

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-354, SUB 344

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of

Application by Carolina Water Service, Inc. of)
North Carolina, 2335 Saunders Road, Northbrook,)
Illinois 60062, for Authority to Adjust and Increase)
Rates for Water and Sewer Utility Service in All of)
Its Service Areas in North Carolina)

JOINT MOTION TO
RESCHEDULE
EVIDENTIARY HEARING
AND EXTEND FILING
DATES

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission (Public Staff), by and through its Chief Counsel, Antoinette R. Wike, Carolina Water Service, Inc. of North Carolina (CWSNC or Company), and Corolla Light Community Association, Inc. (CLCA), (collectively, "the Parties") by and through counsel, to request that the North Carolina Utilities Commission (Commission) reschedule the evidentiary hearing in this docket to allow the Company time to conclude 10 nearly-complete or completed but not documented construction projects (Projects) so that those Projects may be included in the Company's cost of service once their final costs have been determined and requisite invoices and other documentation have been provided to the Public Staff for review and verification and incorporated in the Public Staff's pre-filed testimony and the Parties' stipulation and settlement agreement, which the Parties plan to file in this docket. The Parties also request that the Commission grant the Public Staff and Intervenor additional time to pre-file testimony supporting the Parties' stipulation and settlement agreement in this docket.

In support of this Joint Motion, the Parties respectfully show the following:

1. On March 31, 2015, the Company filed an application for a general rate increase in this docket. On May 26, 2015, the Commission issued a Reissued Order in this docket, which scheduled the case for public and evidentiary hearings and required the Company to provide its customers with public notice of such hearings. The public hearings have now been concluded. The Reissued Order also specified that the Public Staff and Intervenors should pre-file testimony no later than September 15, 2015, and also provided that CWSNC should file rebuttal testimony no later than September 22, 2015.

2. On September 14, 2015, the Public Staff filed a motion for extension of time for the Public Staff and Intervenors to pre-file testimony until September 25, 2015 and for the Company to file rebuttal testimony until September 30, 2015. This motion was granted by Order dated September 16, 2015.

3. On September 25, 2015, the Public Staff filed a second motion for extension of time for the Public Staff and Intervenors to pre-file testimony, until October 1, 2015, noting that the Parties had reached settlement in principle and intended to file a stipulation and settlement agreement resolving all issues in this docket. This motion was granted by Order dated September 25, 2015.

4. Because the Company has been diligently attempting to complete 10 outstanding Projects for inclusion in the present case, the Parties determined that it would be a better use of the Commission's time and that of the Public Staff's to present one final stipulation and settlement agreement that incorporates final costs of all Projects intended

to be included for recovery in this rate case and associated schedules for the Commission's review and consideration.

5. The Company has completed nine of the 10 outstanding Projects as of the date of this Joint Motion and is in the process of providing all required documentation to the Public Staff. At the present time, it is anticipated that the one remaining Project will be completed within the next week.¹ The Company anticipates being able to close out all of the Projects, get them in service and provide final invoices and documentation to the Public Staff for review and verification by Friday, October 9, 2015. These 10 Projects are more particularly described in Appendix A, which is attached. The Company's investment in these Projects will total approximately \$4,604,244.

6. By law, pursuant to G.S. 62-135, CWSNC would be entitled to put temporary rates under bond into effect on November 29, 2015, if a final order has not, as of that date, been issued by the Commission. Because the Company is hereby requesting that the time for evidentiary hearing and the record be held open for an additional period (not to exceed 30 days) beyond the October 5, 2015 date the evidentiary hearing is presently scheduled to be convened, the Company agrees to extend by the same number of days the evidentiary hearing is delayed, the date upon which it would otherwise be entitled to place temporary rates in effect under bond pursuant to G.S. 62-135.

7. The Parties request an opportunity to work with the Commission to identify a date for the evidentiary hearing, not to exceed 30 days of the currently-scheduled October 5th evidentiary hearing date, and a date for the Parties to file a stipulation and settlement agreement and supporting testimony. The Parties will file their recommended

¹ The one remaining Project is the Mt. Mitchell hydro tank removal BP install.

dates for the evidentiary hearing and for the filing of settlement-related testimony on or before Friday, October 9, 2015. At this time, the Parties request that the Commission tentatively hold the morning of Tuesday, October 20, 2015, on its calendar for resumption of the evidentiary portion of this case, pending receipt of the Parties' final recommendations.

8. In light of the fact that customers were given notice of the evidentiary hearing date of October 5, 2015, and informed that they would be given an opportunity to provide testimony, the Parties request that this hearing be convened as scheduled for receipt of customer testimony only.

THEREFORE, the Parties request that the Commission grant this Joint Motion and continue the evidentiary portion of the October 5, 2015 hearing to a future date and time to be determined and set by further Order; approve an extension of time for the Parties to finalize and file a stipulation and settlement agreement and supporting pre-filed testimony to a future date to be determined and set by further Order; authorize the Parties to file recommended dates for the evidentiary hearing and for the filing of settlement-related testimony on or before Friday, October 9, 2015; and convene the hearing presently scheduled for October 5, 2015, for receipt of customer testimony only. Further, the Parties request that the Commission tentatively hold the morning of Tuesday, October 20, 2015, on its calendar for resumption of the evidentiary portion of this case, pending receipt of the Parties' final recommendations.

Respectfully submitted, this the 1st day of October, 2015.

Carolina Water Service, Inc. of North
Carolina

By:

Electronically submitted
s/ Robert H. Bennink, Jr.
Bennink Law Office
130 Murphy Drive
Cary, North Carolina 27513

Corolla Light Community Association Inc.

By:

Electronically submitted
s/ Dwight W. Allen
The Allen Law Offices, PLLC
1514 Glenwood Ave., Suite 200
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Public Staff - North Carolina Utilities Commission

By:

Electronically submitted
s/ Gina C. Holt
Staff Attorney
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CERTIFICATE OF SERVICE

I certify that a copy of this Joint Motion to Reschedule Evidentiary Hearing and Extend Filing Dates has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 1st day of October, 2015.

/s/ Gina C. Holt

CAROLINA WATER SERVICE, INC. OF NC

Docket No. W-354, Sub 344

APPENDIX A

Line No.	Work Order	System Name	Project Description	Estimated Cost	
				Water	Sewer
1.		Old Point	Hydro tank Well #2 - 10,000 gal.	\$48,000	\$0
2.	2014019	Riverpointe	Clarifier Installation	0	403,914
3.	2015032	Misty Mountain	AMR installation	96,877	0
4.	2015135	Linville Ridge	Hydro tank - 2,300 gal.	42,000	0
5.	2015088	Mt. Mitchell	Hydro tank removal BP install	37,558	0
6.	2015069	Nags Head	Effluent filter installation	0	332,022
7.		Brandywine Bay/Spooners Creek	WWTP renovations	0	30,000
8.	2015122	Nags Head	Install generator	0	46,396
9.	2013003	Belvedere Middlepoint	Effluent disposal system improv.	0	3,405,799
10.	2015033	Mt. Mitchell	AMR installation	161,678	0
11.	Total CWIP Projects			<u>\$386,113</u>	<u>\$4,218,131</u>