

SANFORD LAW OFFICE, PLLC

Jo Anne Sanford, Attorney at Law

November 15, 2022

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

Via Electronic Delivery

Re: Docket No. W-354, Sub 414
Carolina Water Service, Inc. of North Carolina
Formal Complaint of Don Calhoun
Request for Extension of Time to File Response to Formal
Complaint

Dear Ms. Dunston:

On November 7, 2022, Mr. Don Calhoun ("Complainant") filed a formal complaint in this docket against Carolina Water Service, Inc. of North Carolina ("CWSNC" or "Company"). On November 8, 2022, the Commission entered an *Order Serving Complaint* in this docket whereby CWSNC was "...directed to either satisfy the demands of Complainant or to file an answer with the Commission on or before November 18, 2022...."

The undersigned counsel notes that, as of the time of preparation of this filing, the above-referenced Order is not reflected in the docket system. Counsel learned of the existence of such Order during a telephone call with co-counsel Robert Bennink on Sunday, November 13th, when Mr. Bennink reported that he had received a copy of the referenced Order through the United States Postal Service on Saturday, November 12th. Even had undersigned counsel received notice of the Order immediately, it would still be necessary to request this extension of time to respond because of the unusual facts of this case.

Counsel is advised by representatives of CWSNC that this complaint matter is complex and will require significant time to research and properly respond. More specifically, the nature of the Company's interactions and work with Mr. Calhoun involve multiple staff members, multiple phone conversations

and property visits, numerous equipment changes, equipment testing, and data gathering. It will take time to compile and summarize all the relevant information to help ensure a thorough record in this case.

Accordingly, the Company requests an extension of time until Friday, December 16, 2022, to file its answer to the Calhoun formal complaint. In the interim, CWSNC assures the Commission that the Complainant's water utility service will not be terminated as a result of non-payment of any charges in dispute in this complaint proceeding, unless and until further order by the Commission. Furthermore, the Company represents that it will make a good faith effort to file an Answer prior to December 16, 2022, if circumstances so permit.

I hereby certify that a copy of this request for extension of time has been served on the Complainant.

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 Carolina Water Service,
Inc. of North Carolina

c: Don Calhoun, Complainant
Lucy Edmondson, Chief Counsel, Public Staff
Gina Holt, Manager, Legal Division, Natural Gas, Water, Sewer,
Telephone, & Transportation Sections, Public Staff
Charles Junis, Water and Sewer Division Director, Public Staff