

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

**STAFF CONFERENCE AGENDA
APRIL 15, 2019**

COMMISSION STAFF

NO AGENDA ITEMS

PUBLIC STAFF

E. WATER

- P1. DOCKET NO. W-354, SUBS 356A and 360 – CAROLINA WATER SERVICE, INC. OF NORTH CAROLINA. – REQUEST FOR APPROVAL OF WATER AND SEWER SYSTEM IMPROVEMENT CHARGE

EXPLANATION: On January 31, 2019, Carolina Water Service, Inc. of North Carolina (CWSNC), filed an application for approval of Water System Improvement Charge (WSIC) and Sewer System Improvement Charge (SSIC) rate adjustments effective April 1, 2019, pursuant to N.C. Gen. Stat. § 62-133.12, Commission Rules R7-39 and R10-26, and the WSIC and SSIC mechanisms, which were approved in CWSNC's general rate case, Docket No. W-354, Sub 336 (Sub 336 Rate Case) and in the Commission's prior Orders approving WSIC and SSIC mechanisms for CWSNC and the other Utilities, Inc. companies that have been merged into CWSNC.

On March 6, 2019, CWSNC filed a new version of the Appendix A to the WSIC and SSIC filing to reflect findings and conclusions made by the Commission in the Final Order issued in CWSNC's recent rate case proceeding, Docket No. W-354, Sub 360 (Sub 360 Rate Case).

The WSIC and SSIC procedures allow for semi-annual adjustments to CWSNC's rates every April 1st and October 1st, based upon reasonable and prudently incurred investment in eligible system improvements completed and placed in service prior to the filing of the request. Eligible system improvements are water and sewer system improvements set forth in N.C. Gen. Stat. § 62-133.12(a), (b), and (c) and shall include only those prudent and reasonable improvements found necessary by the Commission to provide safe, reliable, and efficient service in accordance with applicable water quality and effluent standards.

This is CWSNC's first filing to implement charges under the WSIC and SSIC mechanism since the Sub 360 Rate Case. CWSNC's request includes WSIC and SSIC projects completed and placed in service during the six months ending December 31, 2018.

CWSNC's proposed WSIC and SSIC percentages to be implemented on April 1, 2019, are as follows:

	<u>Previously Approved EMF Percentage</u>	<u>Updated WSIC/SSIC Percentage</u>	<u>Cumulative WSIC/SSIC Percentage</u>
Uniform Water	(0.05%)	0.39%	0.34%
Uniform Sewer	0.02%	0.41%	0.43%
BF/FH/TC Water	0.00%	0.39%	0.39%
BF Sewer	0.00%	0.11%	0.11%
FH Sewer	(0.07%)	0.11%	0.04%

Pursuant to N.C. Gen. Stat. § 62-133.12(g), the cumulative WSIC & SSIC percentages are capped at 5% of the total annual service revenues approved by the Commission in the Sub 360 Rate Case, resulting in the following maximum revenue requirement for CWSNC's water and sewer operations:

	<u>Service Revenues</u>	<u>Cap Percentage</u>	<u>WSIC/SSIC Cap</u>
Uniform Water	\$17,421,890	X 5%	\$871,095
Uniform Sewer	\$12,976,941	X 5%	\$648,847
BF/FH/TC Water	\$ 1,316,708	X 5%	\$65,835
BF/FH Sewer	\$ 2,149,098	X 5%	\$107,455

CWSNC's proposed revenue requirement does not exceed the maximum WSIC and SSIC revenue requirement listed above.

As stated by the Commission in its order adopting Rules R7-39 and R10-26 issued on June 6, 2014, in Docket No. W-100, Sub 54, the Public Staff is to review all infrastructure improvements proposed for recovery for eligibility and reasonableness prior to making its recommendation to the Commission on WSIC or SSIC rate adjustments. Furthermore, any WSIC or SSIC rate adjustments will be allowed to become effective, but not unconditionally approved. The adjustments may be rescinded retroactively in the Company's subsequent general rate case, at which time the adjustment may be further examined for a determination of its justness and reasonableness.

The Public Staff has carefully reviewed CWSNC's WSIC and SSIC improvements, including, reviewing in detail, construction work in progress ledgers and transactions, invoices, work orders, and other accounting records. Based on this review, the Public Staff has identified the following adjustments to CWSNC's WSIC and SSIC percentages at this time:

- 1) Adjust Projected Uniform Sewer Revenues - CWSNC removed projected service revenues for the Corolla Light and Monterey Shores sewer systems from total projected services revenues for Uniform Sewer operations to determine the updated Uniform Sewer SSIC percentage. The Public Staff is of the opinion that Corolla Light's and Monterey Shores' projected service revenues should be included in the calculation of the Uniform

Sewer SSIC percentage and that the annual Uniform Sewer SSIC revenue requirement also be recovered from customers in these subdivisions. Corolla Light's and Monterey Shores' rate base and operating expenses were used in determining the revenue requirement for Uniform Sewer operations in the recent Sub 360 Rate Case, which are being used as projected revenues in calculating the Uniform Sewer SSIC percentage in this proceeding. Because the Uniform Sewer revenue requirement resulted from rate base and operating expenses attributable to Corolla Light and Monterey Shores in the Sub 360 rate case, the SSIC revenue requirement should be recovered from all Uniform Sewer customers, including customers in the Corolla Light and Monterey Shores service areas. With the addition of the projected service revenues for Corolla Light and Monterey Shores, the cumulative Uniform Sewer SSIC percentage decreases from 0.43% to 0.39%.

2) Remove Non-Eligible Water and Sewer System Improvement Projects - After carefully reviewing invoices provided by the Company in response to our data request, the Public Staff has concluded that none of the water system improvement projects included in the Company's Application are eligible system improvement projects subject to WSIC recovery. Additionally, in the Public Staff's opinion, only \$117,965 of the \$386,772 in sewer system improvement projects included in the Application are eligible system improvements that can be recovered through the SSIC mechanism. Our examination of the invoices revealed that the non-eligible WSIC and SSIC projects were not system improvement projects, but were either routine maintenance and repairs or single service connections to CWSNC's water and sewer systems, which are not water and sewer system improvements as defined in N.C. Gen. Stat. § 62-133.12(b), (c), and (d).

Based on the adjustments above, the Public Staff recommends the following adjustments to the WSIC and SSIC percentages proposed by CWSNC:

	WSIC/SSIC Percentages Per CWSNC	WSIC/SSIC Revenue Requirement Per Public Staff	Impact of Public Staff Adjustments	WSIC/SSIC Percentage Per Public Staff
Uniform Water	0.34%	\$ 0.00	(0.39%)	(0.05%)
Uniform Sewer	0.43%	12,545	(0.31%)	0.12%
BF/FH/TC Water	0.39%	0.00	(0.39%)	0.00%
BF/TC Sewer	0.11%	0.00	(0.11%)	0.00%
FH Sewer	0.04%	0.00	(0.11%)	(0.07%)

The Public Staff has discussed its recommended adjustments with CWSNC and the Company wishes to proceed with the uncontested amounts as presented and calculated by the Public Staff. CWSNC asserts that there are significant differences with the Public Staff regarding the Company's interpretation and application of the WSIC/SSIC statute that are not reasonably resolvable in the context of this Application, but which the Company seeks to resolve in the near future with the Public Staff and, as necessary, the

Commission. CWSNC asserts that the Company's agreement to go forward with only the uncontested amounts in this case does not, and should not be interpreted to indicate concession as to the eligibility for recovery of the other contested WSIC/SSIC investments.

The Public Staff will continue to review the justness, prudence, and reasonableness of these improvements during its review of CWSNC's future WSIC and SSIC filings and in CWSNC's next general rate case.

The Public Staff recommends that CWSNC be allowed to implement the Public Staff's recommended WSIC and SSIC percentages effective for service rendered on or after April 15, 2019, subject to true-up.

EXHIBIT: A proposed order is attached as Exhibit No. P-1.

RECOMMENDATION: (Henry/Casselberry/Holt) That the Commission issue the proposed order approving the Public Staff's recommended water and sewer system improvement charges effective for service rendered on or after April 15, 2019, subject to true-up.

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-354, SUB 356A and 360

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
Application by Carolina Water Service, Inc. of)
North Carolina, 4944 Parkway Plaza)
Boulevard, Suite 375, Charlotte, North)
Carolina 28217, for Authority to Implement)
Water and Sewer System Improvement)
Surcharge Rate Adjustments Pursuant to)
N.C. Gen. Stat. § 62-133.12)

ORDER APPROVING WATER AND
SEWER SYSTEM IMPROVEMENT
CHARGE ON A PROVISIONAL
BASIS, AND REQUIRING
CUSTOMER NOTICE

BY THE COMMISSION: On January 31, 2019, Carolina Water Service, Inc. of North Carolina (CWSNC), filed an application for approval of Water System Improvement Charge (WSIC) and Sewer System Improvement Charge (SSIC) rate adjustments effective April 1, 2019, pursuant to N.C. Gen. Stat. § 62-133.12, Commission Rules R7-39 and R10-26, and the WSIC and SSIC mechanisms, which were approved in CWSNC's general rate case, Docket No. W-354, Sub 336 (Sub 336 Rate Case) and in the Commission's prior Orders approving WSIC and SSIC mechanisms for CWSNC and the other Utilities, Inc. companies that have been merged into CWSNC.

On March 6, 2019, CWSNC filed a new version of the Appendix A to the WSIC and SSIC filing to reflect findings and conclusions made by the Commission in the Final Order issued in CWSNC's recent rate case proceeding, Docket No. W-354, Sub 360 (Sub 360 Rate Case).

On March 11, 2019, the Public Staff filed Notice of Public Staff's Plan to Present Comments and Recommendations at the Commission's March 25, 2019, Regular Staff Conference. On March 15, 2019, the Public Staff withdrew its notice. On March 29, 2019, the Public Staff filed a second Notice of Public Staff's Plan to Present Comments and Recommendations at the Commission's April 15, 2019, Regular Staff Conference. The Public Staff presented its recommendations to the Commission at its Regular Staff Conference on April 15, 2019.

On the basis of CWSNC's verified Application and the records of the Commission, and the comments and recommendations of the Public Staff, the Commission makes the following findings and conclusions.

FINDINGS OF FACT

1. CWSNC is a corporation duly organized under the laws of and is authorized to do business in the State of North Carolina. CWSNC is a franchised public utility providing water and sewer utility service to customers in North Carolina.

2. In CWSNC's general rate case, Sub 336 Rate Case, the Commission approved, in its Order dated March 10, 2014, CWSNC's request to utilize a Water and Sewer System Improvement Charge (WSIC and SSIC) mechanism pursuant to N.C. Gen. Stat. § 62-133.12 concluding the mechanism is in the public interest, and established WSIC and SSIC procedures for CWSNC.

3. The WSIC and SSIC procedures allow for semi-annual adjustments to CWSNC's rates every April 1st and October 1st based upon reasonable and prudently incurred investment in eligible system improvements completed and placed in service prior to the filing of the request. Eligible system improvements are water and sewer system improvements set forth in N.C. Gen. Stat. § 62-133.12(b), (c), and (d) and shall include only those prudent and reasonable improvements found necessary by the Commission to provide safe, reliable, and efficient service in accordance with applicable water quality and effluent standards.

4. CWSNC's WSIC and SSIC percentages were reset to zero as of February 21, 2019, the effective date of CWSNC's new base rates in its Sub 360 Rate Case.

5. This is CWSNC's first filing to implement charges under the WSIC and SSIC mechanism since the Sub 360 Rate Case. CWSNC's request includes WSIC and SSIC projects completed and placed in service during the six months ending December 31, 2018.

6. CWSNC's proposed WSIC and SSIC percentages to be implemented on April 1, 2019, are as follows:

	Previously Approved <u>EMF Percentage</u>	Updated WSIC/SSIC <u>Percentage</u>	Cumulative WSIC/SSIC <u>Percentage</u>
Uniform Water	(0.05%)	0.39%	0.34%
Uniform Sewer	0.02%	0.41%	0.43%
BF/FH/TC Water	0.00%	0.39%	0.39%
BF Sewer	0.00%	0.11%	0.11%
FH Sewer	(0.07%)	0.11%	0.04%

7. Pursuant to N.C. Gen. Stat. § 62-133.12(g), the cumulative WSIC & SSIC percentages are capped at 5% of the total annual service revenues approved by the Commission in the Sub 360 Rate Case, resulting in the following maximum revenue requirement for CWSNC's water and sewer operations:

	<u>Service Revenues</u>	<u>Cap Percentage</u>	<u>WSIC/SSIC Cap</u>
Uniform Water	\$17,421,890	X 5%	\$871,095
Uniform Sewer	\$12,976,941	X 5%	\$648,847
BF/FH/TC Water	\$ 1,316,708	X 5%	\$65,835
BF/FH Sewer	\$ 2,149,098	X 5%	\$107,455

8. CWSNC's proposed revenue requirement does not exceed the maximum WSIC and SSIC revenue requirement listed above.

9. As stated by the Commission in its order adopting Rules R7-39 and R10-26 issued on June 6, 2014, in Docket No. W-100, Sub 54, the Public Staff is to review all infrastructure improvements proposed for recovery for eligibility and reasonableness prior to making its recommendation to the Commission on WSIC or SSIC rate adjustments. Furthermore, any WSIC or SSIC rate adjustments will be allowed to become effective, but not unconditionally approved. The adjustments may be rescinded retroactively in the Company's subsequent general rate case, at which time the adjustment may be further examined for a determination of its justness and reasonableness.

10. The Public Staff carefully reviewed CWSNC's WSIC and SSIC improvements, including, reviewing in detail, construction work in progress ledgers and transactions, invoices, work orders, and other accounting records. Based on this review, the Public Staff identified the following adjustments to CWSNC's WSIC and SSIC percentages at this time:

1) Adjust Projected Uniform Sewer Revenues - CWSNC removed projected service revenues for the Corolla Light and Monterey Shores sewer systems from total projected services revenues for Uniform Sewer operations to determine the updated Uniform Sewer SSIC percentage. The Public Staff is of the opinion that Corolla Light's and Monterey Shores' projected service revenues should be included in the calculation of the Uniform Sewer SSIC percentage and that the annual Uniform Sewer SSIC revenue requirement also be recovered from customers in these subdivisions. Corolla Light's and Monterey Shores' rate base and operating expenses were used in determining the revenue requirement for Uniform Sewer operations in the recent Sub 360 Rate Case, which are being used as projected revenues in calculating the Uniform Sewer SSIC percentage in this proceeding. Because the Uniform Sewer revenue requirement resulted from rate base and operating expenses attributable to Corolla Light and Monterey Shores in the

Sub 360 rate case, the SSIC revenue requirement should be recovered from all Uniform Sewer customers, including customers in the Corolla Light and Monterey Shores service areas. With the addition of the projected service revenues for Corolla Light and Monterey Shores, the cumulative Uniform Sewer SSIC percentage decreases from 0.43% to 0.39%.

2) Remove Non-Eligible Water and Sewer System Improvement Projects - After carefully reviewing invoices provided by the Company in response to Public Staff data request, the Public Staff concluded that none of the water system improvement projects included in the Company's Application are eligible system improvement projects subject to WSIC recovery. Additionally, in the Public Staff's opinion, only \$117,965 of the \$386,772 in sewer system improvement projects included in the Application are eligible system improvements that can be recovered through the SSIC mechanism. The Public Staff's examination of the invoices revealed that the non-eligible WSIC and SSIC projects were not system improvement projects, but were either routine maintenance and repairs or single service connections to CWSNC's water and sewer systems, which are not water and sewer system improvements as defined in N.C. Gen. Stat. § 62-133.12(b), (c), and (d).

11. Based on the adjustments above, the Public Staff recommended the following adjustments to the WSIC and SSIC percentages proposed by CWSNC:

	WSIC/SSIC Percentages Per CWSNC	WSIC/SSIC Revenue Requirement Per Public Staff	Impact of Public Staff Adjustments	WSIC/SSIC Percentage Per Public Staff
Uniform Water	0.34%	\$ 0.00	(0.39%)	(0.05%)
Uniform Sewer	0.43%	12,545	(0.31%)	0.12%
BF/FH/TC Water	0.39%	0.00	(0.39%)	0.00%
BF/TC Sewer	0.11%	0.00	(0.11%)	0.00%
FH Sewer	0.04%	0.00	(0.11%)	(0.07%)

12. The WSIC and SSIC percentages recommended by the Public Staff result in the following increase/decrease to the average monthly metered and flat rate customer bill:

	Public Staff Recommended WSIC/SSIC Surcharge	Average Gallons Per Month	Average Monthly Bill	Monthly Surcharge	Monthly Bill With WSIC/SSIC Surcharge
Uniform Water	(0.05%)	3,680	\$53.58	(\$0.03)	\$53.55
Uniform Sewer	0.12%	3,180	\$57.82	\$0.07	\$57.89
CL/MS Sewer	0.12%	3,180	\$73.11	\$0.09	\$73.20
BF/FH/TC Water	0.00%	4,115	\$32.17	\$0.00	\$32.17
BF Sewer	0.00%	Flat	\$50.46	\$0.00	\$50.46
FH Sewer	(0.07%)	Flat	\$50.46	(\$0.04)	\$50.42

13. The Public Staff stated that it had discussed its recommended adjustments with CWSNC and the Company wished to proceed with the uncontested amounts as presented and calculated by the Public Staff. According to the Public Staff, CWSNC asserted, however, that there are significant differences between the Company and the Public Staff regarding the interpretation and application of the WSIC/SSIC statute that are not reasonably resolvable in the context of this Application, but which the Company seeks to resolve in the near future with the Public Staff and, as necessary, the Commission. CWSNC also asserted that the Company's agreement to go forward with only the uncontested amounts in this case does not, and should not be interpreted to, indicate concession as to the eligibility for recovery of the other contested WSIC/SSIC investments.

14. The Public Staff further stated that it will continue to review the justness, prudence, and reasonableness of the improvements during its review of CWSNC's future WSIC and SSIC filings and in CWSNC's next general rate case.

Based upon the foregoing, the Commission concludes that CWSNC should be allowed to implement the Public Staff's recommended WSIC and SSIC percentages effective for service rendered on or after April 15, 2017, subject to true-up.

IT IS, THEREFORE, ORDERED as follows:

1. That CWSNC is authorized to implement the proposed Water and Sewer System Improvement Charges set forth in the attached Appendix A-4 to CWSNC's Schedule of Rates effective for service rendered on and after April 15, 2019, subject to true-up.

2. That the attached Appendix A-4 is approved and is deemed filed with the Commission pursuant to N.C. Gen. Stat. § 62-138.

3. That CWSNC shall mail to each of its affected customers with the next regularly scheduled customer billing the Commission approved customer notice.

ISSUED BY ORDER OF THE COMMISSION.

This the ____ day of _____, 2019.

NORTH CAROLINA UTILITIES COMMISSION

A. Shonta Dunston, Deputy Clerk

**CAROLINA WATER SERVICE INC. OF NORTH CAROLINA
WATER AND SEWER SYSTEM IMPROVEMENT CHARGES**

WATER SYSTEM IMPROVEMENT CHARGE

All CWSNC water systems except as noted below	(0.05%) ^{1/} and ^{2/}
Bradfield Farms/Fairfield Harbour/Treasure Cove	0.00% ^{3/}

SEWER SYSTEM IMPROVEMENT CHARGE

All CWSNC sewer systems except as noted below	0.12% ^{4/} and ^{2/}
Corolla Light and Monterey Shores service areas	0.12% ^{4/} , ^{2/} and ^{5/}
Bradfield Farms service area	0.00% ^{5/}
Farifield Harbour service area	(0.07%) ^{4/} , ^{2/} and ^{5/}

Notes

- 1/ The Water System Improvement Charge will be applied to the total water utility bill of each customer under the Company's applicable rates and charges.
- 2/ These Water and Sewer Improvement Charges include the Experience Modification Factors that went into effect on October 1, 2018, and will cease on September 30, 2019.
- 3/ These water systems have separate rates that were approved in the CWSNC's general rate case, Docket No. W-354, Sub 360.
- 4/ The Sewer System Improvement Charge will be applied to the total sewer utility bill of each customer under the Company's applicable rates and charges.
- 5/ These sewer systems have separate rates that were approved in the CWSNC's general rate case, Docket No. W-354, Sub 360.

Issued in Accordance with Authority Granted by the North Carolina Utilities Commission in Docket No. W-354, Subs 356A and 360 on this the _____ day of _____, 2019.

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-354, SUBS 356A and 360

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application by Carolina Water Service, Inc. of North Carolina,)
4944 Parkway Plaza Boulevard, Suite 375, Charlotte, North) NOTICE TO
Carolina 28217, for Authority to Implement Water and Sewer) CUSTOMERS
System Improvement Surcharge Rate Adjustments Pursuant to)
N.C. Gen. Stat. § 62-133.12)

NOTICE IS HEREBY GIVEN that the North Carolina Utilities Commission (Commission) has issued an Order dated April____, 2019, pursuant to N.C. Gen. Stat. § 62-133.12 and Commission Rule R7-39 and R10-26, authorizing Carolina Water Service Inc. of North Carolina (CWSNC) to implement a Water System Improvement Charge (WSIC) and Sewer System Improvement Charge (SSIC) for service rendered on and after April 15, 2019, in all its service areas in North Carolina.

By Order entered in Docket No. W-354, Sub 336 on March 10, 2014, the Commission approved CWSNC’s request, pursuant to N.C. Gen. Stat. § 62-133.12, for authority to implement a semi-annual water and sewer system improvement charge (WSIC and SSIC) adjustment mechanism designed to recover the incremental costs associated with eligible investments in certain water and sewer infrastructure improvement projects completed and placed in service between general rate case proceedings. The WSIC and SSIC mechanism is subject to Commission approval and to audit and refund provisions. Any cumulative system improvement charge recovered pursuant to the WSIC and SSIC mechanism may not exceed 5% of the total annual service revenues approved by the Commission in CWSNC’s last general rate case.

Commission Rules R7-39(h) and R10-26(h) specify that the WSIC and SSIC shall be applied to the total utility bill of each customer under the utility’s applicable service rates and charges.

The Public Staff has carefully reviewed CWSNC’s WSIC and SSIC improvements, including, reviewing in detail, construction work in progress ledgers and transactions, invoices, work orders, and other accounting records, and recommended that the Company’s WSIC and SSIC charges be approved.

The WSIC and SSIC percentages recommended by the Public Staff result in the following increase/decrease to the average monthly metered and flat rate customer bill:

	Public Staff Recommended WSIC/SSIC <u>Surcharge</u>	Average Gallons <u>Per Month</u>	Average Monthly <u>Bill</u>	Monthly <u>Surcharge</u>	Monthly Bill With WSIC/SSIC <u>Surcharge</u>
Uniform Water	(0.05%)	3,680	\$53.58	(\$0.03)	\$53.55
Uniform Sewer	0.12%	3,180	\$57.82	\$0.07	\$57.89
CL/MS Sewer	0.12%	3,180	\$73.11	\$0.09	\$73.20
BF/FH/TC Water	0.00%	4,115	\$32.17	\$0.00	\$32.17
BF Sewer	0.00%	Flat	\$50.46	\$0.00	\$50.46
FH Sewer	(0.07%)	Flat	\$50.46	(\$0.04)	\$50.42

Additional information regarding the WSIC and SSIC mechanism is contained in the Commission’s Order dated March 10, 2014, in Docket No. W-354, Sub 336, the Commission’s Order Adopting Rules to Implement N.C. Gen. Stat. § 62-133.12, dated June 6, 2014, in Docket No. W-100, Sub 54, the CWSNC WSIC and SSIC Application filed January 31, 2019, the March 29, 2019 Public Staff Notice, and the April ____, 2019 Commission Order in Docket No. W-354, Subs 356A and 360, all of which can be accessed from the Commission’s website at www.ncuc.net, under Docket Portal, using the Docket Search feature for the docket numbers stated above (i.e., for Docket No. key: W-354 Sub 356A or W-354, Sub 360).

Parties interested in receiving notice of these filings may subscribe to the Commission’s electronic notification system through the Commission’s website at www.ncuc.net.

ISSUED BY ORDER OF THE COMMISSION.

This the _____ day of April, 2019.

NORTH CAROLINA UTILITIES COMMISSION

A. Shonta Dunston, Deputy Clerk

CERTIFICATE OF SERVICE

I, _____, mailed with sufficient postage or hand delivered to all affected customers the attached Notice to Customers issued by the North Carolina Utilities Commission in Docket No.W-354, Subs 356A and 360, and the Notices were mailed or hand delivered by the date specified in the Order.

This the ____ day of _____, 2019.

By: _____
Signature

Name of Utility Company

The above named Applicant, _____, personally appeared before me this day and, being first duly sworn, says that the required Notices to Customers were mailed or hand delivered to all affected customers, as required by the Commission Order dated _____, 2019, in Docket No. W-354, Subs 356A and 360.

Witness my hand and notarial seal, this the ____ day of _____, 2019.

Notary Public

Printed Name

(SEAL) My Commission Expires: _____
Date