

SANFORD LAW OFFICE, PLLC

Jo Anne Sanford, Attorney at Law

August 6, 2019

Ms. Shonta Dunston, Deputy Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Via Electronic Delivery

Re: Aqua North Carolina, Inc.
Docket Nos. W-218, Subs 497 and 497A
Request for Extension of Time to File Reply Comments Concerning
AMR Technology Deployment, Originally Required by Ordering
Paragraph Nos. 26 and 27 of the Commission's December 18, 2018
Order in Docket No. W-218, Sub 497

Dear Ms. Dunston:

On June 18, 2019, Aqua North Carolina, Inc. ("Aqua" or "Company") filed the Affidavit of Lisa Gresehover, National Metrology Manager, Aqua America, Inc., which addressed the requirement set forth in Ordering Paragraph No. 27 of the Commission's Rate Case Order in Docket No. W-218, Sub 497 concerning the benefits and status of AMR technology deployment. Affiant Gresehover also stated that, as required by Ordering Paragraph No. 26, Aqua will notify the Commission at such time as the Company determines that it will be in a position to share the 40-day read history collected by its AMR technology with its AMR-metered customers, including a description of how such information will be provided to customers.

On June 27, 2019, the Commission entered an *Order Allowing Comments* in Docket No. W-218, Sub 497, specifying that, on or before Friday, July 26, 2019, interested parties were allowed to file comments regarding Aqua's response to Ordering Paragraph Nos. 26 and 27 of the Commission's December 18, 2018 Order and that, on or before Friday, August 9, 2019, Aqua was allowed to file reply comments.

On July 26, 2019, the Public Staff filed 22 pages of comments; no other party filed. In its comments, the Public Staff noted that, as of the time of its filing, Aqua had not provided responses to Items 8, 10, 11, and 12 of the Public Staff's July 9, 2019 Legal Data Request No. 1. For that reason, the Public Staff stated that it reserved the right to file supplemental comments after evaluating Aqua's responses to Items 8, 10, 11, and 12. The Company's responses to those four data request items were provided to the Public Staff on July 26, 2019. To date, the Public Staff has not filed any supplemental comments.

Upon review of the Public Staff's comments, in consideration of the Public Staff's reservation of an opportunity to file supplemental comments regarding Items 8, 10, 11, and 12 of its Legal Date Request No. 1, and in light of the unavailability of key Aqua personnel this week, Aqua requires additional time to prepare its Reply Comments, which are currently due on Friday, August 9, 2019. In the interest of judicial economy, Aqua hereby respectfully requests that the Commission require the Public Staff to file any supplemental comments regarding the four Data Request Items in question no later than Tuesday, August 13, 2019, and grant the Company an extension of time until Wednesday, August 21, 2019, to make its responsive filing.

This request is also necessitated by the press of other matters now being addressed by the Company in the normal course of its business and the need for careful review and evaluation of the lengthy comments filed by the Public Staff.

Aqua has contacted the other parties to this case (the Public Staff, the North Carolina Attorney General, and Intervenor Mr. Eric Galamb) and is authorized to state that none of those parties object to the request herein.

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

/s/Jo Anne Sanford

State Bar No. 6831

Attorney for Aqua North Carolina, Inc

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **Request for Extension of Time to File Reply Comments Concerning AMR Technology Development, Originally Required by Ordering Paragraph Nos. 26 and 27 of the Commission's December 18, 2018 Order in Docket No. W-218, Sub 497**, filed in Docket Nos. W-218, Subs 497 and 497A, on all parties of record either by first class mail, postage prepaid or by electronic delivery to those parties indicating assent to same.

This the 6th day of August 2019.

By: **/s/Jo Anne Sanford**

State Bar No. 6831
Sanford Law Office, PLLC
P.O. Box 28085
Raleigh, North Carolina 27611-8085
Telephone: 919-210-4900
sanford@sanfordlawoffice.com
Attorney for Aqua North Carolina, Inc.