



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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April 11, 2023

NOTICE OF BENCH REQUESTS
(Due by Friday, April 21, 2023, at 5 p.m.)

RE: *Washington Utilities and Transportation Commission v. Puget Sound Pilots,*
Docket TP-220513

TO PUGET SOUND PILOTS (PSP):

BENCH REQUEST NO. 1:

To Weldon T. Burton (PSP):

Referring to Exh. WTB-05 and WTB-08T:

- 1) Please provide an updated revenue requirement model reflecting the PSP's proposed rebuttal revenue requirement. This should include the effects of the updated proposed pilot DNI reflected in rebuttal testimony, and the effect of any other adjustments made or accepted in rebuttal testimony.
- 2) Please also correct the "Results of Operations" worksheet by creating four separate columns for PSP's Pro forma Adjustments, Pro forma Results, Proposed Increase, and Results at New Rates. See Staff's revenue requirement model Exh. JNS-2r "Schedule 1.1 Result of Operations" worksheet, Excel columns G through J, for an illustration of the requested separation.

BENCH REQUEST NO. 2:

To Weldon T. Burton (PSP):

Referring to your supplemental and rebuttal testimony, Exh. WTB-04T and WTB-08T, these exhibits do not appear to state the additional annual revenue requirement requested by PSP.

Specific to Exh. WTB-08T:

- 1) Please clarify, what is the additional annual revenue PSP is seeking?
- 2) Please provide the calculation using the Excel file created to respond to Bench Request No. 1 (above).
- 3) What is the additional annual revenue based on the difference between the total revenue requested in this general rate case as compared to the total revenue

authorized for Rate Year 2 approved by the Commission in PSP’s last rate case?
Please provide in the Excel file created to respond to Bench Request No. 1 (above).

4) Please also provide the additional annual revenue requested in this case using the following requested calculation (respond using the Excel file created to respond to Bench Request No. 1 (above) and link all calculated figures to the underlining calculation pursuant to WAC 480-07-140(6)(a)(ii)):

- a. Requested DNI Target per pilot: _____
- b. Number of requested funded pilots: _____
- c. Total Requested Target DNI (multiple a x b) _____
- d. Actual Total DNI _____
(This amount must be linked to Pro forma Results of Operations)
- e. Revenue Increase Requested _____
(subtract c – d)
- f. Gross-up factor (expressed as a decimal) _____
- g. Requested Additional Annual Revenue _____
(divide e/f)

BENCH REQUEST NO. 3:

To Burton (PSP):

Referencing Exh. WTB-05 “Restating Entries” worksheet Cell F36, the amount of the adjustment is hardcoded.

- Please provide a supporting workpaper which details how adjustment R-15 regarding Pilot Boat Juan de Fuca preventative maintenance was calculated. Please include the calculation in the Excel file created to respond to Bench Request No. 1 (above).

BENCH REQUEST NO. 4:

To PSP:

WAC 480-07-525(4)(m) requires submission of “projected changes in vessel assignments” when submitting a general rate case.

- 1) Please specify the location of the projected changes in vessel assignments within PSP’s testimony and exhibits.
- 2) If this is not included in PSP testimony and exhibits, please explain why PSP did not request a rule exemption.

BENCH REQUEST NO. 5:

To Jessica J. Norris or Weldon T. Burton (PSP):

Referring to your testimony (Norris, Exh. JJN-01T at 3:23-25, Accord Norris, Exh. JJN-02 at 20; Burton, Exh. WTB-4T at 8:15-20; Burton; Exh. WTB-5r), PSP has deferred funds, relating to the last rate case, Docket TP-190976, totaling \$124,239, reflecting the incremental difference in revenue collected from TOTE based on the prior GRT versus Tariff GT ICT measurement (NOTE: this is reflected in restating adjustment 13 in the amount of \$124,239).

- 1) The amount of \$124,239 is hardcoded which is inconsistent with the application of WAC 480-07-140(6)(a)(ii). Please provide the underlining calculations and assumptions for this amount.
- 2) TOTE claims that based on applying GT ICT, instead of GRT, results in deferred funds of \$378,411.84 in rate year one, and \$383,825.92 in rate year two. Please explain why PSP's annual amount is different from TOTE's amounts?

Please respond to these Bench Requests no later than Friday, April 21, 2023, by 5 p.m., by electronic filing with the Commission's Records Center. Please provide courtesy email copies to all parties and the presiding administrative law judge. If you have any questions concerning these requests, please contact Administrative Law Judge Michael Howard at 360-664-1139 or via email at michael.howard@utc.wa.gov.

/s/ Michael Howard
MICHAEL HOWARD
Administrative Law Judge

cc: All Parties