## STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. W-1305, Sub 12

In the Matter of
Application by Pluris Hampstead, LLC, )
5950 Berkshire Lane, Suite 800, Dallas, )
Texas, 75225 for Authority to Increase )
Rates for Sewer Utility Service in All of Its )
Service Areas in Pender County, North )
Carolina )

JOINT MOTION FOR EXTENSION OF TIME

NOW COME Pluris Hampstead, LLC and the Public Staff, through their undersigned counsel, and jointly move the Commission to extend the time for Pluris to file its rebuttal testimony in this docket up to any including August 21, 2020.

In support of this Joint Motion, Movants show the Commission as follows:

## BACKGROUND

- 1. On January 22, 2020, Pluris Hampstead, LLC ("Pluris"), filed an application with the Commission seeking authority to increase its rates for providing sewer utility service in all of its service areas in Pender County, North Carolina. Pluris serves approximately 524 residential flat rate sewer customers and 58 metered commercial sewer customers in Pender County, North Carolina.
- 2. On February 17, 2020, the Commission issued an Order Establishing General Rate Case and Suspending Rates. On March 18, 2020, the Commission issued an Order Scheduling Hearings, Establishing Discovery Guidelines, and Requiring Customer Notice.
- 3. On April 15, 2020, Pluris filed an Update to Operating Expenses and Rate Base.

- 4. On June 2, 2020, the Commission issued an Order Cancelling the Public Witness Hearing scheduled in the Commission's March 18, 2020 Order.
- 5. On June 23, 2020, the Public Staff filed a Motion for Extension of Time requesting that the Commission grant an extension until July 14, 2020, for the Public Staff to file its direct testimony and exhibits, and (2) granting an equivalent extension to July 31, 2020, for Pluris to file its rebuttal testimony and exhibits. On June 25, 2020, the Commission issued its Order granting the Public Staff's Motion for Extension of Time.
- 6. On July 1, 2020, the Commission issued its Order rescheduling the Public Witness Hearing for to begin at 7:00 p.m., on Monday, August 17, 2020, and to be held remotely via WebEx. That Order also scheduled a hearing for September 8, 2020, for the sole purpose of receiving expert witness testimony from Pluris, the Public Staff, and any other parties of record.
- 7. On July 14, 2020, the Public Staff filed direct testimony of Witnesses Casselberry, Li, and Craig.
- 8. Pluris and the Public Staff have begun discussions regarding potential agreement on disputed issues in this docket.
- 9. Allowing Pluris to delay filing its rebuttal testimony until four days after the public hearing will allow Pluris to address any significant issues raised by customers testifying at that hearing. The requested delay will also allow Pluris and the Public Staff to further pursue discussions regarding potential agreement resolving disputed issues.

WHEREFORE, based on the foregoing, the Movants jointly request an extension of time for Pluris to file its rebuttal testimony, up to and including August 21, 2020.

Respectfully submitted, this the 29th day of July, 2020.

BURNS, DAY & PRESNELL, P.A.

By:

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**Electronically submitted** 

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing document, has been served on all counsel of record for all parties in this docket, if any, and the Public Staff by either depositing same in a depository of the United States Postal Service, first-class postage prepaid and mailed by the means specified below, or by electronic delivery.

This the 29th day of July, 2020.

Daniel C. Higglins

Attorney for Pluris Hampstead, LLC