

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. A-41, Sub 22

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

<p>In the Matter of Joint Application of Bald Head Island Transportation, Inc., and Bald Head Island Ferry Transportation, LLC, for Approval of Transfer of Common Carrier Certificate to Bald Head Island Ferry Transportation, LLC, and Permission to Pledge Assets</p>	<p>)))))))</p>	<p>MOTION OF THE PUBLIC STAFF FOR EXTENSION OF TIME TO FILE DIRECT TESTIMONY AND REBUTTAL TESTIMONY</p>
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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 extend the deadline for the Public Staff and other intervenors to file direct testimony and the time within which the Applicants file their rebuttal testimony. 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 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. Due to the need to thoroughly complete review of and understand the more complex transaction structure proposed in the Application, which involves issues of multi-level ownership, management, and control, and the press of other matters currently pending before the Commission, the Public Staff requires additional time to prepare its direct testimony and exhibits on the Application.

4. The Public Staff therefore requests that the Commission grant an extension to and including December 14, 2022, for the Public Staff and other intervenors to file direct testimony and exhibits on the Application, and an extension to and including January 4, 2023, for parties to file rebuttal testimony.

5. 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 proposed extension.

WHEREFORE, the Public Staff respectfully requests that the Commission issue an order extending the deadline for filing direct testimony and exhibits to December 14, 2022, and extending the deadline for filing rebuttal testimony to January 4, 2023.

This the 23rd day of November, 2022.

PUBLIC STAFF
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Electronically submitted
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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 23rd day of November, 2022.

Electronically submitted
/s/ William E. H. Creech