

PACIFIC MERCHANT SHIPPING ASSOCIATION
RESPONSES TO PUGET SOUND PILOTS' DATA REQUEST NOS. 180-208

DATE PREPARED:	August 5, 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. 198:

Regarding the testimony in Exh. MM-42T. 34: 13 – 18, admit that if PMSA had not served in excess of 500 data requests, PSP would have incurred lower legal expenses in this proceeding.

PMSA RESPONSE TO PSP DATA REQUEST NO. 198:

Denied. PMSA believes its requests have been proportional to the volume of evidence PSP has filed and reasonable in light of the topics introduced in that filing where facts, evidence, justifications, opinions and other materials were omitted or missing. PMSA has no ability to ascertain whether PSP anticipated the requests in the projections and estimates of future legal expenses which were associated with the PSP tariff-setting petition which were submitted by PSP in November of 2019. PMSA presumes that PSP must have budgeted in its legal expenses for the development of the record, whether in original testimony, discovery or both. Moreover, PMSA finds that the fulsome development of a record in this new case of first impression after ratemaking had been performed for 15 years in a “black box” of rate-setting is of benefit to the public and to ratepayers and to the creation of a complete record, notwithstanding PSP’s potential for unbudgeted for additional, marginal legal fees.