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February 3, 2020

Ms. Kimberley A. Campbell Chief Clerk North Carolina Utilities Commission 430 N. Salisbury Street Raleigh, NC 27603

RE: Report Responding to Testimony of the Briar Chapel and Fearrington Village Customers at January 14 hearing;

In the Matter of: Application of ONSWC – Chatham North, LLC and Old North State Water Company, LLC, Docket Nos. W-1320, Sub 0; W-1300, Sub 55 Docket Nos. W-1320, Sub 2; W-661, Sub 9

Dear Ms. Campbell:

On behalf of Old North State Water Company, LLC ("ONSWC"), we submit the attached report in response to the testimony provided by customers testifying at the January 14, 2020 public hearing, in compliance with Ordering Paragraph 8 of the North Carolina Utilities Commission's ("Commission") Order issued in the above-referenced dockets on October 14, 2019.

If you have any questions or comments regarding this filing, please do not hesitate to call me. Thank you in advance for your assistance.

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Enclosure

cc: All Parties of Record

Report Responding to the Testimony of the Briar Chapel and Fearrington Village Customers

Old North State Water Company, LLC ("ONSWC") presents this report to respond to the testimony and concerns of the Briar Chapel customers and the Fearrington Village customer in compliance with Ordering Paragraph 8 of the North Carolina Utilities Commission's ("Commission") *Order Consolidating Dockets, Scheduling Hearings, and Requiring Public Notice* issued on October 14, 2019 and as represented at the customer hearing.

I. Background

As background, wastewater service in the Briar Chapel Subdivision ("Briar Chapel") generally begins at the edge of the right-of-way for the individual residences or commercial establishments¹, and continues through the wastewater collection system, wastewater treatment plant, reclaimed water holding ponds, and reclaimed water irrigation system. One of the unique features of the Briar Chapel reclaimed water irrigation system is the level of integration of the system within the Briar Chapel community. The spray irrigation system irrigates wooded areas, common areas, ball fields, parks, and in some cases residents' yards.

II. Customer Concerns

A review of the testimony Briar Chapel customers shows that their concerns can be organized within following categories, which serve are the organization of this report:

Asset Classification	Issue Categorization
Construction	Pipeline Construction Schedule
	Pipeline Construction Clearing
	Pipeline Construction Compliance
Collection System	Sanitary Sewer Overflow
Wastewater Treatment Plant	WWTP Odors
	WWTP Compliance
	WWTP Noise
Reckimed Water Irrigation	Irrigation Odors
	Customer Service
	Irrigation System Operation
Other	Non-irrigation system customer service
	Miscellaneous

^{*} A complete list of miscellaneous concerns are listed below.

¹ However, there are some instances in which wastewater service in Briar Chapel begins at the grinder pumps located near the foundation of the homes.

A. Construction

- 1. <u>Construction Schedule</u> As mentioned at the homeowner workshops in the Fall, the interconnection project and the pipeline work is behind schedule. While use of a different contractor was contemplated, ONSWC concluded that a change of contractors was not in the best interest of the Briar Chapel residents as it would only cause additional delays. Therefore, ONSWC decided to continue to work with that contractor to complete this project and address concerns, since this part of their scope of work is nearing completion. The schedule for construction for the work still to be done in the next few weeks and months was directly impacted by the issues related to construction compliance discussed below.
- 2. <u>Construction Clearing</u> ONSWC acknowledges that a construction contractor inadvertently disturbed areas, including riparian areas, outside of the approved limits of construction. In response to this issue, ONSWC required the contractor to restore, at no cost to ONSWC or to the Briar Chapel HOA, the riparian areas disturbed by the contractor and pay for additional disturbed area acreage under the sedimentation and erosion control permit. In addition, in response to this mistake and other concerns over vegetation and tree, ONSWC offered the Briar Chapel Community Association ("HOA") \$40,000 for planting of vegetative screening and future maintenance of trees. This offer is discussed in more detail below.
- 3. <u>Construction Compliance</u> The penalty mentioned at the hearing has been paid and will be deducted from the contractor's fee. On January 8, 2020, Chatham County officials conducted a site inspection regarding compliance with the erosion control plan. The contractor is aware of the problems (and has committed) to doing all maintenance requirements noted during that meeting (e.g., rills that need re-seeding). The contractor has confirmed that it will be inspecting and replacing any of the re-vegetation that does not survive the winter per remediation plans it agreed to with the County. Additional work and planting will be done as soon as practicable when the weather and soils are dryer and the growing season begins. ONSWC has worked, and will continue to work, with Chatham County, the HOA and the contractor to make sure that the contractor completes remediation and revegetation work.

B. Collection System

1. <u>Sanitary Sewer Overflows</u> – As background, ONSWC acquired this station and lines in 2014 from Briar Chapel Utilities. In operating the system, ONSWC identified design issues on the force main line where previous breaks had occurred, and we completed an initial upgrade to this line in 2018. In 2018, there was one break, which occurred during the period ONSWC was completing the work to address the items identified previously.

In early 2019, the line began experiencing additional issues. ONSWC again initiated an investigation by putting pressure data loggers on the system. ONSWC learned that pressure waves in the line were likely causing the line to break. Then, ONSWC retained the services of a transient pressure wave specialist to study the results of the extensive pressure monitoring and modeling of this force main line near Great Ridge Parkway. The modeling indicated that water column separation caused negative pressure which PVC pipe cannot withstand. As a result, the

force main line near Great Ridge Parkway had three (3) additional air relief valves installed during the last week of September 2019.

Now that this installation is complete, ONSWC has performed field observations of the areas that were previously presenting evidence of these pressure waves. Those areas are physically walked and inspected more frequently than required by the permit, and no problems have been observed since these latest repairs.

In the same vicinity of the force main breaks, there were two Sanitary Sewer Overflows (SSOs) related to electrical control failures at Lift Station A. The SSOs resulted from overflows at a manhole upstream from Lift Station A. As a result, we have (1) lowered the Lift Station's high-water alarm float to activate the dialer as soon as possible when the pumps do not come on so that the Operator will have sufficient time to respond, (2) begun a project to convert the existing telemetry system to full-time SCADA monitoring, and (3) assessed potential electrical issues in the Lift Station control panel.

These measures should address the cause of those overflows and prevent them from occurring in the future.

C. Wastewater Treatment Plant

1. <u>WWTP Odors.</u> ONSWC is committed to reducing and managing odors from the wastewater treatment plant to the extent practicable and has taken numerous steps to address this issue. As practical matter, the Briar Chapel wastewater treatment plant has the potential to release odors during various operational or maintenance circumstances. Odors are most prominent when solids and screening removal activities are being conducted. In 2019, we received an increased number of service calls related to odors from the wastewater facility. Since ONSWC acquired the Briar Chapel wastewater treatment facility from Briar Chapel Utilities, LLC in 2015, ONSWC has initiated several measures to mitigate odors in both the collection system and the wastewater treatment plant. Over time, ONSWC equipped the lift stations within the Briar Chapel wastewater system with odor control chemical feed systems so that all currently operating lift stations now include odor control measures. Also, Bioxide, a calcium nitrate solution, is injected into the wastewater at each lift station in order to inhibit the formation of hydrogen sulfide and its odor. ONSWC annually spends approximately \$100,000 in Bioxide at Briar Chapel.

Moreover, in recent years, ONSWC worked with the Briar Chapel developer to cover the equalization basin and headworks at the wastewater treatment plant and to install an air scrubbing system. The air in these areas is scrubbed using carbon filtration prior to being released to the atmosphere. The investment by ONSWC required to complete this project was approximately \$350,000.

The increased concerns about odor from the Briar Chapel wastewater treatment facility in 2019 was due to an unfortunate and unusual confluence of circumstances involving the carbon scrubbing at the wastewater treatment facility. In early summer 2019, we evaluated the remaining life of the air scrubbers, and found that the filtering media was nearing the end of its useful life and needed to be replaced, which normally takes about one week to complete.

However, after replacing the filtering media and attempting to put the system back on-line, the air pump would not restart and had to be replaced. A new pump had to be ordered with a lead time of four to six weeks. We requested a rush order and were able to get the pump installed within three weeks; but this waiting period for the new pump resulted in about a one-month period where the air scrubbing system at the wastewater treatment plant was out of service. Also, because this occurred during the summer, the higher ambient air temperatures exacerbated the odors.

While we believe that the odor complaints are attributed to this period when the air scrubbers were offline, we want to better understand odor generation during periods when staff are not physically present at the wastewater treatment facility. Thus, in January 2020, we installed hydrogen sulfide monitors on the fence at the wastewater treatment plant. We intend to use this data to better understand odor generation at the wastewater treatment facility with the goal of keeping odor generation to a minimum.

In addition, ONSWC wishes to point out that the planned expansion and upgrade of the existing Briar Chapel treatment facility to a MBR facility will include additional odor control measures designed to minimize the impact of the MBR facility to the Briar Chapel community.

2. <u>Wastewater Treatment Plant Compliance</u>. The Briar Chapel wastewater treatment plant has been in operation for close to fifteen years and has an excellent record of compliance with the North Carolina Department of Environmental Quality ("NCDEQ"). However, in 2019, the NCDEQ inspector did note a few items regarding the wastewater treatment plant. ONSWC corrected those issues within one day and then requested a follow-up inspection. NCDEQ conducted the follow-up inspection in January 2020.

We certainly understand that customers have experienced odors as discussed above, but statements that the odor is caused by inadequately or partially treated wastewater are inaccurate. Pursuant to our permit, the effluent is regularly tested and meets all applicable regulatory standards. In addition, we have compared the effluent testing data from the Briar Chapel wastewater facility with that of other facilities in and around the area (e.g. Town of Pittsboro, etc.). Based on our review, the quality of the treatment received by the Briar Chapel facility equals or exceeds that of these facilities.

3. <u>Wastewater Treatment Plant Noise</u>. The public hearing was the first time that we have heard of concerns regarding noise at the wastewater treatment facility. In response, we will be conducting noise measurements at the property line of the Briar Chapel facility. In general, the decibel levels typical for operations of a wastewater treatment plant are well below all applicable noise level regulations.

D. Wastewater Irrigation System

1. <u>General</u>. The Briar Chapel wastewater irrigation system is operated during late spring, summer, and early fall. As such, it is typical for the spray irrigation system to be shut down from November through March to avoid oversaturation of wet soils.

2. <u>Irrigation System Odors</u>. The wastewater irrigation system has been in operation for approximately ten years. Over this period, to our knowledge, there have not been significant odors from the irrigation system. (Please refer to the service order summary described below and attached as <u>Exhibit A</u>.) However, there was a significant increase in odor-related complaints during the summer 2019 irrigation season, and ONSWC immediately evaluated the reason for the increase in odors. In reviewing the cause of these odors, ONSWC conducted a thorough review of the existing irrigation system, found that odor generation within the irrigation system is possible, and took measures to prevent this situation from occurring again.

The reclaimed water holding pond is 25-feet deep, and is often home to ducks, geese, and duckweed. We have reviewed effluent monitoring data and found that the wastewater treatment plant effluent does not appear to be a significant source of organic material, but that ducks, geese, and vegetation, such as duckweed, are potential sources of organic material. The organic material, coupled with anaerobic conditions at the bottom of the pond, can result in hydrogen sulfide generation. The intake for the irrigation system is located at the bottom of the pond, which creates the potential for the irrigation water to contain hydrogen sulfide (a source of odors).

Two accepted operational practices to address this problem are to chlorinate the reclaimed water prior to distribution and to flush the water in the piping delivering the reclaimed irrigation water. However, until recently, the flushing of water from reclaimed water irrigation systems was prohibited in the State of North Carolina, so ONSWC was not able to flush the water in the piping. There have been recent regulatory changes that now allows the flushing of reclaimed water irrigation systems as a deemed permitted activity. However, the Briar Chapel reclaimed water irrigation system is not equipped with blow-offs (since they would not have been necessary, or even useful at the time the system was constructed), which limits ONSWC's current ability to flush the water prior to initiating irrigation activities.

Unfortunately, when the Briar Chapel developer designed and constructed the reclaimed water irrigation system, it was not designed or equipped with chlorination. ONSWC noted this limitation as part of its investigation into the odor complaints.

To address odors in the irrigation system, ONSWC has initiated a project to install blow-offs and implement chlorination in the irrigation system. However, these measures cannot be installed without authorization from NCDEQ. ONSWC received approval from NCDEQ in January 2020. Installation of chlorination measures and the blow-offs is currently in process. These measures will be completed prior to start-up of the irrigation system for the 2020 irrigation season. We understand why the Briar Chapel residents might perceive that ONSWC was not being timely in responding to the odor problems in the irrigation system, but ONSWC is not permitted to modify the system without to obtaining prior authorization from NCDEQ.

The final circumstance that occurred last summer involved aeration of the reclaimed water ponds. The low dissolved oxygen in the bottom of lakes and ponds can also create conditions that promote the formation of hydrogen sulfide (rotten egg odor). The reclaimed ponds at Briar Chapel are equipped with aeration units (i.e. "bubblers") in order to help maintain

oxygen throughout the depth of the pond, thus, prohibiting the formation of hydrogen sulfide. This past summer, the aerations units in the primary pond closest to the plant malfunctioned and were out of service for several weeks. This resulted in insufficient oxygen being introduced into the pond resulting in the formation of hydrogen sulfide that was distributed throughout the community via the spray irrigation system. To prevent this situation from occurring again, additional back-up replacement bubblers have been purchased and can be installed, immediately, if necessary. Also, additional aeration measures have been procured and will be installed prior to this year's irrigation season. For instance, we will be installing an additional, completely redundant bubbler system prior to the upcoming irrigation season

3. Reclaimed Water Irrigation System - Customer Service. The Briar Chapel reclaimed water system is maintained by two, three-person crews, and these crews respond to customer service issues related to the spray irrigation system. We have reviewed customer call logs to assess each customer call, but are aware that customers do not always call Envirolink's customer service number when experiencing issues with the reclaimed water system. As noted in Ms. Colbert's testimony at the public hearing, customers often call the Briar Chapel HOA or the HOA maintenance staff directly. There are a number of methods currently in place to alert Briar Chapel customers to report customer services issues to Envirolink's customer service number. The Envirolink customer service number is located on each customer's monthly bill, is displayed on signs at each pump station with Briar Chapel, is listed on the Briar Chapel HOA website, Briarchapellife.com, has been conveyed in newsletter communications to the customers, and provided orally at Briar Chapel community meetings.

To further customer awareness, we will continue to educate and inform customers that they should contact Envirolink's customer service number so that we can be aware of all concerns and attempt to address them. Calls to the Briar Chapel HOA or directly to our technicians depends on the HOA and/or technician communicating the issue to customer service in order to generate a service order. Our technicians are instructed to accept any customer's call, but to request that the customer call customer service in the future. Also, we have requested that the HOA instruct customers to call our customer service number. Obviously, additional efforts and monitoring by ONSWC is warranted to continue to educate and inform customers so that we can better monitor service orders and respond as quickly as possible.

4. <u>Irrigation System Operation</u>. The Briar Chapel reclaimed water irrigation system is comprised of two holding ponds, a weather station, one pump station, distribution piping ranging in size from 18" to 2", 48 irrigation zones, and 7,500 irrigation nozzles. The system is controlled by a SCADA system that controls the start and stopping of each zone in accordance with a programmed irrigation schedule. The irrigation system is programmed to shut down when the site receives one-quarter-inch of rain, as measured by the weather station.

As previously mentioned, six full-time technicians inspect each zone and nozzle and complete repairs as required. Additional staff from other operations are available in the event additional resources are required. In light of concerns expressed during town hall meetings in the fall of 2019, Mr. Kenneth Harris has also been recently hired by Envirolink specifically to provide additional customer support for Briar Chapel.

The volume and duration of irrigation is based on an area's soil capacity. We know that the Briar Chapel grounds generally consist of poorly draining soils, and there are areas that may be subject to saturation from groundwater, stormwater, and irrigation water. To our knowledge, the following areas are the most susceptible to saturation:

- Area across from Pollard Middle School
- Great Meadows area
- Boulder Park area
- Briar Commons area

In addition to these areas, some of the Briar Chapel residents noted that irrigation has been sprayed on paved areas.

We agree that oversaturation and run-off of reclaimed irrigation should not occur. Our system is designed and operated to prevent oversaturation and run-off, and the system is monitored by the irrigation staff on a regular basis. Three factors, however, have impacted the irrigation spray areas and are being addressed:

- 1. Wind drift Wind can cause spray irrigation to drift onto paved and recreational areas. Some HOA recreational areas, including pickleball and tennis courts, were constructed by the developer or HOA within ONSWC spray irrigation easement areas and the nozzles are within inches of paved areas. ONSWC recognizes that, because it is a function of weather conditions, complete elimination of wind drift of some spray is difficult at best, impossible at worst. Consequently, ONSWC has turned off these irrigation zones next to the pickleball and tennis courts until a solution is implemented. In other areas, the circumference of the spray nozzles has been reduced to minimize wind drift. ONSWC is open to discussing protocols that would allow the spray irrigation system and the pickle ball courts to be co-located in this area, but prior to the public hearing, no such request had been received.
- 2. Malfunctioning irrigation nozzles- a computer motherboard for the irrigation operating system failed during the summer of 2018, which prevented the system from shutting off during rain events. This faulty motherboard was discovered during inspection and replaced and that problem should now be remedied.
- 3. Damaged irrigation nozzles- Irrigation nozzles may become damage during mowing or other events. The six full-time technicians inspect each nozzle every month for damage and proper operation. A service order is created for any damage or improper operation noted and the damage is remedied.

ONSWC will continue its efforts – using both technology and its employees as described above - to ensure that no areas are oversaturated because of improper irrigation.

ONSWC notes that it only irrigates from approximately mid-April until mid- to late-October. Any oversaturation this winter, as well as the sink holes referenced by some persons at the public

hearing, are not the result of irrigation, but rather from naturally occurring weather events and, potentially, improper, insufficient, or temporary drainage.

E. Additional Concerns or Issues

1. <u>Non-Irrigation Related Customer Service</u>. In response to the concerns raised during the public hearing, a review of customer calls and service orders was conducted. We could find no evidence of calls not being answered or subsequent service orders not being issued. As noted above, we will continue to encourage customers to call our customer service line, rather than calling the HOA, the HOA management company, or the irrigation contractor directly. However, since we are aware that this practice still continues, we are reaching out directly to those customers submitting testimony to determine the circumstance behind each occurrence.

We also conducted a review of completion times for service. On average, service orders from customers comprise approximately 30% of the total orders issued for the Briar Chapel wastewater treatment system, with work orders comprising the work amount of total orders. As a general rule, service orders are customer initiated, whereas work orders are internally initiated orders.

Service orders were reviewed from May 2014 through December 2019 (a 67-month period). A summary of this complete list is attached as <u>Exhibit A</u>. To aid in the review, service orders were categorized as Grinder Pumps, Stoppages, Noise, Irrigation, Leak Investigation, Odor, or Other. Because odors can be generated from multiple sources, we further divided odors based on the potential source of odors (*i.e.*, WWTP, Wastewater Irrigation System, Potable Water, Collection System, and Service Line). As noted above, calls regarding odor increased in 2019 from previous years for the wastewater treatment plant and the spray irrigation system.

2. Adequacy of Staffing: Our customers may not be aware of the resources that are both dedicated to Briar Chapel and available to the community at any time. On a daily basis, there are six individuals inspecting and operating the spray irrigation facilities and another two individuals monitoring lift stations and the wastewater treatment plant. In addition to these individuals, there are approximately 20 maintenance personnel available to Briar Chapel as needed. As noted, we have reviewed service order response times for Briar Chapel dating back to 2014 and noted that the vast majority of service orders are completed within the same day.

While it is accurate that the NCDEQ does not require staffing during evenings and weekends, ONSWC staff is present on-site at the Briar Chapel community six days per week, and on-call personnel are available on evenings and weekends. The Envirolink customer service line serving Briar Chapel customers is open 24-hours per day, 365 days per year.

3. <u>William Lamm's other responsibilities</u>. The data provided as testimony during the hearing was obtained from the North Carolina Division of Water Quality's database. Unfortunately, this database is not routinely updated, and the information does not accurately reflect Mr. William Lamm's actual, current responsibilities. It is the policy and practice of Envirolink to ensure that our staff is familiar with each system we operate and manage. Thus, every operator on staff is a back-up to other facilities. For example, Briar Chapel has one

Operator in Charge – William Lamm -- and also has 22 backup operators who are knowledgeable of and familiar with the Briar Chapel system. Thus, while Mr. Lamm is a backup to several facilities, this does not limit Mr. Lamm's ability to perform his primary responsibilities at Briar Chapel.

4. <u>Allegation that ONSWC operates in an adversarial manner with customers</u>. This statement was very concerning as it is never our intent to operate in an adversarial manner. We exist in order to serve our customers well and efficiently, and we take that responsibility very seriously. We undertake employee training that expressly emphasizes the importance of responsive customer service. It is always our intent to communicate in a cooperative manner and explain the reasons and situation when we are not able to fulfill a request or when issues arise. That being said, ONSWC is committed to improving relations and communications within the Briar Chapel community.

ONSWC is willing to conduct regular meetings open to all of its Briar Chapel customers about progress on the issues discussed in this report and to provide regular reports on that progress. It will continue its ongoing communications with the HOA and will welcome feedback and suggestions about its operations.

- 5. Property Values. ONSWC is committed to addressing concerns about the Briar Chapel wastewater treatment system and to avoid any concerns about impact to property values; however, ONSWC is not aware of any credible evidence that suggests that the operation of the wastewater treatment plant or the irrigation spray system has adversely affected property values. In fact, the community is still experiencing rapid growth and properties values within Briar Chapel are steadily increasing. According to data from the Multiple Listing Service, the total number of resales was up 17% from 124 re-sales in 2019, compared to 107 in 2018. The average price increased by 4% in 2019 from \$372,196 to \$387,830. Briar Chapel had a total of 299 home sales in 2019, including 175 new home sales.
- 6. Allegations of antibiotic resistant bacteria in wastewater / safety of irrigation effluent. The Briar Chapel wastewater facility disinfects the water using both chlorination and ultraviolet disinfection, as required by the regulatory permits for the facility. These methods of disinfection are effective methods of disinfection of all types of bacteria including antibiotic resistant bacteria. Furthermore, ONSWC conducts routine testing of the water to ensure compliance with all public health standards.

While not required, the idea of testing the irrigation water prior to disposal was mentioned during the hearing. ONSWC concurs with this recommendation and tested the reclaimed water entering the pond, the water leaving the pond, and the water in Pokeberry Creek upstream of the Briar Chapel community. This testing of the irrigation water indicates that the quality of the effluent was below detection limits for fecal coliform prior to entering the holding pond. The quality of the water entering the irrigation system from the pond was well below all applicable permit standards and a fraction of the naturally occurring quality of Pokeberry Creek. ONSWC intends to continue to conduct routine monitoring in order to ensure the water being irrigated meets all safety and health acceptable standards.

- 7. <u>Water quality within Jordan Lake Watershed.</u> Ensuring water quality within the Jordan Lake watershed and complying with the Jordan Lake Rules is a primary driver for this project. This project will not result in any additional nutrient loading in Jordan Lake, and will instead result in more reliable and better treatment of the water than is currently provided by the Fearrington Utility wastewater facility. In addition, the upgraded facility will produce a higher quality effluent for use within the Briar Chapel community.
- 8. Allegations that project does not benefit Briar Chapel. Again, we believe that there are multiple benefits for the Briar Chapel community from the project. This force main that was constructed will serve eastern areas within the Briar Chapel community, and the upgraded treatment will increase the quality of the effluent distributed within the community. The project will allow ONSWC to meet the future demands of the Briar Chapel community without constructing additional spray fields, and the larger customer base will help to mitigate rate pressures to increase rates to all customers in the future.
- 9. The HOA board meetings referenced by ONSWC were controlled by the developer. Although the developer held most of the votes on the Briar Chapel HOA board until recently, during each meeting that ONSWC attended and discussed these issues, most of the Board members in attendance were community residents.
- 10. Commitment to replace trees along pipeline corridor. This offer was a goodwill gesture offered by ONSWC to the HOA in response to pipeline construction and concerns over the removal of trees. While the utility easement permits ONSWC to construct the pipeline through this area, we were sensitive to customer concerns and impacts adjacent to the pipelines route. ONSWC requested two conditions on the payment: First, that our contribution be used for plantings both now and in the future. (We were aware that there were concerns about additional trees dying in the future, but it was our opinion this payment was more than sufficient to address future paintings.) Second, regarding the non-disparagement condition, ONSWC intended this to only apply regarding the tree clearing issue along the pipeline route and under no circumstances suggested that this was offered to limit individual customers from commenting on utility matters during public hearings.
- 11. <u>Impact of project on customer rates</u>. As noted in the Application, ONSWC is not requesting any adjustments to the rates for customers within the Briar Chapel community as part of this transaction.
- 12. ONSWC's corporate registration. ONSWC's 2018 and 2019 annual reports have been filed, and ONSWC has been administratively reinstated by the Secretary of State and is in good standing to do business in North Carolina.
- 13. Roles & Responsibilities ONSWC owns the wastewater system serving Briar Chapel and has outsourced day-to-day management of the facilities to two companies. Envirolink is responsible for customer service, billing and operation and maintenance of the collection system and wastewater treatment plant. Quality Landscape, Inc. is responsible for operation and maintenance of the reclaimed spray irrigation system.

14. <u>Odors from Water Faucets</u>. ONSWC does not own or operate the water system serving Briar Chapel. Water service is provided by Chatham County. However, on occasion we have received odor complaints related to water service.

ONSWC is aware that many of the measures that it has taken and discussed above will not be apparent until the start of the irrigation season later this spring. In addition, several more steps are currently in process and will be implemented over the next ninety days.

ONSWC intends to hold regular meetings open to all of its Briar Chapel customers to report on the progress of this work, to receive feedback and hear concerns from its customers, and to answer questions and improve communications. The NCUC Public Staff will be notified of these meetings and its representatives are encouraged to attend.

ONSWC will provide written reports to the North Carolina Utilities Commission, filed in these dockets, to report on these meetings and keep the Commission fully informed of the progress made on the items discussed above.



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