

SANFORD LAW OFFICE, PLLC

Jo Anne Sanford, Attorney at Law

November 15, 2019

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

Via Electronic Delivery

Re: Docket Nos. W-354, Subs 363, 364, and 365
REPORTING REQUIREMENT DOCKET
Carolina Water Service, Inc. of North Carolina
Request for Order Consolidating Dockets

Dear Ms. Campbell:

On January 17, 2019, in Docket No. W-354, Sub 363, Carolina Water Service, Inc. of North Carolina (“CWSNC” or “Company”) filed a Petition for an Accounting Order to Defer Unplanned Incremental Hurricane Florence Storm Damage Expenses, Capital Investments, and Revenue Loss (Petition). By its Petition, CWSNC seeks an accounting order authorizing it to establish a regulatory asset and defer until the Company’s next general rate case, the Hurricane Florence-related impacts, including: (1) operations and maintenance (“O&M”) costs; (2) depreciation expense due to its capital investments incurred in connection with the damage to the Company’s water and wastewater systems; and (3) lost revenues.

On May 24, 2019, in Docket No. W-354, Sub 364, CWSNC filed a 30-day notice of intent to file an application for a general rate case pursuant to Commission Rule R1-17(a) of the Rules of Practice and Procedure of the Commission.

On June 6, 2019, the Commission, on its own motion, entered an *Order Consolidating Dockets* in the Sub 363 and Sub 364 proceedings, finding “...good cause to consolidate these dockets and address the issues in dispute concerning CWSNC’s request to defer Hurricane Florence-related impacts, including O&M expenses, depreciation expense resulting from capital investments incurred in

connection with the damage to the Company's water and wastewater systems, and lost revenues in CWSNC's general rate case, expected to be filed by June 24, 2019."

CWSNC subsequently filed an application for a general rate case on June 28, 2019. On that same day, in Docket No. W-354, Sub 365, CWSNC also filed a Petition for an Accounting Order to Defer Post-In-Service Depreciation and Financing Costs Relating to Major New Projects. In its Sub 365 Petition, CWSNC described the four major new projects for which the Company is requesting authority to defer for inclusion in the Sub 364 rate case the incremental post-in-service depreciation expense and financing costs. They are, specifically: (1) Connetsee Falls wastewater treatment plant ("WWTP") in Buncombe County; (2) Nags Head WWTP in Dare County; (3) Fairfield Mountain automated meter reading ("AMR") meters installed in Transylvania County; and (4) Connetsee Falls AMR meters installed in Buncombe County.

The Sub 365 docket, unlike the Sub 363 docket, has, to date, not been formally consolidated with the Sub 364 rate case, although both the Company and the Public Staff have treated and addressed the Sub 365 issues in testimony as being subject to decision by the Commission in the Sub 364 rate case.

Consistent with the Commission's procedure in terms of consolidating the Sub 363 and Sub 364 dockets, CWSNC hereby requests that the Commission enter an Order consolidating the three dockets in question (Subs 363, 364, and 365) for purposes of hearing and decision.

CWSNC is authorized to state that the Public Staff supports this request for consolidation of the Sub 363, Sub 364, and Sub 365 dockets and that the Corolla Light Community Association, Inc. does not oppose the request.

Sincerely,

Electronically Submitted
/s/Jo Anne Sanford
State Bar No. 6831

Attorney for Carolina Water Service,
Inc. of North Carolina

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing **Request for Order Consolidating Dockets**, filed by Carolina Water Service, Inc. of North Carolina in Docket Nos. W-354, Subs 363, 364, and 365, on all parties of record in those proceedings, in accordance with North Carolina Utilities Commission Rule R1-39, either by: United States mail, first class postage pre-paid; by hand delivery; or by means of electronic delivery upon agreement of the receiving party.

This the 15th day of November 2019.

Electronically Submitted
/s/Jo Anne Sanford

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