

**SANFORD LAW OFFICE, PLLC**

Jo Anne Sanford, Attorney at Law

March 17, 2023

A. Shonta Dunston, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

**Via Electronic Delivery**

Re: Docket No. W-354, Sub 400  
Application by CWSNC for Authority to Adjust and Increase Rates  
and Charges for Water and Sewer Utility Service in All Service Areas  
of North Carolina and Approval of a Three-Year Plan  
--CWSNC Verified Recommendations regarding Metrics, Incentives  
and Penalties

Dear Ms. Dunston:

Attached for filing please find the verified Recommendations, submitted by Carolina Water Service, Inc. of North Carolina ("CWSNC" or "Company") with respect to *Performance Metrics, Incentives and Penalties*.

On February 2, 2023, in the filing of its Proposed Order in this case, CWSNC committed (as did the Public Staff) to file recommendations to address the topic of penalties and incentives on the agreed-upon performance metrics, as applicable, by March 17, 2023, a date sooner than had been agreed upon by the two parties in their Settlement Agreement of November 22, 2022.

The parties have worked diligently and through the day of this filing to resolve differences. A number have been resolved but some remain, so the Company and the Public Staff are filing separate recommendations.

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**  
Sanford Law Office, PLLC

**/s/Jo Anne Sanford**  
N.C. State Bar No. 6831

**/s/ Kay Pashos, Pro Hac Vice**  
Ice Miller LLP  
One American Square, Ste. 2900  
Indianapolis, Indiana 46282-0200  
T: 317-236-2208  
e-mail: [kay.pashos@icemiller.com](mailto:kay.pashos@icemiller.com)

**/s/ Mark Alson, Pro Hac Vice**  
Ice Miller LLP  
One American Square, Ste. 2900  
Indianapolis, Indiana 46282-0200  
T: 317-236-2263  
e-mail: [mark.alsen@icemiller.com](mailto:mark.alsen@icemiller.com)

**Attorneys for CWSNC**