

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED:	June 23, 2020	WITNESS:	Scott Sevall
DOCKET:	TP-190976	RESPONDER:	Scott Sevall
REQUESTER:	PMSA	TELEPHONE:	(360) 664-1230

DATA REQUEST NO. 37:

Regarding Exh. SS-3, Schedule 3.4 Page 4, and Sch. 3.6, it appears that second pilot assignments are listed in the 7,033 invoices on Sch. 3.6, but these are then calculated by adding second pilot assignments to the number of assignments on Schedule 3.4 to again arrive at 7,310 adjusted number of assignments. Please confirm whether or not, and describe why or why not, if any of these assignments have been double-counted. If so, please make any adjustments that should be made in staff calculations regarding total distributable net income. In addition, please identify any adjustments that should be made regarding medical, license fees and individual business allowance for disability insurance. If there are revisions to the methodology necessary, please either include those revisions in response to this Data Request or provide notice that such revisions will be addressed in cross-answer testimony.

RESPONSE:

You are correct that there are 7,033 invoices (shown in Exh. WTB-11) and I added the number of times a second pilots was used. The reason is an invoice is a billing activity, not an assignment activity, but it records how many pilots were assigned. If I simply added the invoices up I believe it would under represent the actual number of pilot assignments.

Any adjustments made to Exh. SS-2 regarding medical insurance, license fees, etc. will also require Exh. SS-3 to be revised. I will submit an updated Exh. SS-3 reflecting any changes to staff calculations in cross answer testimony.