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August 22, 2019

Ms. Janice Fulmore Interim Chief Clerk North Carolina Utilities Commission 430 N. Salisbury Street Raleigh, NC 27603

RE: DOCKET NOS. W-1300, SUB 55, AND W-1320, SUB 0

Application for Transfer of Public Utility Franchise for the Briar Chapel Subdivision and for Approval of Rates from Old North State Water Company, LLC to ONSWC - Chatham North, LLC

DOCKET NOS. W-661, SUB 9, AND W-1320, SUB 2
Application for Transfer of Public Utility Franchise from Finch Creations d/b/a
Fearrington Utilities to ONSWC - Chatham North, LLC

Dear Ms. Fulmore:

On behalf of the *ONSWC - Chatham North*, *LLC* ("ONSWC"), we hereby submit **ONSWC's** Motion to Consolidate Dockets in the above-referenced docket.

If you have any questions or comments regarding this filing, please do not hesitate to call me.

Thank you in advance for your assistance.

Sincerely,

/s/ Karen M. Kemerait

Karen M. Kemerait

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STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NOS. W-1300, Sub 55, AND W-1320, SUB 0 DOCKET NOS. W-661, SUB 9, AND W-1320, SUB 2

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In Re:

DOCKET NOS. W-1300, SUB 55, AND W-1320, SUB 0
Application for Transfer of Public Utility Franchise for the Briar Chapel Subdivision and for Approval of Rates from Old North State Water Company, LLC to ONSWC - Chatham North, LLC

DOCKET NOS. W-661, SUB 9, AND W-1320, SUB 2 Application for Transfer of Public Utility Franchise from Finch Creations d/b/a Fearrington Utilities to ONSWC -Chatham North, LLC MOTION TO CONSOLIDATE DOCKETS

MOTION TO CONSOLIDATE DOCKET NOS. W-1300, SUB 55, W-1320, SUB 0, W-661, SUB 9, AND W-1320, SUB 2

NOW COMES ONSWC - Chatham North, LLC ("ONSWC - Chatham North") and respectfully moves the North Carolina Utilities Commission ("the Commission") to consolidate the above-referenced dockets into a single proceeding. The dockets involve two Applications for Transfer of Public Utility Franchise and for Approval of Rates, and consolidation of the dockets will allow for the expeditious resolution of the applications.

In support of this Motion, ONSWC – Chatham North shows the Commission the following:

- 1. On March 14, 2019, in Docket Nos. W-1300, Sub 55, and W-1320, Sub 0, ONSWC Chatham North filed an Application for Transfer of the Public Utility

 Franchise of Briar Chapel from Old North State Water Company, LLC to ONSWC –

 Chatham North. In the Application, ONSWC Chatham North has not proposed changing the current wastewater rates, and has proposed increasing the connection fees from \$1,500 per REU to \$4,000 per REU.
- 2. On August 5, 2019, in Docket Nos. W-661, Sub 9, and W-1320, Sub 2, ONSWC Chatham North filed an Application for Transfer of the Public Utility

 Franchise of Fitch Creations d/b/a Fearrington Utilities to ONSWC Chatham North. In the Application, ONSWC Chatham North has not proposed changing the current wastewater rates or the connection fees.
- 3. Once the Briar Chapel franchise and the Fearrington franchise are transferred to ONSWC Chatham North, they will be part of a combined and consolidated wastewater system owned by ONSWC Chatham North in Chatham County. Therefore, the matters in the dockets are substantially related.
- 4. Because the Commission's consideration of these applications involve common questions of law and fact, consolidation of the dockets would save the Commission valuable time and resources.

WHEREFORE, for the foregoing reasons, ONSWC - Chatham North respectfully requests that the Commission grant this Motion to Consolidate and issue an order consolidating the dockets.

Respectfully submitted this 22nd day of August, 2019.

Fox Rothschild LLP

Karen M. Kemerait.

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Counsel for ONSWC - Chatham North, LLC

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served the foregoing MOTION TO CONSOLIDATE of ONSWC - Chatham North, LLC upon all parties of record by electronic mail.

This 22nd day of August, 2019.

Karen M. Kemerait

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