

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Cancellation of  
Commercial Ferry Certificate BC068215  
held by

LAKE UNION FERRY COMPANY, LLC.,

Pursuant to WAC 480-51-150(1)(d)

DOCKET NO. TS-230613

MOTION FOR CLARIFICATION

**I. INTRODUCTION**

1 Pursuant to WAC 480-07-825(3), Commission Staff moves for an order clarifying the Order  
Cancelling Certificate (“Initial Order”), entered in this docket on March 12, 2024. Through this  
motion, Staff seeks to clarify specific rule provisions and correct errors contained in the Initial  
Order.

**II. DISCUSSION OF POINTS FOR CLARIFICATION**

2 WAC 480-07-825(3) permits a party to seek to correct “obvious or ministerial error” in an  
initial order, so long as the party does not seek to change the substantive outcome or reasoning found  
in the order.<sup>1</sup> Here, Staff seeks clarifications and corrections of errors noted in paragraphs 1, 2, and  
5, and the header of the Initial Order. None of the requested corrections will result in a substantive  
change to the outcome of the proceeding or the reasoning employed.

3 Staff seeks correction of the entity name in paragraphs 1 and 5 of the Initial Order. Currently,  
the entity name is listed as “Edison Valley Investments LLC, d/b/a Lake Union Ferry Company  
(Edison Valley Investments or Parent Company). The company that should be referenced is Eden  
Valley Investments LLC, d/b/a Lake Union Ferry Company. Eden Valley is named as Edison Valley  
three times in paragraph 1 and once in paragraph 5. Staff requests that the Initial Order be corrected

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<sup>1</sup> WAC 480-07-825(3)(a).  
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to identify the entity actually at issue in this docket, Eden Valley Investments LLC, d/b/a Lake Union Ferry Company.

4 Staff also seeks clarification of the summary of WAC 480-51-150(1)(d) as described in paragraph 2. The current summary indicates this provision indicates cancellation where a company “fail[ed] to file an annual report after beginning operations.” This WAC provision provides a basis for cancellation where the certificate holder did file an annual report, but that report shows “no revenue in the previous twelve-month period after service has been initiated.” WAC 480-51-150(1)(d). The current description is erroneous since it wrongly states that cancellation is for failure to file an annual report, when in fact a report is filed but the company is subject to cancellation for showing zero revenue during the prior twelve months of operation, after initiating service.

5 Finally, Staff requests correction of the docket number in the header of the Initial Order. Currently, the header states “DOCKET <<Docket\_No>>”. Staff requests that this header be corrected to read “DOCKET TS-230613.”

### III. CONCLUSION

6 For the reasons set forth above, Staff respectfully requests the Commission grant this motion for clarification pursuant to WAC 480-07-825(3). Staff’s requests for clarification and correction do not alter the substantive outcome of the Initial Order, but rather correct obvious errors in the entity’s name, WAC summary, and docket number in the heading.

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Respectfully submitted this 14th day of March, 2024.

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