




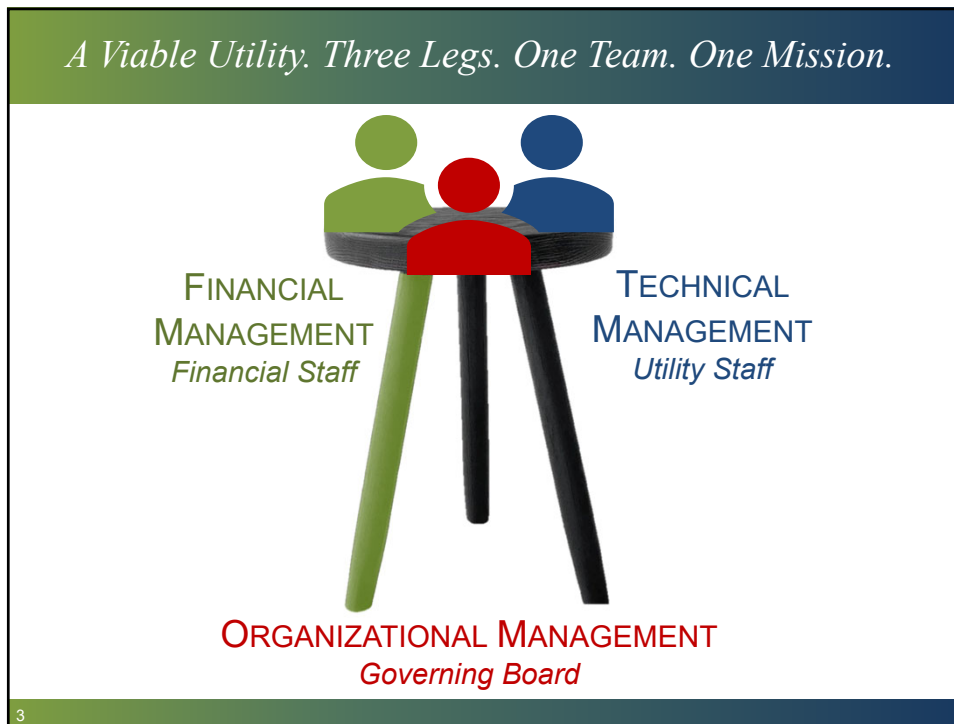
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Today's Session 

- **Kristen Downs, PhD, EI, Engineer, Viable Utility Unit**
 - Introduction
 - NC water and sewer utility landscape
 - Overview of the Viability Utility (VU) Program
 - VU annual assessments
- **Dewey Williard, Financial Analyst, Viable Utility Unit**
 - Linking financial and utility management
 - Highlights of financial best practices for water and sewer utilities
 - Implications for your system and opportunities for partnerships
 - Resources

Questions? Contact us at:
kristen.downs@deq.nc.gov | dewey.williard@deq.nc.gov

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Water & Wastewater Quiz

Identify whether each term applies to:

- a) Drinking water (DW)
- b) Wastewater (WW)
- c) Both

1. Disinfection
2. Collection system
3. Capacity

- **Bonus:** What percentage (%) of its capacity is your utility using on average?

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Water & Wastewater Quiz: ANSWERS

1. Disinfection

- c) BOTH

2. Collection system

- b) Wastewater

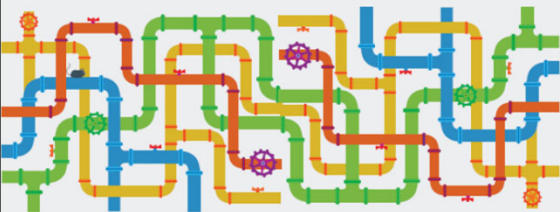
3. Capacity

- c) BOTH


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NC's Water & Sewer Utility Landscape



NEARLY **1,800** SYSTEMS SERVE **10%** OF NC'S POPULATION



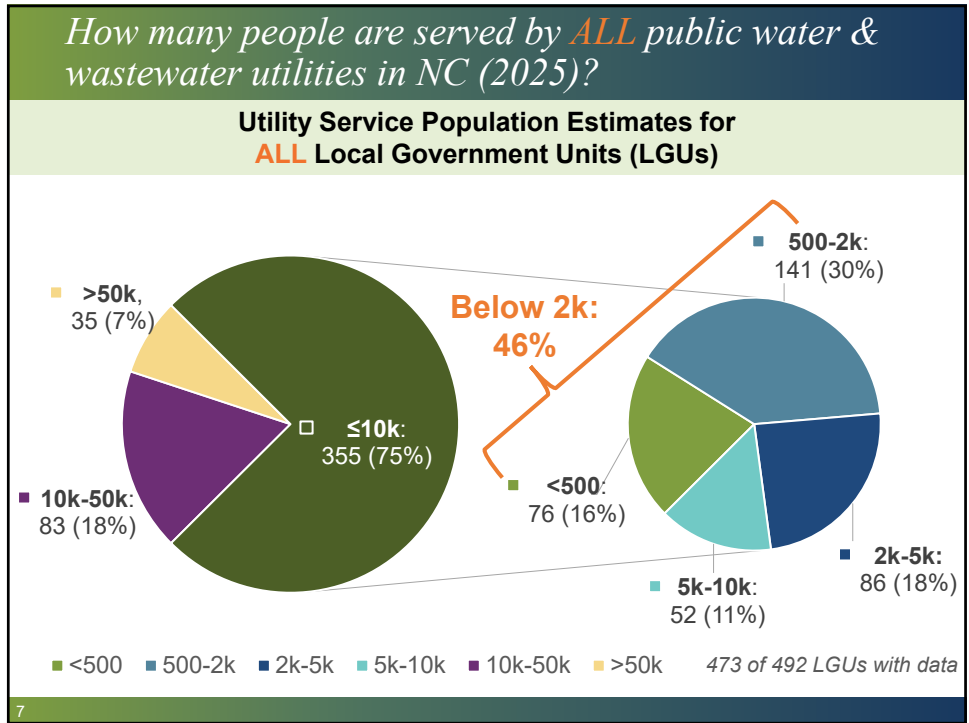
THE LARGEST **10** SYSTEMS SERVE **30%** OF NC'S POPULATION



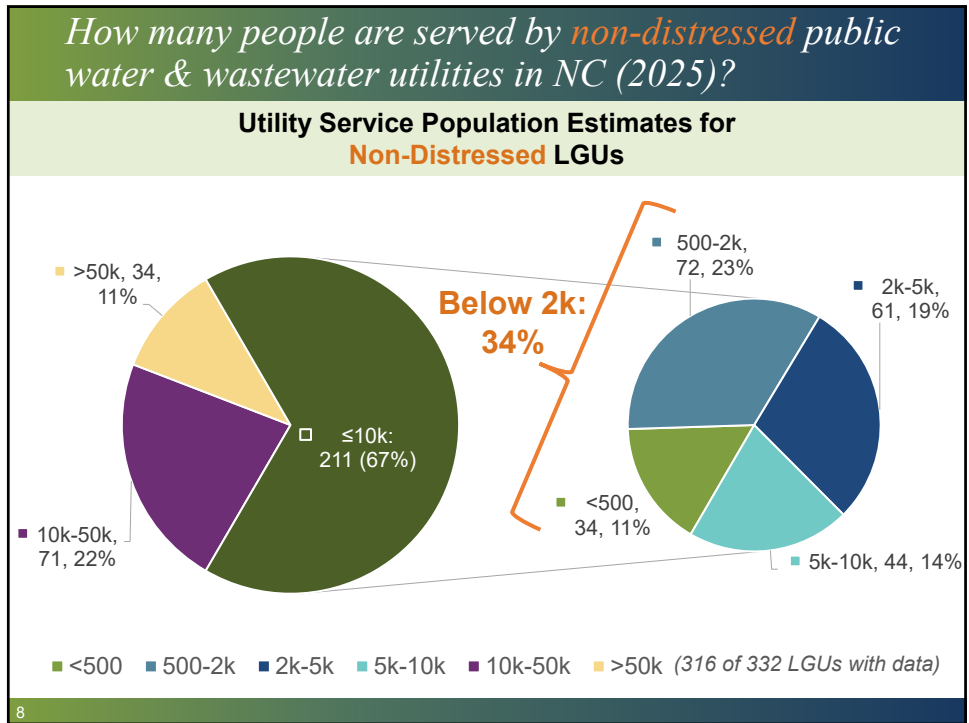
*estimates for drinking water systems in NC

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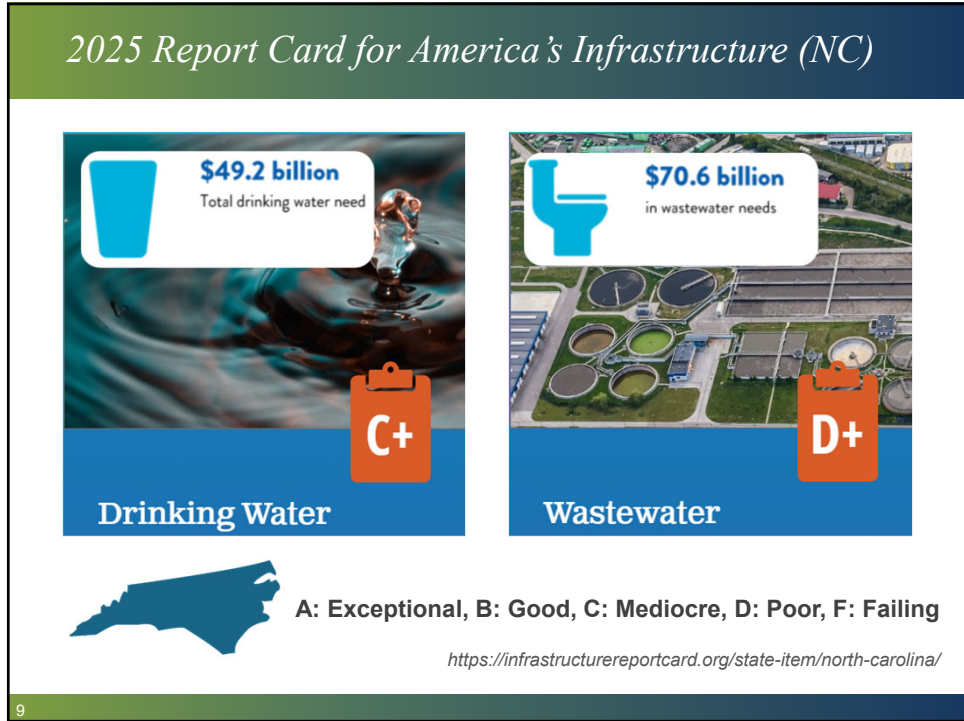
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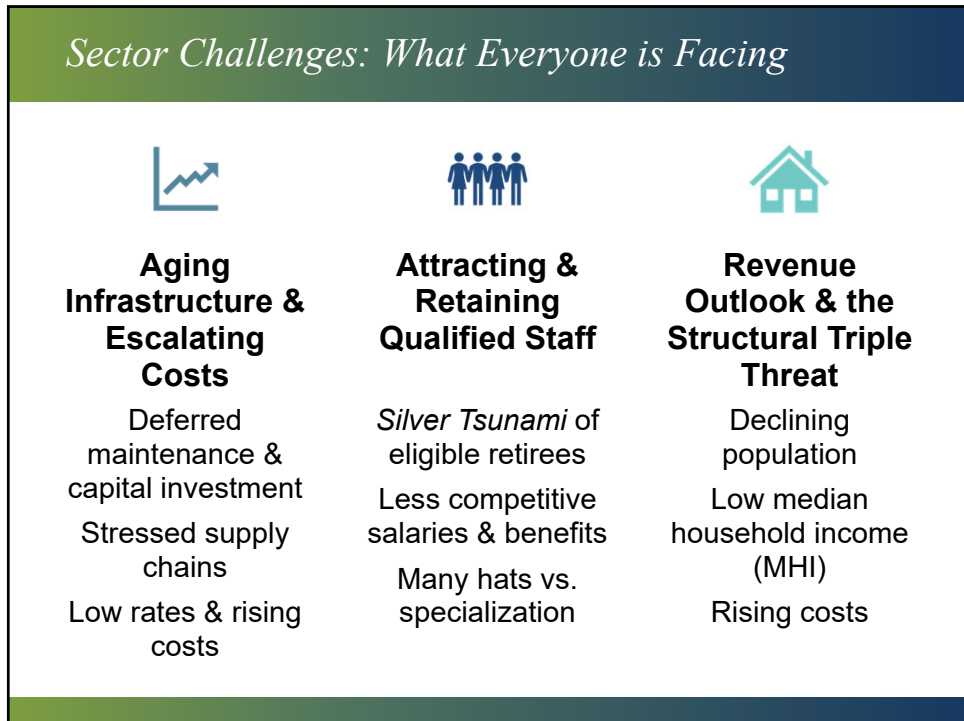
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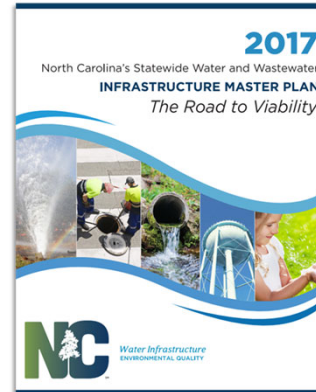


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What is Viability?

A viable system is one that:

- functions as a long-term, self-sufficient business enterprise
- establishes organizational excellence
- provides appropriate levels of infrastructure maintenance, operation, and reinvestment that allow it to **provide reliable water services now and in the future.**



State Water Infrastructure Authority's Infrastructure Master Plan (SWIA 2017)

<https://www.deq.nc.gov/about/divisions/water-infrastructure/viable-utilities>

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Viable Utilities Program – Vision and Mission

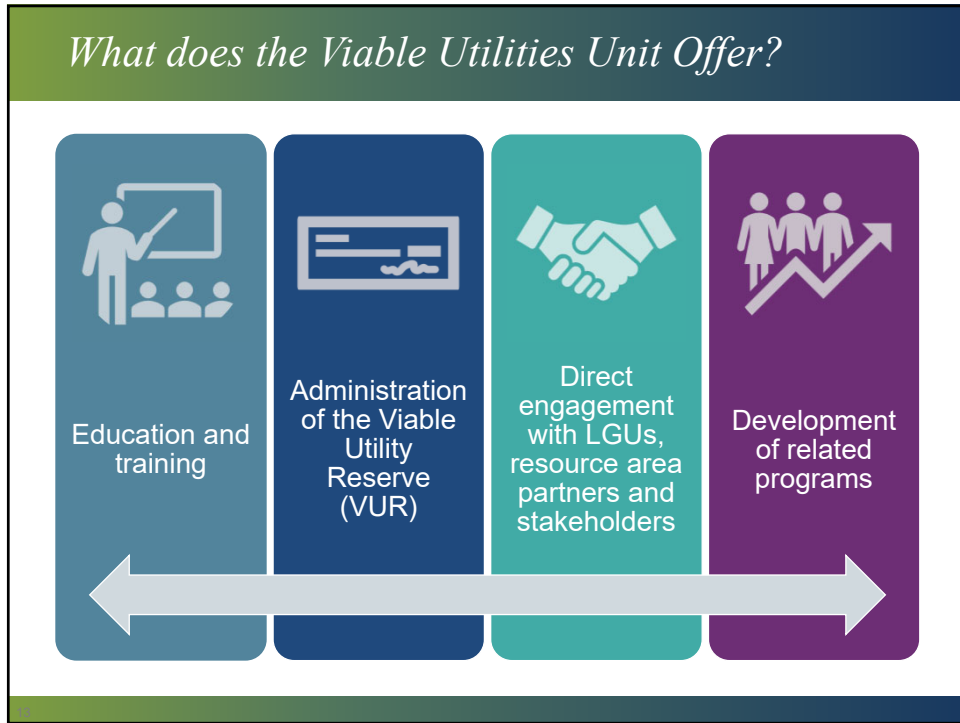
- The **mission** of the Viable Utilities Program is to:
 - promote, facilitate and incentivize best practices for water and wastewater utilities owned by local governments,
 - prevent utility distress and ensure that such systems can remain viable into the future.
- Signed into law on July 1, 2020 (Reform of Water and Wastewater Public Enterprises, **S.L. 2020-79**)
- Codified in **NCGS §159G**, Water Infrastructure

*The **vision** of the VU program is that **publicly-owned water and wastewater utilities** in North Carolina are viable or on a path to viability, with access to the resources needed to **operate efficiently, maximize customer value, and remain viable for the foreseeable future.***

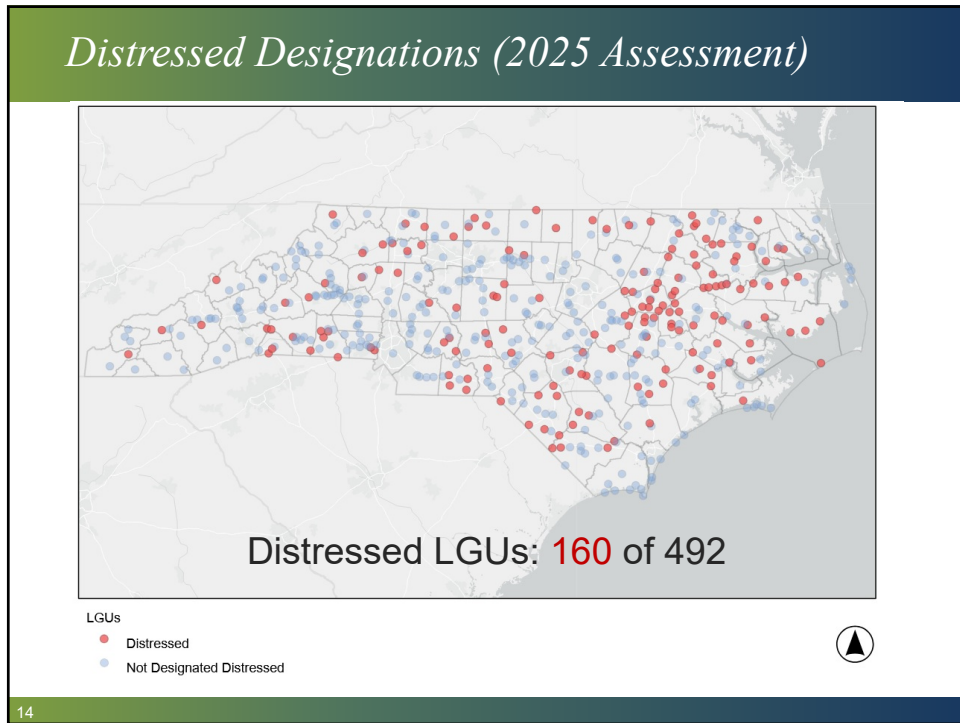
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<https://www.deq.nc.gov/about/divisions/water-infrastructure/viable-utilities>

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Distressed Designation — What It Means (& Doesn't)

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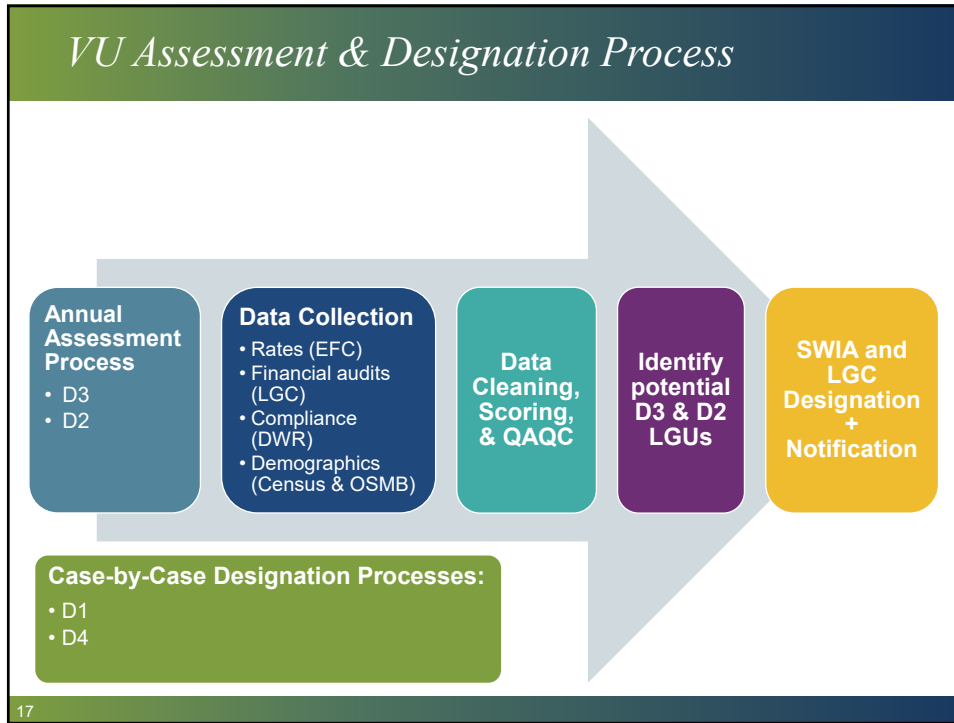
Distressed Unit Identification Criteria

- The State Water Infrastructure Authority (SWIA) and Local Government Commission (LGC) adopted the following Identification Criteria to be used to identify distressed units:

1 D1: LGC fiscal control	2 D2: 2+ years late audits	3 D3: Score \geq 9	4 D4: Other info (SWIA or LGC)
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Assessment Scorecard & Financial Criteria (2025)

Criteria: Statutory | Infrastructure/Organizational | Financial

Unit Assessment Criteria Scorecard - 2025 Scores

Unit Name: _____
 Total Score: _____ Audit Year Used: _____
 Type of System (Water (DW)/Sewer (WW)): _____

As required by Session Law 2020-79 (S.L. 2020-79), The Local Government Commission (LGC) and State Water Infrastructure Authority (Authority) have developed criteria to identify local governments that may be struggling to provide water and/or sewer services. Assessment criteria include parameters required by the statute, infrastructure and organizational issues, and indicators of financial strain. This score card shows the points your unit scored and the data values used to determine those points. The attached Unit Scorecard Explanation provides additional information about each of the parameters that contribute to the score. Units that are considered at risk of being designated distressed under the law. (Note that this is a change from previous years when 1 threshold of 2 or more points was used for units that provide both water and sewer service and a threshold of 8 or more was used for single water/sewer providers.)

Statutory Points				Infrastructure/Organizational Points						Financial Points							
Criteria	Service Population	Debt Service Coverage Ratio	Transfers Out	Transfers In	Affordability	UAL Control	DW Compliance	WW / CS Compliance	Flow Moratorium	Rate (2024 Inside \$/1000 gal)	Revenue Outlook	Surplus (Deficit) w/ Debt	No Debt DSCR Test	% Depreciated	Operating Margin	Quick Ratio	Receivables Ratio
Points Scored																	
Value Used					# of Indicators	DW Compliance TT: DW Compliance MCL = ALE	WW Compliance: Collection Sys. Compliance		DW: WW: Combined	Population Change: (also considers rates)		Surplus w/ Debt: W/ \$1 Million Test if No Debt					Ratio Trend:

Debt Service Coverage Ratio (DSCR)

Affordability

UAL Control Issues (3)

Surplus (Deficit) w/ Debt (2)
No Debt DSCR Test
% Depreciation

Transfers in/out (≥ 2 in last 5 years)

Revenue Outlook (High rates & declining pop) (4)

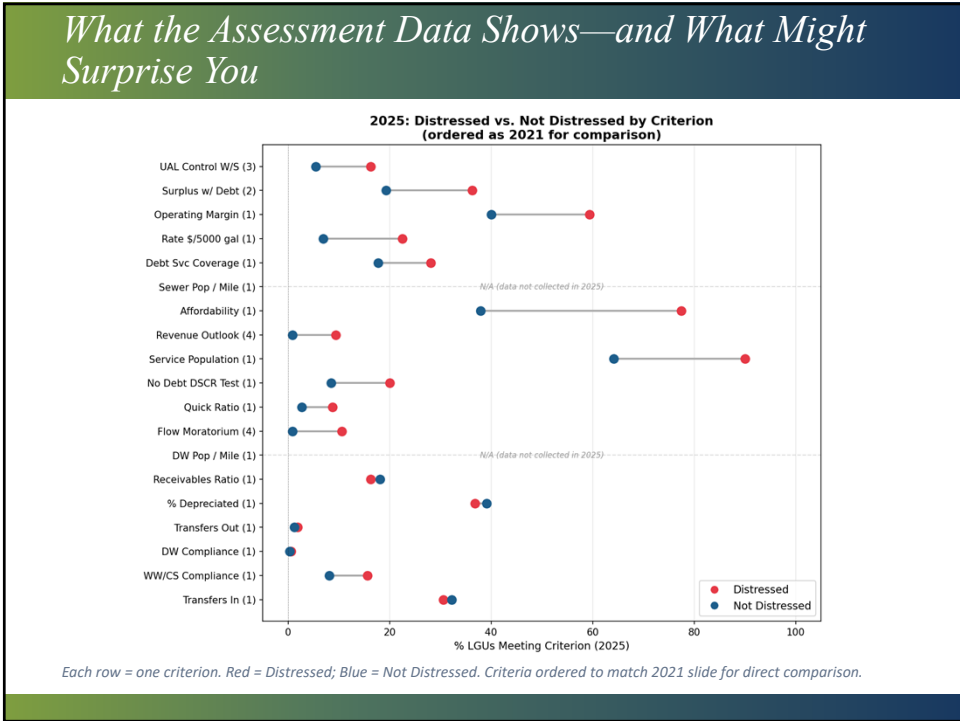
Rates: Monthly Bill (\$ per 5k gal)

Operating Margin
Quick Ratio
Receivables Ratio

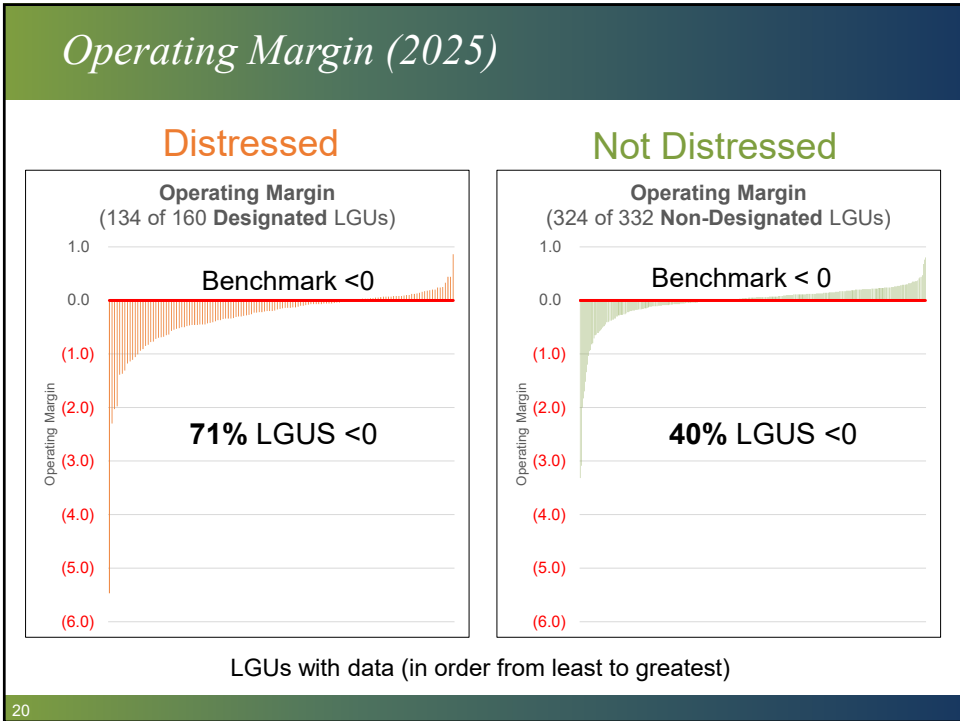
Criteria are worth one (1) point unless otherwise indicated

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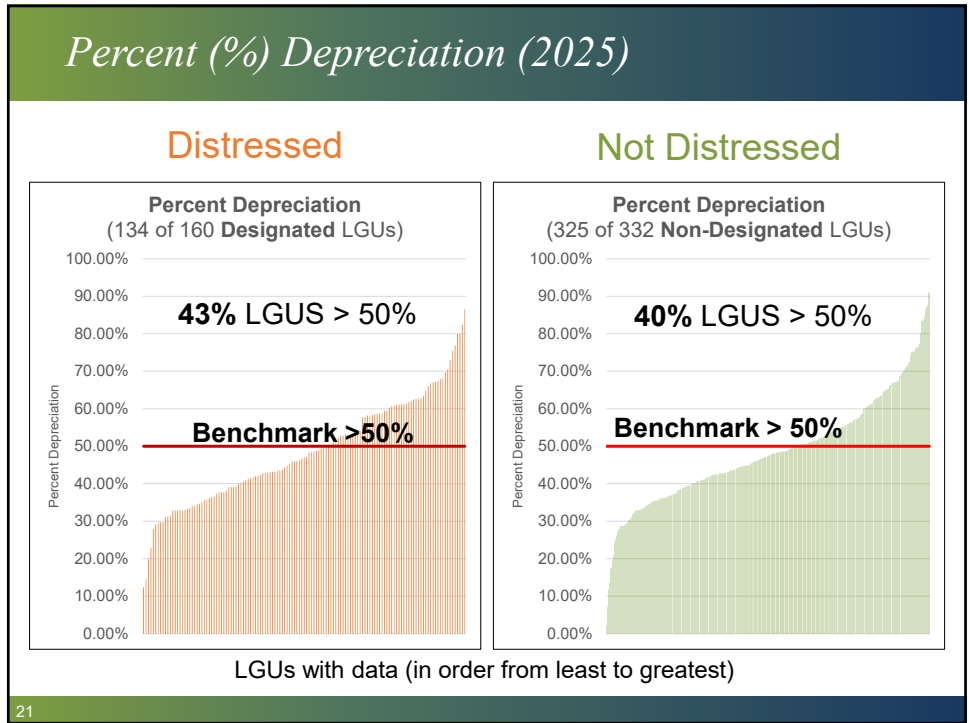
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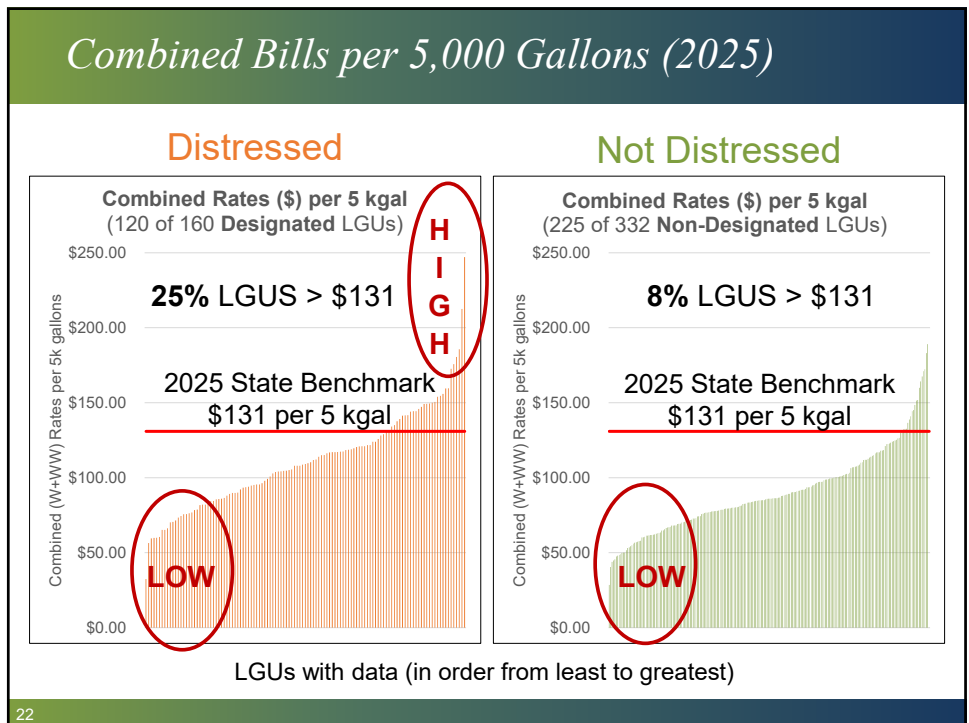
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10 Key—and 7 Financial—Best Utility Management Practices for Effective Governing Boards

Financial:


- Understand** basic financial management (budget, debt)
- Conduct** rate study and annual rate checkups
- Manage** fund balances & reserves
- Have** strong collections policy
- Review** budget monthly or quarterly
- Perform** pre-audits
- Oversee** (and understand) audits and financial benchmarking

Organizational:

- Establish** organizational excellence
- Formalize** Board oversight


Infrastructural:

- Manage** assets: maintain, rehab, and replace




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#1 Budget Conservatively & Understand Debt




Realistic budgets?

- Operations & maintenance (O&M)
- Capital rehabilitation & replacement (R&R)
- Human capital




Population changes?

- Revenue projections need to account for fewer (or more) customers



Declining revenue?

- Aging meters under-read & need replacement
- Inaccuracies → Revenue impacts




DW & WW Audit:

- Compare volumes: Treated – Billed
- Big gaps = Leaks!
- DW: Water loss
- WW: Inflow & Infiltration (I&I)

Budget line-item monitoring reveals operational signals, not just accounting variances

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#2 Rate Studies and Rate Checkups

<p>North Carolina Department of Environmental Quality</p> <p>Division of Water Infrastructure</p>	
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Rate Study Guidance Document

For Local Government Units Designated as Distressed and/or Completing a Rate Study with Funding from the Division of Water Infrastructure

(Last updated: March 2025)

<https://www.deq.nc.gov/water-infrastructure/rate-study-guidance-document-final>

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#2 Rate Studies and Rate Checkups

- **Achieving Full Cost Recovery**
 - **DWI Guidance: 1+ full cost pricing scenario within 5 years**
 - Operations and maintenance (O&M) expenses
 - Capital spending from adopted Capital Improvement Plan (CIP)
 - Long-term infrastructure needs
 - Existing debt service
 - Principle + interest payments
 - Reserve contributions
 - Emergency, capital projects, etc.
 - Does *not* rely on grant funding for projects

- **All Scenarios**
 - 1+ year of historical audited information (more = better)
 - 10+ years of projections

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#2 Rate Studies and Rate Checkups

Considerations	Inflation + changes beyond inflation <ul style="list-style-type: none"> • Chemicals • Materials • Construction 	Anticipated Expenses <ul style="list-style-type: none"> • Capital projects • Major purchases • Debt payments
	Workforce hiring & retention <ul style="list-style-type: none"> • Anticipated retirement • Institutional knowledge • Competitive salaries & benefits 	Patterns & changes in consumption <ul style="list-style-type: none"> • By customer class • Seasonal? Drought? • Loss/gain of large customers
	Rate changes & impacts: How much? How often? <ul style="list-style-type: none"> • Smaller annual >> Large one-off • Customer Assistance Programs (CAPs) via general fund or external partner 	Customer Communication <ul style="list-style-type: none"> • Control the narrative • Billed vs. Actual costs • Why do rates need to increase?

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Capital Improvement Plan (CIP) → Rate Study

A well-designed CIP

- Is based on an Asset Management Plan (AMP),
- Includes:
 - A comprehensive asset inventory,
 - Cost estimates and project plans,
 - Timelines for implementation, and
 - Potential funding sources,¹
- Should be incorporated into a rate study.

¹ <https://efcnetwork.org/why-capital-improvement-plans-matter-for-wastewater-utilities/>

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#2 Rate Studies and Rate Checkups

- **Rate Study**
 - Analysis of past and projected income and expenses
 - Recommends a rate structure to provide revenues adequate to fund reliable delivery of services into the future.
 - May require outside expertise.
- **Rate Checkup**
 - Review of previous rate study, budget (actuals vs. future estimates), and current conditions
 - Conducted at least annually during budget setting.
 - May be done by internal staff/board members.

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UNC SOG EFC Dashboard & Tool for Rates

<https://efc.sog.unc.edu/dashboards/>

- UNC EFC updates their Water and Wastewater Rates Dashboard for NC annually
- Includes (examples):
 - Rates Comparison
 - All Utilities
 - Similar Customer Income
 - Similar Revenue Generation
 - Same Ownership type, etc.
 - Financial Benchmarks
 - OR
 - DSCR
 - Days Cash on Hand, etc.
 - Utility Characteristics
 - Est. Number of Connections
 - Est. Service Population, etc.

<https://efc.sog.unc.edu/resource/water-and-wastewater-rates-analysis-model/>

- Free tool to do your own simplified rates analysis

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#4 Customer Policies and Collections

- **NC Finance Connect**
 - <https://ncfinanceconnect.com/>
 - N.C. Local Government Finance Policy Manual
 - 12 of 20 available + more to come!
 - NC Finance Listserv signup

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#4 Customer Policies and Collections

Deposit Policy

- Needs to be based on the potential lost revenue if last bill not paid
- How many days of usage occur before shutoff?
 - Usage before cutoff (days) / billing period (days) = (X + Y + Z) / X
 - Where: meter read at X days + Y days to pay bill + Z days to cut-off date

Collections Policy

- When are bills due? When are bills late?
- Fees for non-payment
- When utility service is shut off and fees for shut off

Consequences of lack of enforcement

- Lost revenue
- Loss of trust with customers

Implementation

- Enforce, but plan for a certain percentage of lost collections
- Payment plans; mobile and/or online bill-pay; external Customer Assistance Programs (CAPs)
- [NC Debt Set-off Program](#) (free)

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#5 Ongoing Budget Discussions with the Board

- Governing boards should require financial updates at least quarterly.
 - Monthly preferred
 - Analysis & report by finance officer
- Budget monitoring includes:
 - Track revenues and actual expenses throughout the year
 - Note all actual expenses by line item, provide year-to-date expenditure.
 - Calculate year-to-date % expended for each line item
- Post updates to a dashboard (optional)
- Connecting the dots
 - Request the town manager or utility director provide a summary of activities / achievements for the report period.

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#7 *Oversee and Understand Financial Audits*



Ensure proper cut-off period for revenues and expenses



Revenues Accrued: Record revenues billed but not yet received in current period



Expenses Accrued: Record expenses incurred but not yet paid in current period



Move **pre-paid expenses** to pre-paid expense accounts when they relate to future periods



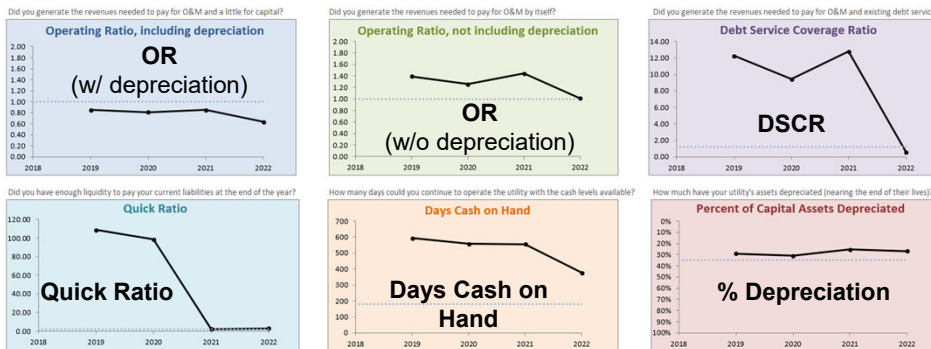
Move revenues collected for future periods to **deposit** accounts

Icon sources: Flaticon ([calendar](#) by apien)

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#7 *Oversee and Understand Financial Audits*

Financial Health Check Up Tool: Outputs



UNC SOG Environmental Finance Center

<https://efc.sog.unc.edu/tools/>

Slide Credit: Adapted from the UNC School of Government Environmental Finance Center

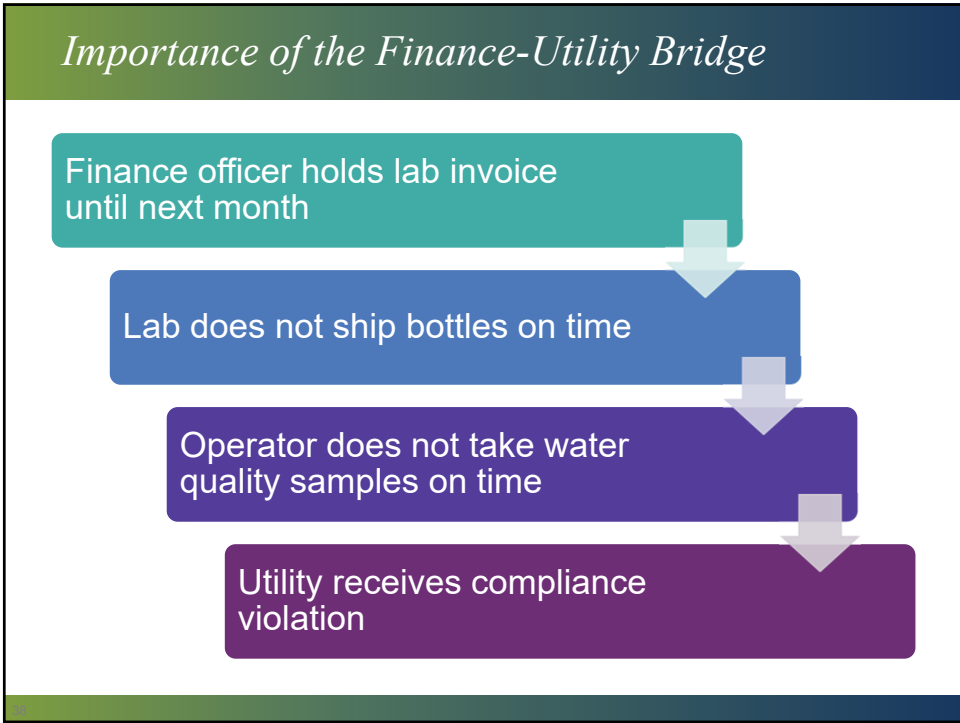
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Partnership and Cooperation Opportunities

	Range of regional cooperation & partnership arrangements	Bulk water or wastewater agreements, emergency interconnections ILAs, mutual aid, joint services, shared staff Regional management entity, regional authority or district, mergers
	Improve, reliability, resilience, economies of scale, capacities	More efficient use of capital Improved compliance support through access to better technical and managerial expertise Greater ability to plan
	NCWaterWARN	https://www.ncwaterwarn.org/ voluntary statewide mutual aid network
	SOG EFC Water and Wastewater Regionalization Study	https://ncfinanceconnect.com/water-and-wastewater-regionalization-study/ Directed by the General Assembly (S.L. 2025-77)

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Strategies to Strengthen the Finance-Utility Bridge

1

Learn your enterprise

- Schedule a plant tour
- Ask your operator what they need and what they received last budget cycle. How big is the gap?

2

Close the loop

- Pull your last rate study
- Is your CIP integrated into your budget process?
- Are your rates covering full costs including reserves?

3

Stay open to partnerships

- Your neighboring utilities face the same pressures
- Opportunities for shared resources, ILAs, or more?
- Cooperation is strategy, not weakness

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Resources: UNC SOG EFC Tools & Dashboards

<https://efc.sog.unc.edu/tools/>
<https://efc.sog.unc.edu/dashboards/>

- **Financial Sustainability Tools**
 - Water and Wastewater Rates Analysis Model
 - Financial Health Check-Up Tool
- **Benchmarking Dashboards**
- **Regionalization Tools**
- **Loan Estimation Tools**
- **Revenue Assessment Tools**
- **And more!**

Snapshot: Comparison to the targets in FY2025

Operating Ratio (including depreciation)	95%
Operating Ratio (not including depreciation)	100%
Debt Service Coverage Ratio	1.2x
Quick Ratio	1.5x
Days Cash on Hand	30 days
Percent of Capital Assets Depreciated	15%

Financial Health Check-Up Summary Output

Did you generate the revenues needed to pay for O&M and a little for capital?

Did you generate the revenues needed to pay for O&M by itself?

Did you generate the revenues needed to pay for O&M and existing debt service?

Do you have enough liquidity to pay your liabilities due at the end of the year?

How many days could the utility operate with the cash levels available?

How much have your assets depreciated (reached the end of their useful life)?

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Slide Credit: Adapted from the UNC School of Government Environmental Finance Center

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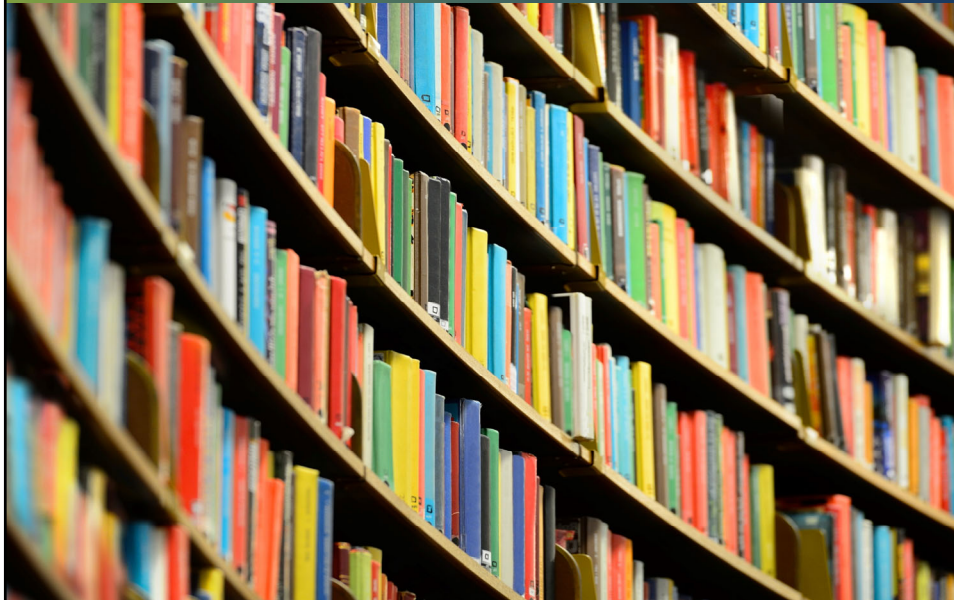
More Resources

- **NC's Statewide Water and Wastewater Infrastructure Master Plan: The Road to Viability (2017):** <https://www.deq.nc.gov/water-infrastructure/statewide-water-and-wastewater-infrastructure-master-plan-2017/download?attachment>
- **I Need Funding | NC DEQ DWI:** <https://www.deq.nc.gov/about/divisions/water-infrastructure/i-need-funding>
 - Asset Inventory and Assessment (AIA) grants: <https://www.deq.nc.gov/about/divisions/water-infrastructure/i-need-funding/asset-inventory-and-assessment-grants>
- **VU Program | NC DEQ:** <https://www.deq.nc.gov/about/divisions/water-infrastructure/viable-utilities>
- **Technical Assistance (TA) providers**
 - Environmental Finance Center Network (EFCN): efcnetwork.org | NCRWA: ncrwa.com | SERCAP: sercap.org | UNC SOG EFC: efc.sog.unc.edu
- **UNC SOG Environmental Finance Center (UNC SOG EFC) resources:** efc.sog.unc.edu
 - Rates Dashboards: <https://efc.sog.unc.edu/dashboards/>
 - Tools: <https://efc.sog.unc.edu/tools/>
 - Listservs: <https://efc.sog.unc.edu/listserv/>
- **NC Finance Connect (UNC SOG):** <https://ncfinanceconnect.com/>
- **NCWaterWARN:** <https://www.ncrwa.org/nc-waterwarn.html>
- **Affordability and Customer Assistance Program (CAP) resources:**
 - <https://efc.sog.unc.edu/program-area/affordability-and-equity/>
 - <https://uswateralliance.org/how-water-utility-customer-assistance-programs-can-help-build-resilient-healthy-communities/>
- **Local Government Commission**
- **NC Regional Council of Government (COG)**
- **NC League of Municipalities (NCLM)**

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Reference Slides






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<i>Distressed LGU – Statutory Requirements</i>		Reference
	Statutory Requirement	Available Resources
 AIA and Rate Study	Perform an Asset Inventory and Assessment that results in a Capital Improvement Plan (10-year minimum) to inform a Rate Study . May lead to a Merger and Regionalization Feasibility (MRF) study.	VUR Study Grants can fund a study of any one or more of the following: <ol style="list-style-type: none"> a. Rates (Rate Study) b. Asset inventory and assessment (AIA) c. Merger and regionalization options (MRF)
 Training	Participate in a training and educational program for governing board, utility managers, finance directors, and operating staff. <ul style="list-style-type: none"> • a.k.a. Best Utility Management Practices (BUMP) Training Completion of BUMP Training is required to access VUR Construction funding.	BUMP Training: (A) Free <u>in-person</u> training by DWI in the spring and fall. <i>Upcoming dates:</i> <ul style="list-style-type: none"> • First couple of weeks in September 2025 (B) <u>On-demand</u> training (\$72+tax) via NCLM . VUR Training Grants for distressed units cover registration fees and mileage to/from utility-specific training coordinated/offered by DWI, DST (LGC), and RAPWU partners.
 Short-Term Action Plan	Develop (and iterate on) a Short-term Action Plan (STAP) to identify and outline immediate steps necessary for the LGU to address technical, managerial, and financial (TMF) issues and reasons for being designated distressed.	Direct DWI assistance via comprehensive Status Report to facilitate the generation of a STAP.

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<i>Distressed LGU – Statutory Requirements</i>		Reference
	Statutory Requirement	Available Resources
 Long-Term Action Plan	Develop an Action Plan , considering: <ul style="list-style-type: none"> • Short- and long-term infrastructure repair, maintenance, and management (STAP and LTAP) • Continuing education of governing board and operating staff including how to send new staff to initial BUMP training • Long-term financial management that facilitates reliable water or wastewater services • Any other matters identified by DWI or the LGC 	Long-term plan (i.e., “Long-Term Viability Plan” or LTVP) combines the long-term action and financial management plans into a single document and is developed through the Rate Study, AIA, MRF, and other plans such as CIPs and Master Plans. Includes budgeting for continued education, establishes the frequency and reasons for updating the AIA and rate study, and effectively ties together the utility’s planning efforts into a road map for improving and maintaining viability.
 Continuing Education		Direct DWI and resource partner technical assistance available.
 Long-Term Financial Mgmt.	Long-term financial management to ensure sufficient revenue for O&M, personnel, maintenance, and reinvestment .	VUR Construction Grants for eligible projects.

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Distressed Unit Identification Criteria
Reference

The State Water Infrastructure Authority (SWIA) and Local Government Commission (LGC) adopted the following Identification Criteria to be used to identify distressed units:

Code	Criteria	Definition
D1	LGC fiscal control	A unit whose fiscal affairs are under the control of the Commission pursuant to its authority granted by G.S. 159-181 ("under Commission fiscal control"), or
D2	2+ years late audits	A unit that has not submitted its annual audits for the last two (2) fiscal years to the Commission as required by G.S. 159-34, or
D3	Score \geq 9	A unit with a total Assessment Criteria score that equals or exceeds nine (9) points, or
D4	Other	A unit for which other information is available to or known by the Authority or Commission that reflects and is consistent with, but does not expressly appear in, the Assessment Criteria to account for situations in which the Assessment Criteria score does not wholly or accurately reflect a system's level of risk due to the limitations of available data.

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Criteria definitions (1 of 4)
Reference

Parameter	Total Possible Points	Description	Data Source
Service Population	1	Identifies smaller systems. Point scored for systems serving less than 10,000 people.	Varied
Debt Service Coverage Ratio (DSCR)	1	Measures unit's ability to cover loan payments after paying for day to day operations. Measured by looking at revenue, expenses, and loan payments (principal and interest). Calculated as (Operating revenues-operating expenses excluding depreciation) / (principal + interest payments) Point scored if value is less than (<) 1.1.	Calculated from LGC audit data
Transfers Out	1	May indicate that revenue generated by the utilities is not being used for utility expenses. Point scored when money is transferred out of the system's dedicated utility fund in 2 or more (\geq 2) of the last 5 fiscal years if the system also has a negative surplus in the fiscal year of the transfer, or if the system has no debt and there is a negative surplus with debt service for a \$1 million "test" project.	Calculated from LGC audit data
Transfers In	1	Indicates that the system is not generating enough money to cover expenditures. Point scored when money is transferred into the primary water/sewer fund from other sources in 2 or more (\geq 2) of the last 5 years.	Calculated from LGC audit data

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Criteria definitions (2 of 4)			Reference
Parameter	Total Possible Points	Description	Data Source
Surplus (deficit) w/ Debt	2	Identifies systems that are not generating enough revenue to cover expenditures including debt payments. Points scored when number is less than or equal to (\leq) \$0, indicating insufficient funds to cover expenses. Calculated as Operating Revenues-((Operating Expenses -Depreciation) + Long-term Debt Service)	Calculated from LGC audit data
No Debt DSCR Test	1	Similar to the DSCR calculated above but includes \$1 million "test" project if system has no debt to evaluate the unit's ability to finance a simple project with a loan. Point scored if less than ($<$) 1.1.	Calculated from LGC audit data
% Depreciated	1	Evaluates the financial impact of wear and tear on water and sewer assets as they age and how much service life is left. Point scored if greater than ($>$) 50%.	Calculated from LGC audit data
Operating Margin	1	Indicates the system's ability to generate enough revenue to cover operating expenses including depreciation. Point scored if the operating margin is less than ($<$) 0. Calculated as (Operating Revenue - Operating Expenses) / Operating Revenue	Calculated from LGC audit data
Quick Ratio	1	Indicates whether a system is able to meet short-term financial obligations with cash or easily accessible funds by comparing current assets to liabilities. Point scored if less than ($<$) 1.1.	Calculated from LGC audit data
Receivables Ratio	1	Measures how well the system is collecting money from customers. Point scored for 3-year average greater than or equal to (\geq) 2.3 or if there is an increase of greater than or equal to (\geq) 0.2 in each of the last two years, which demonstrates a declining trend in bill payment.	Calculated from LGC audit data
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Criteria definitions (3 of 4)			Reference
Parameter	Total Possible Points	Description	Data Source
Afford-ability	1	Recognizes a service area's population change rate, poverty rate, median household income (MHI), unemployment rate, and property valuation per capita to established state benchmarks. Note that the benchmark values are updated every year. <u>Current Benchmarks:</u> <ul style="list-style-type: none"> Population change: 4.48% Poverty rate: 13.2% MHI: \$69,904 Unemployment rate: 3.49% Property valuation per capita: \$155,992 Point scored if 4 or 5 (≥ 4 out of 5) of these indicators are worse than the state benchmark.	NC Office of State Budget & Management, American Community Survey 5-Year Estimates (Census Bureau), Employment Security Commission, and Dept. of Revenue
UAL Control Issues	3	The UAL is published by LGC staff and identifies units whose audits indicate that they may have financial or fiscal management issues contributing to financial risk. Points are scored if a unit's UAL "Internal Controls" category score exceeds the established category score threshold set by the LGC staff for that category.	LGC
Rates	1	High rates indicate that a system is unlikely to be able to increase rates to improve revenue. The scoring threshold is based on the 85th percentile of monthly bill for inside customers for 5,000 gallons for the corresponding type of system (combined water and wastewater, water only, wastewater). For 2025, point scored when inside rates for 5,000 gallons are greater than the 85 th percentile benchmarks: >\$131/month for combined water and sewer service; >\$70/month for water service only; and >\$77/month for wastewater service only.	EFC
Revenue Outlook	4	Reflects unit's ability to generate income in the future while recognizing affordability issues. Points scored when the system has high rates (see above) AND declining population.	EFC rates; source of population varies
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<i>Criteria definitions (4 of 4)</i>			Reference
Parameter	Total Possible Points	Description	Data Source
DW Compliance	1	Identifies units with DW system compliance issues. Point scored if system has greater than (>) 5 MCL violations and/or Action Level Exceedances in a 5-year period or has ongoing treatment technique violations (>0).	NC DEQ-DWR
WW / CS Compliance	1	Identifies units with wastewater treatment or collection system compliance issues. <ul style="list-style-type: none"> • WW: Point scored if either in the top 10% for number of violations in a 5-year period, or a combination of in the top 20% for number of violations in a 5-year period and more than 50% of inspections document violations for wastewater treatment operations. • CS: Point scored if either the following occur: <ul style="list-style-type: none"> ○ The system is in the top 10% of systems for the number of SSO violations in a 5-year period and the top 20% for the number of SSOs per mile of collection system, or ○ The system is in the top 20% of systems for the number of SSO violations in a 5-year period and the top 10% for the number of SSOs per mile of collection system. 	NC DEQ-DWR
Flow Moratorium	4	Points scored when the system is under a moratorium preventing service expansion due to inability to treat wastewater or because the system has reached 90% of permitted capacity.	NC DEQ-DWR