not have been a plan approval, and the remaining one was simply not found. The Company respectfully submits that this supplemental response complies with filing requirements and with the Public Staff's requests, and that the Application should be deemed complete for purposes of meeting the threshold filing requirements.

Given the level of security exercised by DEQ in its management of these and other supporting plan documents, and in the interest of caution regarding infrastructure issues, CWSNC is filing these letters using the Commission's "confidential" mechanism.

I hereby certify that a copy of this filing has been served on the Public Staff and on the County Attorney for Carteret County.

As always, we thank you and your staff for your assistance; please feel free to contact me if there are questions or if additional information is required.

**Electronically Submitted**

**/s/Jo Anne Sanford**

North Carolina State Bar No. 6831

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