

1. On September 29, 2022, the Public Staff filed the *Public Staff's Motion to Raise the Amount of Bond of Water Resources, Inc.* ("Public Staff's Motion"), reciting a voluminous record of the history, actions on the part of the Company, and regulatory and civil enforcement action related to Water Resources' Rocky River Subdivision water system.

2. The Company desires an opportunity to respond to the statements, allegations, and conclusions contained in the Public Staff's Motion.¹

3. There is presently no Commission-established deadline nor any statutory deadline for the filing of a response to the Public Staff's Motion.

4. In the absence of any Commission-established or statutory deadline, the Commission's usual procedure is to allow for responsive filings within ten (10) days.

5. Due to the complexity of the issues involved in this proceeding and the length and detail of the statements contained in the Public Staff's Motion, ten (10) days will not allow the Company sufficient time to adequately respond.

¹ Pursuant to N.C. Gen. Stat. § 62-65(a), the decisions and orders of the Commission must be supported by competent material and substantial evidence upon consideration of the whole record. Water Resources requires sufficient time to gather evidence and prepare its responsive filing to ensure that the Commission's decision is based upon a fully-developed record of evidence. To briefly forecast the issues in dispute and the present lack of a fully developed record, the Company notes that some of the statements included in the Public Staff's Motion are contradicted by the conclusions reached by the Public Staff just ten (10) months ago in its Report and Recommendations that was filed on December 20, 2022. In addition, the Public Staff omitted mention of the most recent filing by the Company in these dockets, which recites an extensive record of actions on the part of the Company to resolve the issues raised in the Public Staff's Motion.

WHEREFORE, Water Resources respectfully moves the Commission to allow Water Resources 45 days in which to respond to the Public Staff's Motion prior to taking action thereon.

Respectfully submitted this 3rd day of October, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time has been served by electronic delivery upon the parties of record.

This the 3rd day of October, 2022.

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