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October 21, 2021

TP-190976

**VIA WEB PORTAL AND EMAIL**

Mark L. Johnson  
Rayne Pearson  
Howard Michael  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

Received  
Records Management  
10/21/21 11:46:32  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Re: Docket TP-190976  
**Request for extension of time to file request for leave to file reply**  
*TOTE Maritime Alaska, LLC's Petition for Amendment, Recission, or Correction of Order 09 in WUTC Docket 190976*

Dear Sirs and Madam:

On behalf of my client TOTE Maritime Alaska, LLC ("TOTE"), I write to request a three-week extension of TOTE's time to request leave to file a reply in further support of its petition. Responsive briefing from Staff and Puget Sound Pilots ("PSP") was filed on October 15, 2021. Under WAC 480-07-825(d)(iii), a "petitioner must file its reply or a petition for leave to reply no later than five days after the respondent submits its response. The commission may extend the time on a showing of good cause." Under WAC 480-07-825(d)(iii), the reply itself must be filed with the request for leave to file it. By that schedule, TOTE would have to file its request for leave and the reply itself by tomorrow.

Good cause exists to extend TOTE's deadline to file its request for leave to file the reply. Briefing from PSP and Staff was very extensive and raised numerous issues, legal arguments and factual considerations. The Pacific Merchant Shipping Association also filed response briefing. TOTE reasonably requests adequate time to consider points it might like to raise in a reply to these three response briefs, and submit them for the Commission's consideration. Accordingly, TOTE requests until November 12, 2021 to file its request for leave to file the reply along with the proposed reply.

Mark L. Johnson  
Rayne Pearson  
Howard Michael  
October 21, 2021  
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Very truly yours,

A handwritten signature in cursive script, appearing to read "Steven Block".

Steven Block