

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

DATE PREPARED:	August 5, 2020	WITNESS:	Capt. Michael Moore, Vice
DOCKET:	TP-190976		President, PMSA
REQUESTER:	Puget Sound Pilots	RESPONDER:	Pacific Merchant Shipping Association, Capt. Michael Moore

PSP Data Request No. 201:

Regarding the testimony in Exh. MM-1Tr. 123: 3 – 125: 18, PMSA chose only to use a comparison created by Jacobsen that displays the charges incurred by 13,000 TEU container vessels in selected ports? Describe and document:

- (a) Why PMSA did not compare the Columbia River Bar;
- (b) Why PMSA did not compare the Columbia River Pilots?
- (c) Why PMSA did not compare Grays Harbor?
- (d) Why PMSA did not compare any vessel transiting the Fraser River?
- (e) Why PMSA did not compare any vessel transiting to Prince Rupert Sound?

PMSA RESPONSE TO PSP DATA REQUEST NO. 201:

The testimony of Capt. Moore in this section is based on the Port of Long Beach staff report, reproduced in its entirety as Exh. MM-38. This portion of Capt. Moore's testimony was provided in response to the question "Are other West Coast ports identifying the relatively high costs of pilotage in the Puget Sound when compared to their own operations?" (Exh. MM-1Tr 123:11-12). PMSA did not choose which vessels to highlight in the Port of Long Beach staff report, the Port of Long Beach staff chose that vessel. The Port of Long Beach staff report was included because the Port of Long Beach chose to compare its costs of pilotage for a standard vessel class with other pilotage grounds, the Port of Long Beach identified the Puget Sound as a competitor, and the Port of Long Beach specifically concluded that it maintained competitive advantage over the Puget Sound (amongst other competitors) in acquiring the business of ocean carrier customers as its costs of pilotage even after a significant rate increase would remain significantly lower than that of the Puget Sound.

- (a) PMSA did not author but cites the Port of Long Beach staff report that compared its pilotage rates to other competitor ports.
- (b) PMSA did not author but cites the Port of Long Beach staff report that compared its pilotage rates to other competitor ports.
- (c) PMSA did not author but cites the Port of Long Beach staff report that compared its pilotage rates to other competitor ports.
- (d) PMSA did not author but cites the Port of Long Beach staff report that compared its pilotage rates to other competitor ports.
- (e) PMSA did not author but cites the Port of Long Beach staff report that compared its pilotage rates to other competitor ports.