

**SANFORD LAW OFFICE, PLLC**

Jo Anne Sanford, Attorney at Law

June 12, 2020

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

**Via Electronic Delivery**

Re: Aqua North Carolina, Inc.: Docket No. W-218 Sub 526  
Application by Aqua North Carolina, Inc., 202 MacKenan Court,  
Cary, North Carolina 27511, for Authority to Adjust and Increase  
Rates for Water and Sewer Utility Service in all Service Areas in  
North Carolina  
Motion for One Calendar Day Extension of Time to File One Item  
of Rebuttal Testimony

Dear Ms. Campbell:

Attached please find a Motion to extend the filing deadline for one item of Rebuttal testimony (the combined testimony of Shannon Becker and Joe Pearce) until noon tomorrow (Saturday, June 12<sup>th</sup>). Filed under separate cover in this docket today, on behalf of Aqua North Carolina, Inc., is the Rebuttal testimony of the following witnesses:

- Edward Thill
- Paul J. Hanley
- Amanda Berger
- Dean R. Gearhart
- Joe Pearce/George Kunkel

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 Aqua North Carolina, Inc.

c: Parties of Record

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. W-218, SUB 526

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
Application by Aqua North Carolina, Inc.,	) AQUA NORTH CAROLINA,
202 MacKenan Court, Cary, North Carolina	) INC.'S MOTION FOR
27511, for Authority to Adjust and Increase	) EXTENSION OF TIME TO
Rates for Water and Sewer Utility Service	) FILE ONE ITEM OF
in All Its Service Areas in North Carolina	) REBUTTAL TESTIMONY

**NOW COMES AQUA NORTH CAROLINA, INC.** (“Aqua” or “Company”), by and through the undersigned counsel, and requests a one-day extension of time, until noon on Saturday, June 13, 2020, to file one item of rebuttal testimony,

In support of this Motion, Aqua respectfully shows the Commission the following:

1. On December 31, 2019, Aqua North Carolina, Inc. (“Aqua” or “Company”), filed an application with the Commission requesting authority to adjust and increase its rates for water and sewer utility services in all its service areas in North Carolina, effective January 30, 2020.

2. On February 14, 2020, the Commission issued its Order Scheduling Hearings, Establishing Discovery Guidelines, and Requiring Customer Notice (“Scheduling Order”). Among other things, the Scheduling Order provides that “the direct testimony and exhibits of the Public Staff and other intervenors on all subjects except the subject of the public witness hearings shall be filed at or before 12:00 p.m. on Tuesday, May 19, 2020, and that the rebuttal testimony of Aqua, if any, shall be filed at or before 5:00 p.m. on Friday, June 5, 2020.”

3. The Scheduling Order also established the dates, times, and locations for six public witness hearings to take place in April 2020 and an expert witness hearing to begin on June 23, 2020.

4. On May 12, 2020, The Public Staff, for good cause shown, requested an extension of time to file its testimony, from May 19<sup>th</sup> to May 26<sup>th</sup> (with the exception of the testimony of John R. Hinton, which was to be filed as originally due, on May 19<sup>th</sup>).

5. Aqua did not object to the Public Staff's request, so long as the Company was given a commensurate amount of additional time to file its rebuttal testimony, which was a request to move the rebuttal due date from June 5, 2020 until June 12<sup>th</sup>, which is today.

6. Aqua and the Public Staff have spent an exceptional amount of time in meetings and individual conversations, as well as in exchanging documents, schedules and accounts. The net result, so far, has been to agree on a number of matters, as will be reflected in a revised Schedule 1, to be filed next week. Discussions and exchanges of calculations and information continue. The time spent in these efforts has been productive and valuable, but has made it difficult to simultaneously prepare rebuttal testimony, particularly given the advantages of agreement and the necessity of diligence in pursuing same.

7. Aqua will file today, in a timely manner, the rebuttal testimony of Edward Thill, Paul Hanley, Amanda Berger, Dean Gearhart, and a combined filing by Joe Pearce and George Kunkel. The Company is unable to meet the filing deadline today at 5:00 p.m. for the last piece of testimony, which is the combined filing of rebuttal testimony by Shannon Becker and Joe Pearce. However, Aqua can and will

provide this rebuttal testimony to the parties and to Commission Staff by noon tomorrow, Saturday, June 13, 2020. It can be submitted for filing to the NCUC docket system at the same time, albeit with the understanding that the stamped date of filing would be Monday, June 15, 2020.

5. For the reasons set forth herein, Aqua requests until noon tomorrow, June 13, 2020, to provide to all parties and to submit to the docket system the Company's last item of rebuttal testimony, the combined rebuttal testimony of Shannon Becker and Joe Pearce.

6. The Public Staff and Attorney General have been consulted and do not oppose this Motion.

WHEREFORE, Aqua respectfully requests an extension of time, until noon on Saturday, June 13, 2020, to file and serve the combined rebuttal testimony of Shannon Becker and Joe Pearce.

Respectfully submitted this the 12th day of June 2020.

**ATTORNEYS FOR AQUA NORTH CAROLINA, INC.  
Electronically Submitted**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE COMBINED REBUTTAL TESTIMONY OF SHANNON BECKER AND JOE PEARCE**, filed by Aqua North Carolina, Inc. in Docket No. W-218, Sub 526, has been served on the Public Staff, North Carolina Utilities Commission, and the Attorney General, by electronic transmission.

This the 12th day of June, 2020.

**ATTORNEY FOR AQUA NORTH CAROLINA, INC.  
Electronically Submitted**

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