

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-354, Sub 398

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application by Carolina Water) Service, Inc. of North Carolina,) 5821 Fairview Road, Suite 401,) Charlotte, North Carolina) 28209, for Determination of Fair) Value of Utility Assets Pursuant) to N.C. Gen. Stat. § 62-133.1A) and Establishing Rate Base for) Acquisition of the Carteret) County Water System)) REQUEST FOR EXTENSION OF) TIME TO COMPLETE AND FILE) RESPONSE TO CUSTOMER) SERVICE QUALITY) COMPLAINTS
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NOW COMES Carolina Water Service, Inc. of North Carolina (“CWSNC” or “Company”) and requests additional time to complete its investigation and file its report addressing customer service and service quality complaints expressed at the Beaufort public hearing, which was held on October 18, 2022. The Commission’s scheduling order of September 13, 2022, at Ordering Paragraph 4, page 6, required that the report be filed within 14 days after the public witness hearing, which produced a due date of Tuesday, November 1, 2022. The Company, continuing in its efforts to investigate, missed the deadline for filing and requests that the Commission extend that deadline by seven days (until November 8th). In support thereof, CWSNC says the following:

1. Four customers brought forward service quality complaints:
 - a. Patrick Kelly, Jennifer Day and Liz Ponder complained of a mysterious drop in pressure during evening hours;
 - b. Lisa Camp, Jennifer Day and Liz Ponder complained of yellow water; and
 - c. Liz Ponder complained of a chalky residue.
2. Company investigations began within three days of the hearing,

including visits to the residences to investigate, collection of samples for analysis, and assessment of the elevated storage to try to determine whether there were pressure anomalies.

3. Thus far, no evidence of or determination of possible causes for the yellow water and pressure complaints has been determined. The investigation continues.
4. Response from County. CWSNC consulted with Carteret County sources and is advised that Carteret County had received no complaints concerning yellow water or pressure issues prior to the public hearing in Beaufort. The County conveys to CWSNC its understanding that both issues have been investigated by CWSNC and “are unsubstantiated at this point,” and that the County continues to monitor the situation as well.
5. On Thursday, November 3, 2022, the first day of the evidentiary hearing, counsel for CWSNC (undersigned): realized the due date had passed and the report was not complete; informed the Commission staff and the Public Staff immediately and in writing of the failure to timely file; indicated additional time until Tuesday, November 8th was requested (a one week extension); and stated that she would request the extension by oral or written motion.
6. As is the practice, the Public Staff’s response to the intention to file for an extension was sought; the answer on Friday the 4th was that the Public Staff did not object so long as it had a chance to file supplemental testimony based on the final report.
7. During the evidentiary hearing in this matter, on Friday, November 4th, 2022, counsel and State President Donald H. Denton, III---at the request of the Public Staff and with the Commission’s permission---reported on the status of the investigation and on the inability, thus far, to substantiate instances of yellow water or pressure anomalies.
8. The undersigned counsel for CWSNC:

- a. Apologizes for missing the due date and failing to adhere to the Commission's schedule set forth in the Scheduling Order;
- b. Submits that the subject of customer service is arguably more relevant to the W-354 Sub 399 Certificate of Public Convenience and Necessity ("CPCN") "transfer" docket---scheduled to be heard in 2023---than to the Fair Value "valuation" docket, which in turn suggests that a very brief delay in filing to allow for a more complete investigation is unlikely to impair any party's position in this proceeding;
- c. States that, particularly in light of the absence of substantiation of causes for any of the complaints¹ thus far, the additional time to investigate is warranted.

WHEREFORE, CWSNC respectfully requests that the Commission extend the time for filing the response to customer service complaints until Tuesday, November 8, 2022.

Respectfully submitted, this the 7th day of November, 2022.

Electronically Submitted

s/Jo Anne Sanford

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¹ With the exception of the chalky residue noted by Ms. Ponder, which is likely due to the very common issue of hardness in the water.

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of this Motion for Extension of Time has been served on all parties or their counsel of record in these dockets by either depositing same in a depository of the United States Postal Service, first-class postage prepaid, or by electronic delivery.

This the 7^h day of November, 2022.

/s/Jo Anne Sanford

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