

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-1034, SUB 8

DOCKET NO. W-1034, SUB 10

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-1034, SUB 8)	
)	
In the Matter of)	
Application by Water Resources, Inc., for)	
Authority to Increase Rates for Water Utility)	
Service in Rocky River Plantation Subdivision in)	
Cabarrus County and River Walk Subdivision in)	
Mecklenburg County, North Carolina)	
)	
DOCKET NO. W-1034, SUB 10)	MOTION FOR EXTENSION OF
)	TIME
In the Matter of)	
Lenny DeVitto, 8529 Indian Summer Trail,)	
Harrisburg, North Carolina 28075,)	
)	
Complainant)	
)	
v.)	
)	
Water Resources, Inc.,)	
)	
Respondent)	

NOW COMES Respondent Water Resources, Inc. (“Water Resources” or “the Company”), by and through the undersigned counsel and moves the Commission to grant an extension of time for compliance with the requirements of Ordering Paragraph No. 1 of the Commission’s *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation*, which was issued in the above-captioned proceeding on September 21, 2021. In support of this Motion, Water Resources respectfully shows unto the Commission as follows:

1. On September 21, 2021, in the above-captioned proceeding, the Commission issued an *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation*.

2. Pursuant to Ordering Paragraph No. 1 of the Commission's *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation*, Water Resources is required to replace all water meters in the Rocky River Plantation Subdivision within four months of the date of that Order.

3. Four months from the date that the Commission issued its *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation* is Friday, January 21, 2022.

4. On December 20, 2021, in the above-captioned proceeding, Water Resources filed a Report on Meter Replacement Project, detailing its efforts through that date undertaken to comply with Ordering Paragraph No. 1 of the Commission's *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation*, stating, in part, that:

Since that Order was issued, Water Resources has ordered replacement meters for the Rocky River Plantation subdivision and the replacement meters have been delivered. Water Resources' contractor is scheduled to begin meter replacement work in Rocky River Plantation this week. That work is expected to be completed prior to the January 21 deadline...

Report on Meter Replacement Project, No. W-1034, Sub 8, N.C.U.C. (*filed* December 20, 2021).

5. Since December 20, 2021, Water Resources has continued to work diligently to complete the meter replacements in the Rocky River Plantation Subdivision.

6. As of the date of this filing, Water Resources has replaced 34 of the 105 meters serving customers in Rocky River Planation Subdivision.

7. Despite its diligent efforts to replace all meters in Rocky River Plantation Subdivision, Water Resources has encountered unexpected delays that are beyond the Company's control, including, a delay in delivery of the meters, inclement weather that prevented meter replacement work, and an unanticipated amount of silt buildup inside meter boxes that doubled the per meter change-out work time, as compared to that initially estimated.

8. Despite the delays experienced, Water Resources continues to make diligent efforts to comply with the requirements of Ordering Paragraph No. 1 of the Commission's *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation*.

9. Water Resources intends to fully comply with the requirements of Ordering Paragraph No. 1 of the Commission's *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation*, as soon as possible, but will be unable to do so before January 21, 2022, because of delays beyond the control of the Company.

10. The Company will provide further updates to the Commission as milestones are achieved and when the full meter replacement is complete.

11. Water Resources believes that the replacement of the remaining 71 meters can be accomplished on or before March 7, 2022, 45 days from January 21, 2022, the current deadline established pursuant to Ordering Paragraph No. 1 of the Commission's *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation*.

12. A 45-day extension of the current deadline for replacement of meters in Rocky River Plantation Subdivision is reasonable considering the delays experienced that were beyond the control of Water Resources, as detailed herein.

WHEREFORE, Water Resources respectfully moves the Commission to grant a 45-day extension of the deadline for the replacement of meters in the Rocky River Plantation Subdivision, setting back the current January 21, 2022, deadline and establishing March 7, 2022, as the extended deadline for compliance with the requirements of Ordering Paragraph No. 1 of the Commission's *Order Ruling on Motion for Clarification, Holding Complaint in Abeyance, and Requiring Public Staff Investigation*.

Respectfully submitted this 19th day of January, 2022.

/s/ Patrick Buffkin
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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 Complainant Lenny Devitto, and upon the Public Staff.

This the 19th day of January, 2022.

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