**TS-220588** 

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## WILLIAMS KASTNER



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August 16, 2022

## VIA WEB PORTAL

Ms. Amanda Maxwell Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE P.O. Box 47250 Olympia, Washington 98504-7250

Attn: Mike Young

Re: TS-220588, Arrow Launch Service Inc., BC-97

Dear Ms. Maxwell:

Please consider the below a request for exemption under WAC 480-07-110 by Arrow Launch Service, Inc. ("Arrow") seeking an extension, pursuant to the LSN Order served August 11, 2022 and the ruling that expressly authorizes requests by Petitioner Arrow to "reapply to retain or amend" the surcharge after the expiration date. By this request, Arrow is asking the Commission to formally extend the expiration date of its special surcharge in Tariff Supplement No. 7 from the current date of September 12, 2022, to September 30, 2022.

The regular first Thursday Open Meeting in September will actually not occur until September 15 because of the anomalies of the calendar with September containing five Thursdays. This schedule will not allow Arrow to compile all August fuel invoices nor secure relief from fuel costs at the 30-day expiration point of September 11, 2022. Therefore, Arrow is requesting a waiver of the 30-day fuel surcharge expiration date and grant of an additional 18 days until month's end to apply the current surcharge approved on August 11 by the LSN Order. Arrow notes that granting this exemption would allow it to compile the full previous calendar month's fuel receipts and accordingly calculate a full month's average fuel cost. It would also enable Arrow to timely file its next fuel surcharge with the Commission by the time prescribed by rule under 480-07-900(5)(b) in order for the Commission to act on the request at its September 29 Open Meeting. This in turn would enable consistent calendar month invoicing of any prospective fuel surcharge going forward, whose consistency would be beneficial, logical and more transparent for customers and company alike.

Therefore, Arrow respectfully asks the Commission to grant this exemption from rule and allow the current special fuel surcharge in effect to expire September 30, 2022 rather than the current date of

Williams, Kastner & Gibbs PLLC Two Union Square 601 Union Street, Suite 4100 Seattle, Washington 98101 main 206.628.6600 fax 206.628.6611 www.williamskastner.com WASHINGTON . OREGON Ms. Amanda Maxwell August 16, 2022 Page 2

September 11, 2022 and further contends its request as outlined above is fully consistent with the public interest.

Please contact me, Mr. Burton or Jack Harmon of Arrow Launch Service, Inc. with any further questions or concerns on this matter.

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David W. Wiley' dwiley@williamskastner.com (206) 233-2895