STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

Docket No. A-41, Sub 22

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 Pladge Assets	BALD HEAD ISLAND TRANSPORTATION, INC.'S OBJECTION TO VILLAGE OF BALD HEAD ISLAND'S FIRST DATA REQUESTS
Permission to Pledge Assets)

- 1. Intervenor Village of Bald Head Island (the "Village") served its First Data Requests (the "Requests") to Applicant Bald Head Island Transportation, Inc., ("BHIT") on August 25, 2022.
- 2. Among other things, the Requests asked BHIT to produce an unredacted copy of Exhibit F to the Application. Exhibit F contains confidential information relating to the financing of the transaction at issue in this docket.
- 3. BHIT has proposed a confidentiality agreement to the Village and other Intervenors. While the other Intervenor has agreed to the proposed confidentiality agreement, the Village has yet to do so.
- 4. BHIT will continue to attempt to resolve the issue with the Village in a cooperative manner that may avoid the need for the Commission's intervention but files this objection in order to timely preserve its objection.

Respectfully submitted this the 6th day of September, 2022.

FOX ROTHSCHILD LLP

/s/Elizabeth Sims Hedrick

M. Gray Styers, Jr.
David T. Drooz
Elizabeth Sims Hedrick
Fox Rothschild LLP
434 Fayetteville Street, Suite 2800

Telephone: (919) 755-8700

E-mail: gstyers@foxrothschild.com
E-mail: ddrooz@foxrothschild.com
E-mail: ehedrick@foxrothschild.com

Counsel for Bald Head Island Transportation, Inc.

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served the foregoing document upon all parties of record by electronic mail and/or depositing the same with the United States Postal Service, first class postage prepaid, addressed as follows:

David Ferrell Nexsen Pruet, PLLC 4141 Parklake Avenue, Suite 200 Raleigh, NC 27612

E-Mail: <u>dferrell@nexsenpruet.com</u>

Bald Head Island Association P. O. Box 3030 Bald Head Island, NC 28461 E-Mail: bhinews@bellsouth.net

Craig D. Schauer
Brooks, Pierce, McLendon,
Humphrey & Leonard LLP
P. O. Box 1800
Raleigh, NC 27602
E-Mail:
cschauer@brookspierce.com

Edward S. Finley Jr. 2024 White Oak Road Raleigh, NC 27608

E-Mail: edfinley98@aol.com

Lee Harris Roberts Bald Head Island Ferry Transportation, LLC 3700 Glenwood Avenue, Suite 530 Raleigh, NC 27612 Marcus W. Trathen Brooks, Pierce, McLendon, Humphrey & Leonard,LLP P. O. Box 1800 Raleigh, NC 27602

E-Mail: mtrathen@brookspierce.com

Jo Anne Sanford Sanford Law Office, PLLC P. O. Box 28085 Raleigh, NC 27611-8085

E-Mail: sanford@sanfordlawoffice.com

William E. H. Creech Public Staff - N. C. Utilities Commission 4326 Mail Service Center Raleigh, NC 27699-4300 E-Mail: zeke.creech@psncuc.nc.gov

Elizabeth D. Culpepper
Public Staff - NC Utilities Commission
4326 Mail Service Center
Raleigh, NC 27699-4300
E-Mail:
elizabeth.culpepper@psncuc.nc.gov

/s/Elizabeth Sims Hedrick

Elizabeth Sims Hedrick Fox Rothschild LLP 434 Fayetteville Street, Suite 2800 Telephone: (919) 755-8700

E-mail: ehedrick@foxrothschild.com

Counsel for Bald Head Island Transportation, Inc.