A P P E A R A N C E S:

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IDENTIFIED/ADMITTED

NORTH CAROLINA UTILITIES COMMISSION
APPEARANCE SLIP

DATE 11-9-19
DOCKET #: W 354 Sub 364
NAME OF ATTORNEY Jo Anne Sanford
TITLE
FIRM NAME Sanford Law Office
ADDRESS P.O. Box 28085
CITY Raleigh, NC
ZIP 27611

APPEARING FOR: Applicant CWSNC

APPLICANT ✓ COMPLAINANT _____ INTERVENOR _____
PROTESTANT _____ RESPONDENT _____ DEFENDANT _____

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NORTH CAROLINA UTILITIES COMMISSION
PUBLIC STAFF - APPEARANCE SLIP

DATE October 9, 2019 DOCKET #: W-354, Sub 364

PUBLIC STAFF MEMBER Gina Holt

ORDER FOR TRANSCRIPT OF TESTIMONY TO BE **EMAILED** TO THE PUBLIC STAFF - PLEASE INDICATE YOUR DIVISION AS WELL AS YOUR EMAIL ADDRESS BELOW:

ACCOUNTING _____
WATER _____
COMMUNICATIONS _____
ELECTRIC _____
GAS _____
TRANSPORTATION _____
ECONOMICS _____
LEGAL gina.holt@psncuc.nc.gov
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_____

_____

_____
Signature of Public Staff Member

Van Rens Exhibit 1

I/A

Woodhaven Property Owners Assn.

(Docket No. W-354, sub 364)

Sept. 29, 2019

Dear Sir, NCUC Commissioners and Public Staff,

Please note that James Hemphill, President of Woodhaven POA Inc. and Chuck van Rens Water Chair, Woodhaven POA Inc. will be present and testify at the Asheville public hearing at 7:00pm Oct 9th 2019.

Please see the enclosed letter, resolution and documents where Woodhaven POA, Inc highly objects to the 8.2% base rate increase and the 24.6% double digit usage water rate increases proposed by Carolina Water Service/Utilizes, Inc. to the NCUC. (Docket No. W-354, sub 364) We will be present at the public hearing in Asheville on Oct 9th to clearly make our point of view know.

Please note these comments on Carolina Water Service, which are resounding positive:

1. CWS regional mangers and staff have a positive history of responding to Woodhaven needs and issues. It is worth mentioning Stacy Adcock-CWS and previous manager, Gary Peacock-CWS.

2. In resolving a historic easement dispute(Smith property) and not destroying the green barrier between properties and putting Well #2 back online. we give special thanks to Bryce Mendenhall, VP of Operations, Thank you

However, we have a history of double digit increases and 50% of requested granted that smack of rubber stamping. Also we will present documentation highlighting that the ratio of public to private water cost in NC is way out of line compared with other states. The document included with this mailing shows NC the second highest in the nation. This is not a good thing. The laws and regulations governing private water rate increase are the culprit. They need to be adjusted to result in a reasonable level. Is it possible to make clear, with a short white paper, the exact methodology used by the public staff to evaluate rate increase proposals.

Highest regard,

Chuck van Rens

Woodhaven POA, Water Chairman

(Docket No. W-354, sub 364)

What can we do with CWS, NCUC and Public Staff? We are not convinced that the collective group is looking after our interest on rate increases.

Whereas:

1. Woodhaven POA and Carolina Water Service (CWS) customers are outraged at the 24.57% usage and the 8.2% base proposed water rate increases.
2. The frequency of increases(usually a 2 year cycle) is becoming shorter.
3. Double digit water rate increase by CWS/Utilities, Inc. and historic double digit rate increases are symptomatic of a process that lacks clarity in justification.
4. The complex laws, regulations, and processes of North Carolina Utilities Commission (NCUC) are not customer friendly and give a advantage to lawyer supported CWS/Utilities, Inc. in the rate justification process. We need a simple explanation of evaluation process and methods.
5. Historically, submitted signatures of residents, registering as high as 90% of Woodhaven POA members, do not appear in public record and seem to be ignored.
6. Woodhaven Base rate should be reduced-CWS pays no taxes on well property and the quality of the water requires far less that average treatment.
7. Lack of clarity around the ongoing implications of the 2017 The Tax Act to customer costs, credits and flowbacks.

Therefore, it is resolved that the corporation shall:

1. Seek to contact other customers of CWS/Utilities, Inc. and build a coalition of the concerned.
2. Undertake a campaign to inform and persuade local, regional, and state government officials of the problems with the laws, regulations, and processes of private water rate increase issues.
3. Will communicate a benchmark of public/private water rate increase comparisons as a ratio between states to keep NC's high ratio in line with the average ratio or even better.

Docket No. W-354, SUB 364

Woodhaven/ Pleasant Hill Sub-Divisons

Carolina Water Service Rate Increases - Proposed/Granted

Date of Increase	Base Increses requested	Base Increase Granted	requested increase granted		Cost/Gal increase requested	Cost/Gal increase granted	requested increase granted
Apr-05	36%	18%	50%		33%	19%	58%
Jul-07	24%	14%	58%		27%	14%	52%
Jan-09	24%	9%	38%		24%	9%	38%
Feb-11	28%	13%	48%		27%	12%	44%
Mar-14	23%	14%	61%		23%	12%	52%
Dec-15	23%	23%	100%		23%	18%	78%
Nov-17	20%	10%	50%		20%	20%	100%
19-Feb	15%	12.60%	84%		15%	-8%	-53%
2019/20	8.20%				24.60%		
Avg. Increase Granted			51%				53%

(Docket No. W-354, sub 364)

Water Bill Comparison Study Compiled by Food & Water Watch

Table 1. Comparison of Annual Household Water Bills of Public and Private Utilities By State(s)

State(s)	Annual Household Bill		Percent that Private Prices are Greater
	Municipal or Local Government Utility	Private or Investor Owned Utilities	
Alaska[3]	$441.84	$458.79	4%
Arizona[4]	$225.00	$329.40	46%
Arkansas[5]	$273.83	$344.68	26%
California[6]	$415.86	$500.42	20%
Connecticut[7]	$300.72	$398.13	32%
Delaware[8]	$256.20	$449.40	75%
Florida[9]	$300.96	$360.02	20%
Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, Ohio and Wisconsin[10]	$280.44	$318.72	14%
Illinois[11]	$240.84	$326.88	36%
Indiana[12]	$232.68	$318.81	37%
Iowa[13]	$219.84	$314.16	43%
Kentucky[14]	$316.07	$361.21	14%
Maryland[15]	$232.50	$381.00	64%
Massachusetts[16]	$357.00	$481.00	35%
Maine[17]	$331.31	$362.81	10%
New Hampshire[18]	$411.70	$582.00	41%
New Jersey[19]	$258.00	$318.00	23%
New Mexico[20]	$259.83	$356.34	37%
North Carolina[21]	$204.12	$344.76	69%
Ohio[22]	$444.73	$510.40	15%
Oregon[23]	$271.79	$313.97	16%
Pennsylvania, New Jersey, Maryland[24]	$289.20	$367.20	27%
Tennessee[25]	$306.00	$381.00	25%
Texas[26]	$329.40	$553.80	68%
Utah[27]	$307.23	$359.05	17%
West Virginia[28]	$375.40	$456.82	22%
Wisconsin[29]	$252.03	$400.55	59%
Wyoming[30]	$261.83	$343.00	31%
Average			**33%**

(Docket No. W-354, sub 364)

10 Dziegielewski, Ben et al. "Benchmark Investigation of Small Public Water Systems Economics." Southern Illinois University Carbondale. Department of Geography and Department of Agribusiness Economics. November 2000 at V-26.
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13 Rate schedules compiled from Web sites for all utilities serving more than 20,000 people (large utilities and very large utilities). Schedules for 4 out of 21 utilities were not found. Public system count = 15, private for-profit system count = 2. On file with Food & Water Watch.
14 Allen & Hoshall. "Kentucky Water and Sewer Rate Survey."August 21, 2006.
15 Rate schedules compiled from Web sites for all utilities serving more than 3,300 people (medium sized utilities and larger). Schedules for 11 out of 57 utilities were not found. Public system count = 41, private, for-profit system count = 2. On file with Food Water Watch.
16 Tighe & Bond. "2006 Massachusetts Water Rate Survey." 2006at 1 to 58; Safe Drinking Water Information System Pivot Tables, 2007.
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19 Peretz, Blossom A. et al. New Jersey Division of the Ratepayer Advocate. "Position papers on the water and wastewater resources of New Jersey." May 2001 at 7.
20 New Mexico Environment Department. Construction Programs Bureau. "Municipal Water and Wastewater User Charge Survey for 2007 Rates (Based on 6,000 gallons/month – December2007)." May 2008; Safe Drinking Water Information System PWS Inventory, 2007; Olson, Thomas W. New Mexico-American Water Company, Inc. Re: Case No. 06-00208-UT. Filed with the New Mexico Public Regulation Commission, Records Bureau.June 25, 2007.
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27 Utah Department of Environmental Quality. Division of Drinking Water. "2006 Survey of Community Drinking Water Systems." December 2007 at Appendix B: Public Water System Inventory Data, 2007.
28 West Virginia Public Service Commission. "Water Utility Cost Ranking as of May 15, 2009." May 15, 2009; West Virginia Public Service Commission, PSC Database. Available at www.psc.state. wv/utilities/default.htm, accessed May 2009; Jarrett, David. Public Service Commission of West Virginia. Annual Reports & Tariffs Section. "Annual Statistical Report." December 31, 2007 at 10 to 19.
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30 Wyoming Water Development Commission. "Water System Survey Report." 2007 at Report #1 and Report #4.