

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

DOCKET TP-190976

CROSS-EXHIBIT FOR

Weldon T. Burton

PSP Responses to PMSA DRs 66, 67, 68, 77

August 7, 2020

DATE PREPARED: March 3, 2020	WITNESS: Weldon Burton
DOCKET: TP-190976	RESPONDER: Weldon Burton
REQUESTER:	Puget Sound Pilots

DATA REQUEST NO. 66: Regarding the three-month transportation expense trial program referenced at Exh. WTB-1T, p. 9 line 5-13, please state whether any of the trial program occurred during cruise ship season, and please provide (1) copies of the receipts for the trial program's transportation expenses; (2) documentation of all transportation provided by pilots themselves versus by a transportation service and when used; and (3) documentation of the transportation services used (limo services, taxi, contract shuttle, app-based ride-share program, etc.).

RESPONSE TO DATA REQUEST NO. 66:

Objection. This request is unduly burdensome because some credit card receipts are not organized in a manner that permitted PSP to efficiently locate them. Subject to and without waiving the foregoing objection, PSP responds as follows:

The three-month transportation expense trial program began on February 1, 2019 and concluded on April 30, 2019. The cruise ship Celebrity Eclipse arrived at the Bell Street Pier Cruise Terminal at Pier 66 on April 15, 2019. Thus, this trial program did occur during the cruise ship season.

<https://www.portseattle.org/news/2019-cruise-season-launches-20-year-celebration-and-economic-impact-focus>

- 1) Copies of the receipts for the trial program's transportation are attached. There may be minor expenses for various public transportation entities charged to credit cards that have not been included with the large number of receipts provided in #2 and #3 answering this data request. If desired PSP can continue to identify additional charge card items in the test period.
- 2) Documentation of all transportation provided by pilots themselves versus a transportation service and when used are attached. Transpo Trial Pilots are the pilots individual expenses seeking reimbursement included with this response.
- 3) Documentation of the transportation services used (limo services, taxi, contract shuttle, app-based ride-share program, etc.) are attached. Various limo service, taxi, contract shuttle and app-based ride-share billing invoices are included with this response.

These responsive documents are produced with the following file labels and commence on the corresponding bates number:

- PMSA DR 66 - Chris Cook Transportation Invoices Feb-Apr 2019 to cc.xlsx; bates number PSP_003534

PUGET SOUND PILOTS' RESPONSES TO PMSA DATA
REQUESTS 56-126- 12

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, WA 98101-2380
(206) 628-6600

- PMSA DR 66 - Evergreen Town Car 2019 traspo Trial Invoices.pdf; bates number PSP_003535
- PMSA DR 66 - Fife Maritime 2019-02 to 05 traspo Trial Invoices.pdf; bates number PSP_003536
- PMSA DR 66 - Glllobal Portage Solutions 2019 traspo Trial Invoices.pdf; bates number PSP_003577
- PMSA DR 66 - Green Car Club 2019 traspo Trial Invoices.pdf; bates number PSP_003594
- PMSA DR 66 - Lyft Feb-April 2019 Transaction Reports.xlsx; bates number PSP_003598
- PMSA DR 66 - Marine & Industrial Security Services 2019 traspo Trial Invoices.pdf; bates number PSP_003599
- PMSA DR 66 - Mert's Taxi Gary Osborne 2019 traspo Trial Invoices.pdf; bates number PSP_003607
- PMSA DR 66 - Perry Cook 2019-02 to 04 traspo Trial Invoices.pdf; bates number PSP_003623
- PMSA DR 66 - Randall K. Willis 2019 traspo Trial Invoices.pdf; bates number PSP_003700
- PMSA DR 66 - RITE Bros 2019-02 to 04 traspo Trial Invoices.pdf; bates number PSP_003708
- PMSA DR 66 - Seda Markarova LLC 2019-02 to 04 traspo Trial Invoices.pdf; bates number PSP_003769
- PMSA DR 66 - Traspo Trial Pilots.pdf; bates number PSP_003803
- PMSA DR 66 - Wellington Transportation 2019 traspo Trial Invoices.pdf; bates number PSP_004168
- PMSA DR 66 - Westwind Aviation 2019 traspo Trial Invoices.pdf; bates number PSP_004171

DATE PREPARED: March 3, 2020 DOCKET: TP-190976 REQUESTER:	WITNESS: Weldon Burton RESPONDER: Weldon Burton Puget Sound Pilots
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DATA REQUEST NO. 67: Please provide documentation of the current PSP explanation provided to pilot customers regarding the transportation charges on their invoices as referenced at Exh. WTB-1T, p. 9, lines 12-13.

RESPONSE TO DATA REQUEST NO. 67:

PSP invoices vessel owners at the completion of a voyage at rates prescribed by WAC 363-116-300. One of those rates is a transportation charge for moving a pilot from a business location to the ship or return. There are 17 locations within Puget Sound where the charges apply. Attached are four sample invoices reflecting the current reference to transportation charges on the sample invoices.

See, documents with file label “PMSA DR 67 - Customer Invoices with Transportation Charges.pdf” and commencing on bates number PSP_004178.

DATE PREPARED: March 3, 2020 DOCKET: TP-190976 REQUESTER:	WITNESS: Weldon Burton RESPONDER: Weldon Burton Puget Sound Pilots
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DATA REQUEST NO. 68: Regarding enrollment in medical insurance as referenced at Exh. WTB-1T, p. 10, lines 4-8, please provide documentation of how many pilots are enrolled in the MM&P medical insurance plan; (1) how many pilots are not enrolled in the MM&P medical insurance plan; (2) how many pilots have medical insurance other than or in addition to the MM&P medical insurance plan; and (3) if any have other medical insurance, which plans they have.

RESPONSE TO DATA REQUEST NO. 68:

Objection. Overbroad. This inquiry is overbroad and largely irrelevant to the extent it would not assist the Commission in its adjudication of this proceeding. Without waiving this objection, PSP and Mr. Burton answer as follows:

- 1) In November 2019 and January 2020 there were 49 active pilots enrolled in the MM&P Health and Benefit Plan.
- 2) There is one active pilot who does not participate in the MM&P medical insurance plan.
- 3) PSP does not inquire as to how many pilots both active and retired have medical insurance other than or in addition to the MM&P medical insurance plan.
- 4) PSP does not inquire as to what other medical insurance plans, if any, the non-subscribing pilots and retired members might have.

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DATA REQUEST NO. 77: Please describe what charges constitute “Pension Other” at Exh. WTB-03, “Pro Forma Year 1” p. 2 of 4, Row Number 40, and identify the statutory basis for this expense.

RESPONSE TO DATA REQUEST NO. 77:

Objection. The request for the “statutory basis for this expense” appears to call for a legal opinion and is therefore an improper discovery request.

Subject to and without waiving the foregoing objections, Mr. Burton responds as follows:

“Pension other” is a consolidated amount of Pension expense. 1978, \$7,200 for one surviving spouse participant and “Pension, Tabler” \$69,502 for the former PSP Executive Director. Both are fixed amounts. Based on PSP’s prefiled testimony, particularly that of the actuary, Steven Diess, and Walt Tabler, however, we do not understand the reference to “statutory basis” here. Unless, as indicated, this was intended only to be argumentative. To the extent this request is simply seeking authority for incurring deferred compensation retirement expense in rates, *see generally* RCW 81.116.020, RCW 88.16.055(1); and RCW 81.116.020(4).