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January 4, 2021

SENT VIA WEB PORTAL

Mr. Mark Johnson
Executive Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: *WUTC v. Discover Lake Chelan LLC d/b/a Lake Chelan Boat Company*
Docket TS-200969
Comments of Public Counsel on Tariff Revisions

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in advance of the January 7, 2021 Open Meeting. These comments are in response to Discover Lake Chelan LLC d/b/a Lake Chelan Boat Company's ("Company") general rate case filing.

Public Counsel has reviewed the filing and the Company's past filings. Public Counsel has also discussed the matter with Commission Staff. Based on the comments below, we believe that the rate increase requested by the Company is reasonable and should be approved with the condition that the Company provide a compliance filing in three years, as suggested by Staff.

Recommendation: Public Counsel recommends that the Commission approve the requested tariff changes with the condition that the Company provide a compliance filing in three years, as suggested by Staff.

1. The Company has experienced a dramatic drop in ridership and increased expenses due to public health measures to address the COVID-19 pandemic. Public Counsel notes that the Company has made several filings this year to alter schedules and adapt to the changing circumstances of this year. We appreciate the Company's efforts to keep the Commission and the public informed.
2. Public Counsel notes that although the tariff revision increases passenger fares by 6.3 percent, the Company is also proposing to expand service to customers by offering additional runs on the mid-sized and smallest fleet vessels.

ATTORNEY GENERAL OF WASHINGTON

To: Mr. Mark Johnson, Executive Secretary

Re: Docket TS-200969, Discover Lake Chelan LLC d/b/a Lake Chelan Boat Company Tariff Revision

January 4, 2021

Page 2 of 2

3. Because the changes brought by the COVID-19 pandemic are so unusual, we believe that a compliance filing from the Company is an important requirement. The compliance filing will allow reevaluation of the rate structure in light of updated ridership numbers and the authorized rate of return. Public Counsel has no objections to the three-year time frame recommended by Commission Staff.

Public Counsel appreciates the opportunity to submit these comments. Stephanie Chase, Public Counsel Regulatory Analyst, will be present at the January 7, 2021 Open Meeting and available to answer any questions the Commission may have regarding these comments.

Thank you.

Sincerely,

/s/ Stephanie K. Chase

Stephanie K. Chase

Regulatory Analyst

Public Counsel Unit

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SKC/KMB

Enclosures