PERKINSCOIE

10885 NE Fourth Street Suite 700 Bellevue, WA 98004-5579 1 +1.425.635.1400 1 +1.425.635.2400 PerkinsCoie.com

June 5, 2024

Sheree S. Carson SCarson@perkinscoie.com D. +1.425.635.1422

Electronically Filed

Jeff Killip, Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, Washington 98503

Re: Puget Sound Pilots Tariff Revision Docket TP-220513

Three Stem Conson

Dear Executive Director Killip:

Final Order 08 in the above referenced docket requires the Puget Sound Pilots (PSP) to file status updates regarding the Multiple Employer Plan (MEP) pension transition process every 60 days, beginning from the effective date of the Order. This letter provides PSP's fifth status report and updates the Commission on activity that has occurred since the last status report was filed on April 8, 2024.

As previously reported, on December 22, 2023, PSP submitted a request for an advisory opinion to the U.S. Department of Labor (DOL) regarding PSP's status as a plan sponsor of the MEP. PSP has not yet received an advisory opinion from DOL. PSP is continuing to work through details of its draft MEP and has not yet submitted a Determination Letter to the IRS. The MEP is a complex plan document requiring compliance with the Internal Revenue Code, ERISA, the IRS and the Department of Labor requirements.

PSP will keep the Commission apprised regarding this process in subsequent compliance filings.

Respectfully,

Sheree S. Carson

SSC:ijc Enclosures

cc: All Parties