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September 9, 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 15th Set of Data Requests.

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

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Sep 11 2023