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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
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, I file the attached Objections and Responses to Public Staff's 13th Set of Data Requests on behalf of Red Bird Utility Operating Company, LLC.

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

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