

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: April 21, 2023
DOCKET: TP-220513
REQUESTER: Bench

WITNESS: Staff
RESPONDER: Staff
TELEPHONE: (360) 664-1253

REQUEST NO. 6:

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.

RESPONSE:

1. For the corrections identified in the hearing, JNS-2r, JNS-7, JNS-1T, Restating adjustment R-11 should be \$126,673 and not \$131,331. This is to correct a double removal of the double payment.

In JNS-2r the removal of \$10,427 in the results of operations tab and restating tab on sch 1.2, this item was not intended to be adjusted out. Attachment 1- Staff Schedule of adjustments Attachment 2- Staffs Calculation for Legal Fees.

2. Staff was unsure what PSP's requested DNI was. Staff used the target DNI from order 09 page ii.
 - a) Requested DNI Target per pilot: \$410,075
 - b) Number of requested funded pilots: 56
 - c) Total Requested Target DNI (multiple a x b) \$22,964,200
 - d) Actual Total DNI \$24,849,545 (This amount must be linked to Pro Forma Results of Operations)

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- e) Revenue Increase Requested \$1,885,345 (subtract c - d)
- f) Gross-up factor (expressed as a decimal) **0** (there is no gross up, there are not any other taxes or fees besides B&O which is an expense item.)
- g) Requested Additional Annual Revenue (divide e/f) \$5,633,202 (located L18 on the Results of Operations tab)

Staff is unclear whether the Commission is referring to the total revenue or the DNI calculation. Staff Calculations are on the revenue reconciliation tab, *see* Attachment 3 - Staff Workbook.

3. BPC pass-through amounts were not included in the Results of Operations in the amount of \$1,457,011. It was unclear to Staff whether this amount and its associated rate would continue, but it is a pass-through, so the effect is neutral.

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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.

RESPONSE:

1. Please see Attachments 1 and 2.
2. Please see Attachment 4 – Adjustment Crosswalk.

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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?

RESPONSE:

1. U24 is removing 2021 actual cruise ship revenue and L23 is adding in 2022 projected revenue.
2. These adjustments were proposed by PSP and Staff did not contest these adjustments. *See Attachment 1 and Attachment 4.*

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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.

RESPONSE:

1. Since Staff has adjustments as stated in its answer to R 7, some of these numbers have changed, and Staff is providing the updated workpapers JNS-2r1 and MY-10r

See Attachment 3, Attachment 5 – Staff Revenue Reconciliation, and Attachment 6 – Staff Proposed Rates.

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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)?

RESPONSE:

1. Staff agrees with the proposed new rate class.

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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.

RESPONSE:

1. Yes-the COLA proposed by PSP was simply to increase tariff rates by the rate of inflation.
2. No. As proposed by PSP, the only adjustment would be to tariff rates as the yearly inflation rate changes. There would be no review of medical insurance costs without a general rate filing.

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REQUEST NO. 12:

To Mike Young

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.

RESPONSE:

Staff took the average assignments for the 12 months of 2021, 7443, and divided that by 11 (average number of assignments for each pilot) = 681.73, divided by 12 months = 56.8 pilots. Since PSP proposed 56, Staff accepted 56.

Please see Attachment 3, tab 12-month P&L, column Q, rows 126-131.