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March 19, 2021

Mark L. Johnson, Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE, Lacey WA 98503 P. O. Box 47250 Olympia, WA 98405-7250

RE: Determining the Proper Carrier Classification of, and Complaint for Penalties Against

Cascade Adventures Inc.; Cascade Adventures Baker Bus LLC

Docket TE-190086

Dear Mr. Johnson,

Commission Staff (Staff) has reviewed the response provided by Baker Bus Ski and Snowboard Club (Company). While the Company is no longer operating as Cascade Adventures Baker Bus LLC, Staff maintains that the Company continues to operate as charter party excursion carrier without authority from the Commission and that the Commission should impose the penalty suspended in Docket TE-190086.

If the Company disagrees, then Staff requests that the Commission initiate a classification proceeding to determine whether the Company is subject to Commission regulation and that the Commission consolidate the matter regarding the suspended penalty with the classification. Given the additional information provided in the Company's response, Staff further requests that the Commission set the classification as a full adjudication to permit additional discovery.

Respectfully,

/s/ Harry Fukano, WSBA No. 52458 Assistant Attorney General Office of the Attorney General Utilities and Transportation Division P.O. Box 40128 Olympia, WA 98504-0128 (360) 664-1225 harry.fukano@utc.wa.gov Records Management