



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 COMMISSION STAFF (STAFF):

BENCH REQUEST NO. 6:

To Mike Young and or Jaclynn Simmons (Staff):

Referring to Exh. MY-9 and Exh. JNS-2r:

1. In the evidentiary hearing, Staff witness Simmons verbally proposed changes to Exhibit JNS-2r. Please provide updated and corrected exhibits for MY-9 and JNS-2r to reflect changes or corrections identified during the evidentiary hearing or through the Commission’s Bench Requests in this proceeding.
2. Please include in the updated and corrected JNS-2r a calculation for additional annual revenue using the following calculation in addition to what is already been provided in JNS-2r:

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)	
3. Referring specifically to *Exh. MY-9, “Staff Revenue Reconciliation,” cell E12, and Exh. JNS-2r, “Sch. 1.1 Results of Oper,” cell L19*, these two exhibits show two different Total Proposed Revenue (i.e. Total Revenue Requirement). Please specify which is Staff’s Total Proposed Revenue.

BENCH REQUEST NO. 7:

To Jaclynn Simmons (Staff):

Referring to your exhibit Exh. JNS-2r, “Sch. 1.2 Restating Adj”, and “Sch. 1.3 Pro Forma Adj”:

1. Please provide all supporting calculations for all of Staff’s proposed adjustments pursuant to WAC 480-07-140(6)(a)(ii). Provide these calculations in the Excel file requested in Bench Request 9 (above).
2. Also include a table that cross-references Staff’s proposed adjustments with PSP’s proposed adjustments.

BENCH REQUEST NO. 8:

To Mike Young (Staff):

Referring to your exhibit, Exh. MY-3 and Simmons exhibit, Exh. JNS-2r, “Sch. 1.2 Restating Adj” cell U24, and “Sch. 1.3 Pro Forma Adj” cell L23 representing Staff adjustments R-17 and PF-9:

- 1) Please explain the relationship between these adjustments.
- 2) Which of these represents Staff’s position?

BENCH REQUEST NO. 9:

To Mike Young (Staff):

Referring to Exh. MY-10:

- 1) Please provide the supporting Excel file that provides the reconciliation of Staff’s proposed revenue requirement with its proposed rates reflected in Exh. MY-10.

BENCH REQUEST NO. 10:

To Mike Young (Staff):

Referring to your exhibit, Exh. MY-10, staff’s proposed tariff rates:

- 1) Please clarify whether Staff agrees with PSP’s proposed new rate class and proposed rates for vessels 2,000 gross tons and under (Items 300 and 310)?

BENCH REQUEST NO. 11:

To Mike Young (Staff):

Referring to your cross-answering testimony, Exh. MY-11T at 6:1-11 and Exh. MY-5:

- 1) If medical expenses are included in TDNI, would these costs be subject to the cost-of-living automatic adjuster that PSP has proposed, and Staff has accepted?
- 2) Would these costs be adjusted on an ongoing basis as the cost of medical insurance premiums change over time? Please explain.

BENCH REQUEST NO. 12:

To Mike Young (Staff):

Referring to Exh. MY-11T at 9:15-21:

4. Exh. MY-11T at 9:15-21 describes the calculations Staff made to arrive at its recommended 56 FTE pilots. However certain inputs to the calculation are missing. Please provide a supporting Excel file detailing the calculations used to arrive at Staff's recommended 56 FTE pilots with specific references to the sources for each figure used in the calculations.

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