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Admitted in: North Carolina

March 14, 2024

Ms. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, North Carolina

**Re: Application by Red Bird Utility Operating Company, LLC and A&D Water Services, Inc. for Transfer of Public Utility Franchise and for Approval of Rates**  
**Docket No. W-1049, Sub 25**  
**Docket No. W-1328, Sub 2**

Dear Ms. Dunston:

Enclosed please find a Motion for Extension of Time to File Rebuttal Testimony on behalf of Red Bird Utility Operating Company, LLC.

Please contact me if you or the Commission have any questions regarding this filing.

Best regards,

/s/ Mindy L. McGrath  
Mindy L. McGrath

Enclosure

c: Parties of Record w/ Encl.

**CERTIFICATE OF SERVICE****DOCKET NO. W-1049, SUB 25****DOCKET NO. W-1328, SUB 2**

I hereby certify that a copy of Red Bird Utility Operating Company, LLC's Motion for Extension of Time to File Rebuttal Testimony was served electronically or by depositing a copy of the same in the United States Mail, first class postage prepaid, at the addresses contained in the official service lists in these proceedings.

This the 14th day of March 2024.

**RED BIRD UTILITY OPERATING COMPANY, LLC**

/s/ Mindy McGrath

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**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. W-1328, SUB 2  
DOCKET NO. W-1049, SUB 25

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Application of A&D Water Services Inc. and	)	
Red Bird Utility Operating Company, LLC,	)	MOTION FOR EXTENSION OF TIME
d/b/a Red Bird Water for Transfer of Public	)	TO FILE REBUTTAL TESTIMONY
Utility Franchise and for Approval of Rates	)	
	)	

NOW COMES Red Bird Utility Operating Company, LLC (Red Bird or the Company), and respectfully moves the North Carolina Utilities Commission (Commission) to extend the time for Red Bird to file its prefiled Rebuttal Testimony to Tuesday, March 19, 2024. In support of this motion, Red Bird shows the following:

1. On October 9, 2020, A&D Water Services Inc. and Red Bird filed with the Commission a joint Application for Transfer of Public Utility Franchise and for Approval of Rates (Application) seeking authority to transfer the water and wastewater utility systems and public utility franchise serving the Buffalo Meadows, Camelot, Cinnamon Woods, High Vista, Hunters Glen, Kirk Glen, Mountain Valley, Rolling Oaks Estates, Sapphire Lakes, Sherwood Forest, Skyview Park, and White Oak Village subdivisions, in Ashe, Henderson, Buncombe, Transylvania and Gaston Counties, North Carolina. Red Bird filed with the Commission supplemental and additional materials in support of the Application on October 20, 2020, July 2, 2022, October 8, 2022, October 11, 2022, December 15, 2022, June 14, 2023, and December 12, 2023.

2. On January 2, 2024, the Commission issued its Order Finding Application Complete and Requiring the Public Staff to Provide Specific Application Data. The Public Staff filed the requested data on January 9, 2024.
3. On January 23, 2024, the Commission issued its Order Scheduling Hearings, Establishing Discovery Guidelines, and Requiring Customer Notice (Scheduling Order). The Scheduling Order provides that Red Bird's prefiled Rebuttal Testimony shall be filed on or before Friday, March 15, 2024.
4. Subsequent to the filing of Red Bird's Application in this docket, the parties engaged in substantial discovery regarding the matters addressed in the Application, supplemental and additional materials filed in support of the Application.
5. Since the filing of Red Bird's prefiled testimony and exhibits, on February 7, 2024, and the Public Staff's prefiled testimony and exhibits on March 6, 2024, the parties have conducted additional discovery. The parties have engaged in settlement discussions to resolve certain issues in dispute in this docket, and Red Bird believes that the additional time to file its rebuttal testimony will allow the parties the opportunity to resolve these issues.
6. Therefore, Red Bird respectfully requests and moves that the Commission extend the deadline for the filing of Red Bird's rebuttal testimony to Tuesday, March 19, 2024.
7. Red Bird has reached out to the parties of record in these dockets and received no objection to the filing of this Motion.

Respectfully submitted this 14th day of March, 2024.

Red Bird Utility Operating Company, LLC

/s/ Mindy McGrath

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