

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,
Complainant,

DOCKET NO. TP-190976

v.

PUGET SOUND PILOTS,
Respondent.

INITIAL BRIEF ON BEHALF OF COMMISSION STAFF

September 10, 2020

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I. INTRODUCTION

Under current Washington State law, all vessels (recreational or commercial) that are foreign flagged, except vessels from British Columbia, are subject to compulsory pilotage and any vessel over 200 feet overall is not allowed to apply for a pilotage exemption. Puget Sound Pilots (PSP) currently enjoys a monopoly as the only agency allowed to supply pilotage services to vessels in Washington State. The current tariff rate allows PSP members to earn more than Commission Staff calculated as their recommended median income for PSP members. As such, PSP is not in need of a rate increase.

II. SCHEDULING

PSP's Vice President needs to be a working pilot and actively moving vessels. The decision of the Executive Board of PSP to move the Vice-President to a full time in the office has had a horrible effect on the number callbacks accrued each year. PSP should also look into adjusting the day of their rotation change, by looking at a better day to complete rotation changes in order to try to alleviate the need to accrue unnecessary callback days.

III. CONCLUSION

The Commission should not make any changes to the current tariff structure until PSP makes changes to their bylaws in regard to rotation scheduling, the Vice President not taking assignments, and callback days.