

**PUBLIC STAFF  
RESPONSE TO  
AQUA NORTH CAROLINA, INC.  
DATA REQUEST NO. 8 TO PUBLIC STAFF**

**DOCKET NO. W-218, SUB 526**

**DATE OF REQUEST: FRIDAY, MAY 29, 2020  
DATE OF RESPONSE: WEDNESDAY, JUNE 3, 2020**

☐

CONFIDENTIAL

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NOT CONFIDENTIAL

The individuals making the response and responsible for the subject matter addressed in herein are Windley Henry, Accounting Manager of the Water and Sewer/Communications Section of the Public Staff Accounting Division, and Charles Junis, Engineer with the Water, Sewer, and Telephone Division of the Public Staff.

**Subject of Data Request: Joint Testimony and Exhibits of Windley Henry and Charles Junis**

**Request:**

1. Page 7, lines 7-8 read "Ideally, the in service date will occur in the same month as the unitization date."
  - a. Is this ideal new since the Sub 274 rate case referenced later on that same page of testimony?
  - b. Are there reasons this is stated as an ideal rather than a rule?
    - i. If so, what factors might appropriately cause a delay in the unitization beyond the in-service date?
    - ii. Are these factors new considerations?
    - iii. Were there factors in the Sub 274 case that are no longer deemed worthy of consideration?

**Response:**

- a. No.
- b. Yes. The reason the Public Staff utilizes ideal instead of rule is because there are circumstances or factors that could legitimately delay a complete and accurate unitization after the in-service date.
  - i. Such factors include, but are not be limited to, receipt of accounts payable from vendors, invoicing disputes, and mechanical, structural, and/or efficacy issues that develop upon start-up.
  - ii. No.
  - iii. No.