

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. A-41, Sub 22

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Joint Application of Bald Head Island)	
Transportation, Inc., Bald Head Island)	
LLC, and Bald Head Island Ferry)	MOTION OF THE PUBLIC STAFF
Transportation, LLC, for Approval of)	FOR SUBSTITUTION OF
Transfer of Common Carrier Certificate)	WITNESS AND ADOPTION OF
to Bald Head Island Ferry)	TESTIMONY
Transportation, LLC, and Permission to)	
Pledge Assets)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, and respectfully moves the North Carolina Utilities Commission (Commission) to substitute Michelle Boswell as the joint sponsor of the prepared direct Joint Testimony and Exhibit and the Amended and Supplemental Joint Testimony and Exhibit previously filed on behalf of joint witness Sonja Johnson in this proceeding and to allow Ms. Boswell to adopt the testimony of Ms. Johnson. In support of this motion, the Public Staff respectfully shows the Commission the following:

1. On July 14, 2022, Bald Head Island Transportation, Inc. (BHIT), and Bald Head Island Ferry Transportation, LLC (BHIFT) (collectively with BHIT, the Applicants), a wholly owned subsidiary of Pelican Legacy Holdings, LLC (Pelican), and managed by SharpVue Capital, LLC (collectively with Pelican, SharpVue), filed pursuant to N.C. Gen. Stat. § 62-111 for approval: (1) to transfer to BHIFT BHIT's Common Carrier Certificate to operate the passenger ferry transportation services to

and from Bald Head Island and the tram services on the island; and (2) for BHIFT or SharpVue to pledge assets and borrow/issue debt pursuant to N.C.G.S. §§ 62-160 and 62-161 as may be necessary to finance the transaction (the Application).

2. On August 24, 2022, the Commission issued its Order Scheduling Hearing, Establishing Procedural Deadlines, and Requiring Public Notice (Scheduling Order) setting November 30, 2022, as the deadline for, among other things, the Public Staff and other intervenors to file their direct testimony and exhibits, and December 14, 2022, as the deadline for parties to file rebuttal testimony.

3. On November 23, 2022, the Public Staff filed a motion for extension of time to file testimony of the Public Staff and intervenors to December 14, 2022, which was granted by Commission order on November 28, 2022. On December 14, 2022, pursuant to the Commission's November 28, 2022 Order, the Public Staff filed public and confidential versions of the Joint Testimony and Exhibit of Sonja R. Johnson, Krishna K. Rajeev, and John R. Hinton.

4. On January 20, 2023, the Commission issued an Order Rescheduling Hearing and Establishing Additional Procedures, which required the Public Staff and intervenors to file their amended or supplemental direct testimony and exhibits on or before February 20, 2023.

5. Pursuant to the Commission's Order, the Public Staff filed on February 20, 2023, public and confidential versions of its Amended and

Supplemental Joint Testimony of Sonja R. Johnson, Krishna K. Rajeev, and John R. Hinton.

6. Ms. Johnson is presently on leave and will be unable to be present and serve as a Public Staff witness at the expert witness hearing of this matter.

7. In light of Ms. Johnson's inability to attend and testify at the expert witness hearing on March 7, 2023, the Public Staff requests to substitute Ms. Michelle M. Boswell, Director of the Public Staff's Accounting Division, as a joint witness in Ms. Johnson's stead. Ms. Boswell was directly involved in the original preparation of the Joint Testimony and the Amended and Supplemental Joint Testimony, is familiar with and agrees with their analyses and conclusions, and has agreed to adopt Ms. Johnson's portions of the Joint Testimony and Amended and Supplemental Joint Testimony, as filed, for purposes of the hearing in this matter.

8. The Public Staff therefore seeks authorization to substitute Ms. Boswell for Ms. Johnson at the hearing of this matter and for leave for Ms. Boswell to adopt Ms. Johnson's prefiled direct Joint Testimony and the Amended and Supplemental Joint Testimony.

9. Inasmuch as the adoption of the joint testimonies referenced herein reflect no substantive changes to the Public Staff's prefiled direct Joint Testimony and Amended and Supplemental Joint Testimony, the Public Staff submits that no party will be prejudiced by the relief requested herein.

10. The Public Staff has contacted counsel for the Applicants and all intervenors and is authorized to represent that the Applicants and intervenors do not object to the relief requested herein.

WHEREFORE, for the reasons set forth above, the Public Staff respectfully requests that Michelle Boswell be substituted as a joint sponsor of the prepared direct Joint Testimony and Exhibit and the Amended and Supplemental Joint Testimony and Exhibit previously filed on behalf of joint witness Sonja Johnson in this proceeding and be permitted to testify in place of Ms. Johnson at the hearing of this matter.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Lucy E. Edmondson
Chief Counsel

Electronically submitted
/s/ William E. H. Creech
Staff Attorney

4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110
Email: zeke.creech@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Motion on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 1st day of March, 2023.

Electronically submitted
/s/ William E. H. Creech