

**BURNS, DAY & PRESNELL, P. A.**

ATTORNEYS AT LAW  
2626 GLENWOOD AVENUE, SUITE 560  
RALEIGH, NORTH CAROLINA 27608

KENDRA K. BADER  
JAMES M. DAY  
DANIEL C. HIGGINS  
ANDREA L. HINSHAW  
GREG L. HINSHAW  
EMILY D. IVERSON  
JULIA Y. KIRKPATRICK  
JAMES J. MILLS

MAILING ADDRESS:  
POST OFFICE BOX 10867  
RALEIGH, NORTH CAROLINA 27605

TELEPHONE (919) 782-1441  
FACSIMILE (919) 782-2311  
www.burnsdaypresnell.com

August 30, 2023

\_\_\_\_\_  
LACY M. PRESNELL III - *RETIRED*  
F. KENT BURNS (1929 – 2022)

Ms. A. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, North Carolina

Re: Transfer of Total Environmental Solutions, Inc. to Red Bird Utility Operating  
Company, LLC (“Red Bird”)  
Docket Nos.: W-1328, Sub 10 and W-1146, Sub 13

Dear Ms. Dunston:

Pursuant to the Order Scheduling Hearings, Establish Discovery Guidelines, And  
Requiring Notice issued in these dockets, enclosed find Red Bird’s Objections and Responses to  
Public Staff’s 17<sup>th</sup> Set of Data Requests.

As always, please do not hesitate to contact me if you or the Commission have any  
questions regarding this filing.

Sincerely yours,

BURNS, DAY & PRESNELL, P.A.



Daniel C. Higgins

Email: dhiggins@bdppa.com

DCH/krs  
Enclosures  
cc: Public Staff (w/encl.)  
TESI (w/encl.)  
Red Bird