

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

TOTE MARITIME ALASKA, LLC,

Movant,

PUGET SOUND PILOTS,

Respondent.

DOCKET

DECLARATION OF ALYSON ATALIE  
COLLIER

I, Alyson Atalie Collier, declare as follows:

1. I am over the age of eighteen, have personal knowledge of the matters attested to herein, and am capable of testifying to them.

2. I am a financial analyst with TOTE Services, LLC, which provides vessel management services, including financial analysis of vessel operations, to Movant TOTE Maritime Alaska, LLC (“TOTE”). I have calculated the impact of rates Puget Sound Pilots (“PSP”) began charging TOTE in January 2021 for pilotage services PSP provides to TOTE’s vessels MIDNIGHT SUN and NORTH STAR based on those vessels’ international gross tonnage (“IGT”), as opposed to their regulated (domestic) gross register tonnage (“GRT”).

3. The rates per ton authorized by the Commission’s Order 09 entitled FINAL ORDER REJECTING TARIFF SHEETS; AUTHORIZING AND REQUIRING COMPLIANCE FILING (DKT TP-190976), dated November 25, 2020, are as follows:

-Tonnage Charge Rate Gross Tonnage up to and including 20,000 tons: \$1,410.00 flat rate;

-Plus Gross Tonnage over 20,000 up to and including 50,000 tons: \$.0655 per ton;

-Plus Gross Tonnage over 50,000 up to and including 100,000 tons: \$.0605 per ton; and

-Plus Gross tonnage over 100,000 tons: \$.0555 per ton

4. I applied this new tariff rate calculation metric to the 35,825 GRT tonnage for both vessels as stated in the PSP worksheets which PSP submitted to WUTC. I determined that the proper pilotage tonnage charge for the two vessels in the new tariff's first year is \$2,446.54 as follows:

Pilotage Tariff	Rate	Quantity	Charge
Tonnage 0 to 20,000	Flat	20,000 Tons	\$1,410.00
Tonnage (> 20-50,000)	0.0655	15,825 Tons	\$1,036.54
Tonnage (> 50-100,000)	0.0605	0 Tons	\$0.00
<b>Total Tonnage Charges</b>		<b>35,825 Tons</b>	<b>\$2,446.54</b>

5. I then applied the new tariff tonnage rate to the 65,314 IGT tonnage which PSP began applying in its invoicing to TOTE in January 2021 for each of the two vessels. I derived a tonnage charge of \$4,301.50/pilotage assignment, as follows:

Pilotage Tariff	Rate	Quantity	Charge
Tonnage 0 to 20,000	Flat	20,000 Tons	\$1,410.00
Tonnage (> 20-50,000)	0.0655	30,000 Tons	\$1965.00
Tonnage (> 50-100,000)	0.0605	15,314 Tons	\$926.50
<b>Total Tonnage Charges</b>		<b>65,314 Tons</b>	<b>\$4,301.50</b>

6. Application of the IGT tonnage instead of GRT tonnage generates \$1,854.96 in higher charges for each pilotage service invoice ( $\$4,301.50 - \$2,446.54 = \$1,854.96$ ).

7. In last year's proceeding for WUTC's consideration of PSP's proposed revised tariff, PSP reported to WUTC 204 pilotage assignments/year for the two vessels during a PSP selected 12-month test period, and projected 204 Tote pilotage assignments/year using the same GRT tonnage for the two vessels. This is accurate. The volume of pilotage assignments for these vessels' dedicated coastwise service has been extremely consistent since they were launched in 2003.

8. I multiplied 204 assignments/year by the difference of \$1,854.96/invoice and derived a total excess fee increase of \$378,411.84 in the new tariff's first year.

9. The new tariff provides for further increases to tonnage charges during the second year. I determined the proper pilotage tonnage charge in the second year for each of the two vessels is \$2,478.78 as follows:

Pilotage Tariff	Rate	Quantity	Charge
Tonnage 0 to 20,000	Flat	20,000 Tons	\$1,428.00
Tonnage (> 20-50,000)	0.0664	15,825 Tons	\$1,050.78
Tonnage (> 50-100,000)	0.0614	0 Tons	\$0.00
<b>Total Tonnage Charges</b>		<b>35,825 Tons</b>	<b>\$2,478.78</b>

10. I applied the second-year tariff tonnage rate to the 65,314 IGT tonnage to determine the additional charges at this tonnage level. I derived a tonnage charge of \$4,360.28/pilotage assignment which is an additional \$1,881.50/invoice as follows:

Pilotage Tariff	Rate	Quantity	Charge
Tonnage 0 to 20,000	Flat	20,000 Tons	\$1,428.00
Tonnage (> 20-50,000)	0.0664	30,000 Tons	\$1,992.00
Tonnage (> 50-100,000)	0.0614	15,314 Tons	\$940.28
<b>Total Tonnage Charges</b>		<b>65,314 Tons</b>	<b>\$4,360.28</b>

11. I multiplied 204 assignments/year by the difference of \$1,881.50/invoice and derived a total excess fee increase of \$383,825.92 in the new tariff's second year.


12. The two-year total of excess charges I derived is \$762,237.76 (\$378,411.84 + \$383,825.92 = \$762,237.76).

13. Attached as Exhibit AC-1 are true and correct copies of the last invoice PSP issued to TOTE under its old tariff, and PSP's first invoice under its new tariff. These demonstrate the rate increases.

14. PSP has calculated rates for these two vessels since they were launched into dedicated coastwise service based on their GRT tonnage. This is confirmed by the hundreds of invoice references and calculations within PSP's worksheet filings to WUTC during last year's proceeding.

15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

EXECUTED at Jacksonville, Florida this 26<sup>th</sup> day of August, 2021.



Alyson Atalie Collier