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BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket No. TP-190976

TESTIMONY OF CAPTAIN MICHAEL
MOORE ON BEHALF OF PACIFIC
MERCHANT SHIPPING ASSOCIATION

1 the provision of the pilotage service which are not already accounted for in the current
2 tariff and covered by current tariff revenues. PSP's projections of the need for additional
3 pilots, as well as its logic for why a rate increase is necessary to pay for an increase in the
4 number of pilots and increased non-essential expenses, are faulty, speculative,
5 conclusory, and unproven. PSP has not addressed basic policy considerations under the
6 Pilotage Act, including the need to consider and preserve the State's interests in
7 protecting and growing waterborne commerce and improving the competitive position of
8 seaports in the Puget Sound.
9

10 **Second**, PSP's Petition proposes numerous wholesale revisions and rewrites of
11 the present tariff structure without adequate explanation. Some of these revisions may
12 have merit individually, like reducing upper tonnage rates, but it is impossible to
13 determine from the testimony how and why PSP would seek to increase charges at one
14 rate on some vessels while others may change at completely different rates at different
15 times for different years. The rate of increase on numerous vessels is significant.
16 Moreover, given the wholesale revision and hundreds of non-identified changes, it is
17 facially impossible for PMSA, the UTC, or the public to divine if there are some
18 revisions which should be isolated as solely tied to rate increases and others which are
19 meant to solely be structural revisions; all are part of a tariff meant to result in
20 significant increases in pilot revenues. PMSA would welcome a tariff revision and
21 restructuring process which includes all stakeholders with the goal of creating a tariff
22 which is simpler, less opaque, and directly related to the costs of services. For such a
23 process to be fair and inclusive we recommend that the Commission direct such a process
24 which is revenue neutral.
25
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