



September 30, 2010

VIA EMAIL to WUTC RECORDS CENTER/
ORIGINAL VIA FIRST CLASS MAIL

David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
Attention: Records Center
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

Re: Docket No. A-042090; Staff Investigation to Rescind Temporary Fuel charge

Dear Mr. Danner:

I am president of Arrow Launch Service, Inc., holder of BC-97 and write on behalf of my company to communicate my concern for the possible elimination of the temporary fuel surcharge. While our company has not regularly utilized this mechanism, it has been useful in previous years and is viewed by us as a straightforward and efficient mechanism to reflect fluctuating fuel prices in approved rates.

Our company purchases ultra low sulfur marine fuel in four ports in Washington: Port Angeles, Anacortes, Tacoma and Seattle. While our experience with the price of fuel over the last couple of years is generally consistent with the staff's memo about fuel stabilization we have very recently seen substantially escalating fuel prices after a period of decline and believe this past summer's experience of ups and downs, (but mostly ups) in fuel prices, is typical.

While general rate filings are clearly the standard mechanism to reflect various increased costs, when fuel gyrates over short periods of times, a temporary fuel supplement mechanism is in our view a more efficient measure to respond to such price increases.

We thus urge the Commission to maintain fuel surcharges as a useful ratemaking mechanism and voice our concern that any cancellation of the mechanism could detrimentally affect the provision of marine common carrier/commercial ferry services such as provided by Arrow Launch Service, Inc.

Sincerely,

Jack L. Harmon, President
Arrow Launch Service, Inc.