

SANFORD LAW OFFICE, PLLC

Jo Anne Sanford, Attorney at Law

November 18, 2019

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

Via Electronic Delivery

Re: Docket Nos. W-354, Subs 363, 364, and 365
Carolina Water Service, Inc. of North Carolina
Request for Extension of Time to File Rebuttal Testimony

Dear Ms. Campbell:

On behalf of Carolina Water Service, Inc. of North Carolina (“CWSNC” or “Company”), I write to request an extension of time to file rebuttal testimony. CWSNC’s support for this request is the following:

On January 17, 2019, in Docket No. W-354, Sub 363, CWSNC filed a *Petition for an Accounting Order to Defer Unplanned Incremental Hurricane Florence Storm Damage Expenses, Capital Investments, and Revenue Loss*.

On May 24, 2019, in Docket No. W-354, Sub 364, CWSNC filed a 30-day notice of intent to file an application for a general rate case pursuant to Commission Rule R1-17(a) of the Rules of Practice and Procedure of the Commission.

On June 6, 2019, the Commission, on its own motion, entered an *Order Consolidating Dockets* in the Sub 363 and Sub 364 proceedings.

CWSNC subsequently filed an application for a general rate case on June 28, 2019. On that same day, in Docket No. W-354, Sub 365, CWSNC also

filed a *Petition for an Accounting Order to Defer Post-In-Service Depreciation and Financing Costs Relating to Major New Projects*.

The Sub 365 docket, unlike the Sub 363 docket, has not, to date, been formally consolidated with the Sub 364 rate case, although both the Company and the Public Staff have treated and addressed the Sub 365 issues in testimony as being subject to decision by the Commission in the Sub 364 rate case.

Consistent with the Commission's action in terms of consolidating the Sub 363 and Sub 364 dockets, CWSNC filed a pleading on November 15, 2019, requesting that the Commission enter an Order consolidating the three dockets in question (Subs 363, 364, and 365) for purposes of hearing and decision. As of the time of this filing, the Commission has not ruled on the request to consolidate dockets.

Pursuant to the *Order Scheduling Hearings and Requiring Customer Notice* entered in the Sub 364 docket on August 2, 2019, CWSNC's rebuttal testimony is now due to be filed by Tuesday, November 19, 2019. The Public Staff filed its testimony on Monday, November 4, 2019, and CWSNC and the Staff commenced settlement negotiations on Thursday, November 7, 2019. Settlement discussions have continued and the Company and the Public Staff have reached settlement on some, but not all, issues, and a Stipulation of Settlement between these parties is in process. During the negotiations and discussions, CWSNC has provided substantial additional discovery responses that are under continuing evaluation by the Public Staff.

The Public Staff is in the process of developing its final position and anticipates filing supplemental accounting testimony and exhibits by today; Monday, November 18, 2019. Until that is done, CWSNC cannot determine with certainty the contested issues upon which it will file rebuttal testimony. That uncertainty requires the Company to file this request for an extension of time.

Assuming that the Public Staff files its supplemental accounting testimony today, CWSNC requests an extension of time until Thursday, November 21, 2019, to file the Company's rebuttal testimony. If the Public Staff does not file its supplemental testimony today, CWSNC requests an extension of time to file its rebuttal testimony until three business days after the Public Staff makes that filing. CWSNC's requested extension of time is essential in order for the Company to adequately prepare and prosecute its case and provide sufficient and necessary information in rebuttal.

CWSNC is authorized to state that the Public Staff and the Corolla Light Community Association, Inc., the only other parties to these proceedings, have been consulted and do not oppose this request.

Respectfully submitted this the 18th day of November 2019.

Electronically Submitted

/s/Jo Anne Sanford

State Bar No. 6831

Attorney for Carolina Water Service,
Inc. of North Carolina

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing **Request for Extension of Time to File Rebuttal Testimony**, filed by Carolina Water Service, Inc. of North Carolina in Docket Nos. W-354, Subs 363, 364, and 365, has been served on all parties of record in those proceedings, in accordance with North Carolina Utilities Commission Rule R1-39, either by: United States mail, first class postage pre-paid; by hand delivery; or by means of electronic delivery upon agreement of the receiving party.

This the 18th day of November 2019.

Electronically Submitted
/s/Jo Anne Sanford

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