

SANFORD LAW OFFICE, PLLC

Jo Anne Sanford, Attorney at Law

May 21, 2020

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

Via Electronic Delivery

Re: Carolina Water Service, Inc. of North Carolina ("CWSNC")
Docket No. W-354 Sub 364
Application by CWSNC for Authority to Adjust and Increase Rates
for Water and Sewer Utility Service in all Service Areas in North
Carolina
Motion for Extension of Time to File Report

Dear Ms. Campbell:

Attached please find a Motion for Extension of Time to file reports on
filtration systems, filed by CWSNC in the referenced docket.

As always, we thank you and your staff for your assistance; please feel
free to contact me if there are questions or if additional information is required.

Electronically Submitted

/s/Jo Anne Sanford
North Carolina State Bar No. 6831
Attorney for Carolina Water Service, Inc. of
North Carolina

c: Parties of Record

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-354, SUB 363
DOCKET NO. W-354, SUB 364
DOCKET NO. W-354, SUB 365

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-354, SUB 363)	
)	
In the Matter of)	
Application by Carolina Water Service, Inc. of North)	
Carolina, 4944 Parkway Plaza Boulevard, Suite 375,)	
Charlotte, North Carolina 28217, for an Accounting)	
Order to Defer Incremental Storm Damage Expenses)	
Incurred as a Result of Hurricane Florence)	
)	
DOCKET NO. W-354, SUB 364)	MOTION FOR EXTENSION
)	OF TIME TO FILE
In the Matter of)	ESTIMATES OF
Application by Carolina Water Service, Inc. of North)	FILTRATION COSTS
Carolina, 4944 Parkway Plaza Boulevard, Suite)	
375, Charlotte, North Carolina, 28217, for Authority)	
to Adjust and Increase Rates for Water and Sewer)	
Utility Service in All of its Service Areas in North)	
Carolina.)	
)	
DOCKET NO. W-354, SUB 365)	
)	
In the Matter of)	
Application by Carolina Water Service, Inc. of North)	
Carolina, 4944 Parkway Plaza Boulevard, Suite 375,)	
Charlotte, North Carolina, 28217, for Accounting)	
Order to Defer Post-In-Service Depreciation and)	
Financing Costs Related to Major New Projects That)	
Are or Will Be In-Service Prior to the Date of An Order)	
in Petitioner's Pending Base Rate Case)	
)	

NOW COMES CAROLINA WATER SERVICE, INC. OF NORTH CAROLINA (“CWSNC” or “Company”), by and through the undersigned counsel, and requests an extension of time to file estimates of the cost of central-system filtration, to treat for hardness in the source water, for the Bradfield Farms and Fairfield Harbour service areas. In support of this Motion, CWSNC respectfully shows the Commission the following:

1. After reviewing complaints about water quality and hardness from some of the customers in the Bradfield Farms and Fairfield Harbour service territories, Public Staff witness Gina Casselberry recommended in this rate case that CWSNC should provide an estimate of the cost of installing central water filter systems for both subdivisions. (*Tr. Vol. 8, pp. 102-103 re. Bradfield Farms and Tr. Vol. 8, pp. 109-110 re. Fairfield Harbour*)
2. Consistent with the Commission Order of March 31, 2020, CWSNC has been working on developing estimates for the costs of filtration systems in the Bradfield Farms and Fairfield Harbour Subdivisions.
3. The Commission ordered estimate development within 60 days of the date of the Order, which would be by May 30, 2020.
4. Due to complexities found in the water systems located in Fairfield Harbour and Bradfield Farms, CWSNC has requested technical assistance from Water Purification Consultants, Inc. of Winston Salem, NC (“WPC”) to evaluate the feasibility and associated cost of filtration systems. In addition, CWSNC restrictions related to COVID-19 have prevented timely entry by these consultants to begin system evaluations. WPC conducted an initial site visit in

Fairfield Harbour on May 14, 2020, and will be evaluating Bradfield Farms the week of May 25th. CWSNC expects to have recommendations from WPC by June 30, 2020, and submits that two months additional time, until July 31, 2020, is required to fully prepare and document the Company's response.

5. The Public Staff does not oppose this request.

WHEREFORE, CWSNC respectfully requests a two-month extension of time, until July 31, 2020, to file the required information.

Submitted this the 21st day of May 2020.

**ATTORNEY FOR CAROLINA WATER SERVICE,
INC. OF NORTH CAROLINA
Electronically Submitted**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **MOTION FOR EXTENSION OF TIME TO PROVIDE ESTIMATES OF FILTRATION COSTS**, filed by Carolina Water Service, Inc. of North Carolina in Docket Nos. W-354, Subs 363, 364, and 365 has been served on the Public Staff, North Carolina Utilities Commission, by hand delivery or electronic transmission to Gina Holt, Staff Attorney.

This the 21st day of May 2020.

**ATTORNEY FOR CAROLINA WATER SERVICE,
INC. OF NORTH CAROLINA
Electronically Submitted**

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