

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 120-164

DATE PREPARED:	June 19, 2020	WITNESS:	Capt. Michael Moore, Vice President, PMSA
DOCKET:	TP-190976		
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP DATA REQUEST NO. 163:

Please produce all documents supporting that the ports lose market share as a result of pilotage rates.

PMSA RESPONSE TO PSP DATA REQUEST NO. 163:

Objection: Overly broad and unduly burdensome; seeks disclosure of sources equally available to PSP.

Subject to and without waiving said objections, PMSA answers as follows:

This Data Request mischaracterizes Capt. Moore's testimony which did not purport a specific link between market share and pilotage rates. Rather, Capt. Moore's testimony relied on the comments of the Ports and others to demonstrate that all costs – including pilotage – matter with respect to competitiveness and contribute to marketplace conditions. Competitiveness is a key metric required to be considered when evaluating the regulation of pilotage under the Pilotage Act. All specific sources relied upon in Exhibit MM-01 are either cited directly or provided as an exhibit in PMSA's testimony.