

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

DOCKET NO.

TP-190976

PUGET SOUND PILOTS' OBJECTIONS  
TO EXHIBITS

PSP objects to the admission of the following identified cross-examination exhibits:

| Exhibit/Party Offering  | Basis of Objection   |
|---|--|
| <p>PMSA Cross- Exh. IC-____X (Data Request Responses-Carlson Cross Exam).</p> <p>PSP objects to the admission of specific data requests contained therein:<br/>Data Request No. 116<br/>Data Request No. 497<br/>Data Request No. 537</p> | <p>PSP objected to each of the identified data requests without response. Neither the objection nor any discovery dispute should not be addressed to witnesses during the hearing.</p> |
| <p>PMSA Cross- Exh. JN-____X (Data Request Responses – Norris Cross Exam)</p> <p>PSP objects to the admission of specific data requests contained therein:<br/>Data Request No. 419<br/>Data Request No. 437</p>                          | <p>PSP objected to each of the identified data requests without response. Neither the objection nor any discovery dispute should not be addressed to witnesses during the hearing.</p> |
| <p>PMSA Cross-Exh. GQ-____X (Data Request Responses-Quick Cross Exam)</p> <p>PSP objects to the admission of specific data requests contained therein:<br/>Data Request No. 47</p>  | <p>PSP objected to each of the identified data requests without response. Neither the objection nor any discovery dispute should not be addressed to witnesses during the hearing.</p> |

PSP makes no objections to authenticity or even foundation with respect to other filed exhibits, but reserves the right to object to the use of exhibits on other grounds, including without limitation, where the DR response is not sponsored or answered by the witness being questioned, where the subject matter

exceeds the scope of the direct testimony of the witness to whom questions about exhibits are directed, or where potential parsing of voluminous supporting exhibits to data request responses originally submitted for completeness purposes is being asked of the witness.

DATED this 10th day of August, 2020.

RESPECTFULLY SUBMITTED,

By /s/ Blair I. Fassburg  
Blair I. Fassburg, WSBA # 41207  
[bfassburg@williamskastner.com](mailto:bfassburg@williamskastner.com)  
David W. Wiley, WSBA #08614  
[dwiley@williamskastner.com](mailto:dwiley@williamskastner.com)

Attorneys for Puget Sound Pilots