

BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket TP-220513

**RESPONDENT PUGET SOUND
PILOTS' MOTION FOR LEAVE TO
FILE CORRECTED TESTIMONY OF
DAVID LOUGH**

MEMORANDUM

Pursuant to WAC 480-07-460(1)(a)(i), Puget Sound Pilots ("PSP") move for leave to file changes and corrections to the testimony of PSP compensation expert David Lough. A copy of the Revised and Corrected Testimony of David Lough is attached as Exhibit A and the updated tables referenced in that testimony as Ex DL-29 as Exhibit B. As noted in that testimony, all of the changes or corrections are based upon information in the record or that is publicly available. There is therefore no prejudice to any of the parties as this information is much more efficiently addressed directly at hearing rather than introduced in answers to cross-examination of this witness's original and rebuttal testimony. Further, the updated pilot income tables prepared by Mr. Lough work to the benefit of PMSA by reducing the median income for the US pilot groups included in the predecessor tables in previously filed testimony.

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Respectfully submitted this 4th day of April, 2023.

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