PUBLIC VERSION

EXHIBIT F TO RESPONSE IN OPPOSITION TO COMPLAINANT'S MOTION FOR PRELIMINARY INJUNCTION - A-41 SUB 21

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. A-41, SUB 21

VILLAGE OF BALD HEAD ISLAND,)	
Complainant,)	
)	DIRECT TESTIMONY OF
v.)	DR. JULIUS A. WRIGHT
)	ON BEHALF OF
BALD HEAD ISLAND TRANSPORTATION,)	VILLAGE OF BALD HEAD
INC., BALD HEAD ISLAND LIMITED, LLC,)	ISLAND
and SHARPVUE CAPITAL, LLC)	
Respondents.)	

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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. A-41, SUB 21

Direct Testimony of Dr. Julius A. Wright

On Behalf of the Village of Bald Head Island

August 9, 2022

1		I. <u>INTRODUCTION AND PURPOSE</u>
2		
3	Q.	PLEASE STATE YOUR NAME, OCCUPATION, TITLE AND BUSINESS
4		ADDRESS.
5	A.	Julius A. Wright, Managing Partner, J. A. Wright & Associates, LLC, 6 Overlook
6		Way, Cartersville GA, 30121. I am a consultant to regulated utilities and regulatory
7		agencies and other public bodies on issues related to economics, economic
8		modeling, regulatory policy, industry restructuring, demand-side investments, and
9		resource planning.
10	Q.	ON WHOSE BEHALF ARE YOU SUBMITTING THIS DIRECT
11		TESTIMONY?
12	A.	I am submitting this Direct Testimony on behalf of the Village of Bald Head Island
13		(the "Village").
14	Q.	PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL
15		FXPERIENCE

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as an unregulated parking facility separate and apart from the still regulated ferry operations will result in an unregulated, monopoly ferry parking enterprise. Such an outcome would likely result in increased parking rates, potentially to unreasonable levels with ferry system riders having no alternative parking or other readily available option and thus being forced to either pay the exorbitant parking fees, or don't go to the Island—a rather daunting proposition for the residents of the Island.

Finally, I am aware that in its Response, Motion to Dismiss, and Answers filing in this proceeding⁸¹ Limited and BHIT claim that, "Hypothetically, if the Commission were to consider parking and barge operations to be part of the regulated ferry service . . . , the appropriate time to revisit these issues is in the next rate case, so that the cost of service of the operations and rate of return on all associated assets could be considered in setting reasonable rates." However, this claim is illogical and unfair given the current circumstances. Limited and BHIT are in the process of selling the parking facilities and barge. It would be unfair to a purchaser to proceed with said purchase without the purchaser knowing whether they are buying a competitive or regulated company. Also, it is illogical to proceed with the sale and assume that once the assets are no longer in possession of Limited that in some future BHIT (or BHIT's successor's) rate proceeding that the NCUC can unwind history and claim regulatory control over these long-sold assets. The only logical and fair time to determine whether the parking service is an ancillary service necessary to support the regulated ferry operations is prior to the disposal

⁸¹ This proceeding, filing dated March 30, 2022, p. 22-23.

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- of these parking assets. The same logic applies to the barge assets.
- 2 Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?
- 3 A. Yes.