

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of
MEI Northwest, LLC

For a Certificate of Public Convenience
and Necessity to Operate Vessels in
Furnishing Passenger Ferry Service.

DOCKET TS-160479

PETITION TO INTERVENE OF PACIFIC
CRUISES NORTHWEST, INC.

1 COMES NOW Pacific Cruises Northwest, Inc, (“PCNW”) BC-65013, located at 355 Harris Ave., Suite 104, Bellingham, Washington 98225, and pursuant to the Notice of Prehearing Conference dated August 5, 2016, RCW 34.05.443 and WAC 480-07-355(a) and states as follows: PCNW as a certificated carrier commercial ferry company under RCW 81.84, and is authorized to transport passengers in the Puget Sound and San Juan Island areas as set forth in its certificate, attached as Exhibit A. As such, we contend we have a direct interest in the subject matter raised in the application and Prehearing Conference Notice, particularly with respect to the issue of whether overlapping commercial ferry certificates can be authorized under RCW 81.84.020.

2 As a currently authorized commercial ferry company operating under the Commission’s jurisdiction in territory partially covered by the application, PCNW asserts that it has a direct interest in this proceeding, particularly with respect to any policy issues that the Commission may consider regarding overlapping commercial ferry certification.

3 The proposed intervenor is therefore seeking and will formally request intervention status at the Prehearing Conference scheduled in this matter on September 1, 2016 and will appear then by telephone conference bridge. We urge the administrative law judge and the Commission to grant us status as a general intervenor directly affected by the outcome, contend that we will not seek to broaden the issues and will generally limit our presentation and participation to the issue of overlapping commercial ferry certificates and evaluating existing service under RCW 81.84.020.

I. SUMMARY

4 Wherefore, Pacific Cruises Northwest, Inc. expressly requests that it be granted leave to intervene in this proceeding pursuant to WAC 480-07-355, and that it consequently be allowed to participate in the development of the hearing record and in any other pre- and post- hearing stages in this proceeding.

RESPECTFULLY SUBMITTED this 24th day of August, 2016.

By: _____
Drew M. Schmidt, President
Pacific Cruises Northwest, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on 24 August 2016 I caused to be served the original and three (3) copies of the foregoing documents to the following address via first class mail:

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

I further certify that I have also provided to the Washington Utilities and Transportation Commission’s Secretary an official electronic file containing the foregoing document via the WUTC web portal;

and served a copy via email and first class mail, postage prepaid, to:

<p>Julian Beattie Assistant Attorney General Office of the Attorney General Utilities and Transportation Division 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0128 (360) 664-1192 Email: jbeattie@utc.wa.gov</p>	<p>Mr. Dan Bentson Bullivant, Houser, Bailey, PC 1700 Seventh Ave, Suite 1810 Seattle, WA 98101 Email: dan.bentson@bullivant.com</p>
<p>David W. Wiley Williams Kastner & Gibbs, PLLC 601 Union Street, Suite 4100 Seattle, WA 98101 (206) 233-2895 Email: dwiley@williamskastner.com</p>	

Dated at Bellingham, Washington this 24th day of August, 2016.
