

SANFORD LAW OFFICE, PLLC

Jo Anne Sanford, Attorney at Law

June 29, 2022

Via Electronic Filing

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

Re: Carolina Water Service, Inc. of North Carolina
Docket No. M-100, Sub 163
Verified Response to Investigation Regarding the Ability of North
Carolina's Electricity, Natural Gas, and Water/Wastewater Systems
to Operate Reliably During Extreme Cold Weather

Dear Ms. Dunston:

On January 26, 2022, the North Carolina Utilities Commission (Commission or NCUC) entered an *Order Opening Investigation, Scheduling Technical Conferences, Requiring Responses, and Allowing Comments and Reply Comments* in Docket Nos. E-100, Sub 173 and M-100, Sub 163. Carolina Water Service, Inc. of North Carolina (CWSNC or Company) was made a party to Docket No. M-100, Sub 163 and was required to file a response to the questions set forth in Appendix A of the January 26th Order on or before February 23, 2022. The Commission Order further provided that representatives of CWSNC were required to present their responses and answer Commission and Public Staff questions at a technical conference to be held on March 15, 2022, starting at 9:30 a.m., in Commission Hearing Room 2115.

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On February 23, 2022, CWSNC filed the Company's Verified Response to the questions posed by the Commission. The Company's Response was verified by Matthew Schellinger, CWSNC's Financial Planning and Analysis Manager.

On March 15, 2022, CWSNC appeared before the Commission at the Technical Conference wherein the Commission, the Public Staff, Aqua North Carolina, Inc. (Aqua), and CWSNC discussed matters related to the reliability of water and wastewater operations provided by the Company during extremely cold weather.¹ During and after the Conference, CWSNC was requested to answer additional questions and to file responses to those questions in the docket. CWSNC's responses to questions and requests posed by the Commission and the Public Staff were filed with the Commission on April 21, 2022; the Company's Response was verified by Dana Hill, CWSNC's Director of Operations for the Company's Eastern Region.

On May 12, 2022, the Commission entered an Order Requesting Comments directing the parties to this docket, including CWSNC, to address the question of whether the Commission's rules require revision in order to ensure reliable utility operations during extreme cold weather. The Commission noted that the water and sewer utility industry, unlike the electric and natural gas industries, has no analogous rules addressing emergency operations.

CWSNC has carefully reviewed all of the information, written and verbal, which the Company has presented to date to the Commission and Public Staff

¹ Donald Denton, CWSNC's President, and Dana Hill, CWSNC's Director of Operations for the Company's Eastern Region, appeared on behalf of the Company and responded to questions from the Commission and the Public Staff.

regarding its ability to operate reliably during extreme cold weather and has no further information to provide at this time. Furthermore, CWSNC does not believe that the Commission's rules require revision in order to ensure reliable water and wastewater utility operations by the Company during extreme cold weather.

I hereby certify that this filing has been provided today to each of the parties of record to Docket No. M-100, Sub 163 by means of electronic service.

As always, thank you and your staff for your assistance; please feel free to contact me if there are any questions or suggestions.

Sincerely,

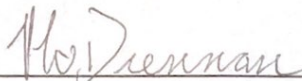
Electronically Submitted

/s/Jo Anne Sanford
Sanford Law Office, PLLC
State Bar No. 6831

Attorney for Carolina Water Service,
Inc. of North Carolina

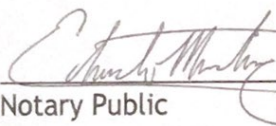
VERIFICATION

Philip J. Drennan, being duly sworn, deposes and says: that he is the Regional Director of Financial Planning and Analysis for Carolina Water Service, Inc. of North Carolina (CWSNC); that he is familiar with the facts set out in the Verified Response to Investigation Regarding the Ability of North Carolina's Electricity, Natural Gas, and Water/Wastewater Systems to Operate Reliably During Extreme Cold Weather filed by CWSNC in Docket No. M-100, Sub 163; that he has read the foregoing Verified Response and knows the contents thereof; and that the same is true of his knowledge except as to those matters stated therein on information and belief, and as to those he believes them to be true.

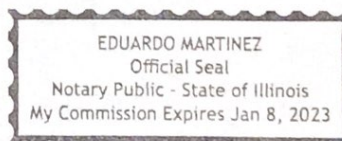


Philip J. Drennan

Sworn to and subscribed before me this
the 29 day of June, 2022.



Notary Public



My Commission Expires: 01/08/2023