

BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket TP-220513

**DECLARATION OF CAPTAIN
IVAN CARLSON IN SUPPORT OF
PUGET SOUND PILOTS’
EMERGENCY MOTION**

I, Ivan Carlson, being sworn, say:

1. I am a state-licensed pilot and President of the Puget Sound Pilots (“PSP”). I make this declaration based on my own personal knowledge.
2. I was first elected as PSP President effective January 1, 2021. In light of the adverse results for PSP arising out of Order 09 issued on November 25, 2020, I considered dealing with the UTC’s rate order as my top priority as PSP President. One of the major areas of concern arising out of Order 09 was the impact of the Order on PSP callback assignments.
3. To assist PSP in addressing the callback issue, I reached out to former PSP Executive Director and General Counsel Walt Tabler and to UTC rate counsel Blair Fassburg and asked each of these lawyers to prepare a memorandum analyzing what Order 09 meant regarding callbacks, PSP’s options and next steps. Once both memoranda were received in early March 2021, I forwarded both to all members of PSP with the email that is attached as Exhibit A that noted the scheduling of two all-pilot virtual meetings.

4. After sending out this transmittal email, PSP held two all-pilot virtual meetings to discuss the callback issue. Both Mr. Tabler and Mr. Fassburg attended those meetings and responded to questions from PSP members.
5. In connection with both of my requests for analysis from Walt Tabler and Blair Fassberg, I believed I was seeking legal advice on behalf of PSP regarding the implementation of Order 09. That legal advice was confidential to PSP's officers and each of its members. At no time did PSP or its Board of Directors give any PSP member the authority to release the Tabler memorandum to PSP's major adversary in rate cases, the PMSA.
6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 30th day of March, 2023.

/s/ Ivan Carlson

Ivan Carlson