Exh. SS-7
Docket TP-250574
Witness: Scott Sevall

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, **Complainant,** **v.** **PUGET SOUND PILOTS,** **Respondent.**	**DOCKET TP-250574**

EXHIBIT TO TESTIMONY OF

SCOTT SEVALL

STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

BPC Summary – Number of Pilots

January 2, 2026

STATE OF WASHINGTON
BOARD OF PILOTAGE COMMISSIONERS
2901 Third Avenue, Suite 500 | Seattle, Washington 98121 | (206) 515-3904 | www.pilotage.wa.gov

2024 Number of Pilots Determination and Rationale

On August 15, 2024, the Washington State Board of Pilotage Commissioners (BPC or Board) voted to increase the Authorized Number of Pilots in the Puget Sound Pilotage District from 56 to 60 and for the Pilot Safety Committee (PSC) to investigate comp day usage potentially developing safeguards and guidelines, 7 in favor and 2 opposed.

The BPC's authority for setting the number of pilots is found in Chapter 88.16.035 (1)(d) and WAC 363-116-065 *Number of Pilots* describes the required and suggested parameters for determining the number of pilots.

In April 2024, Puget Sound Pilots (PSP) sent a letter to the BPC requesting the Board to address the number of pilots in the Puget Sound Pilotage District. In addition, they asked that the Board establish a Target Assignment Level (TAL). The Board, at that meeting, assigned the Pilot Safety Committee (PSC) with the task of preparing a recommendation for the TAL. The PSC was asked to determine the Target Assignment Level (TAL) for current conditions, since the TAL had not been adjusted to account for rest rule changes in the preceding several years. At the April meeting, the Board also adopted a process for submittals and determination as well as guidelines for the submissions. These documents as well as the other documents that make up the record of this Board-adopted process were posted on the BPC's website at https://pilotage.wa.gov/number-of-pilots.html.

Over the course of four work sessions during May and June 2024 the Pilot Safety Committee analyzed 5 years of pilot assignment data, quantifying the number of licensed pilots, the amount of Not Fit for Duty time, the number of on-watch assignments, the number of training days, and the number of upgrade trips – all the things that take up pilots' time. At the fourth work session the PSC voted to recommend a Target On-Watch Assignment Level of 123 assignments per pilot per year to align with the BPC's stated goal of limiting off watch assignments to a rate of 5% or less per year.

At the June 20 BPC Regular Monthly Board Meeting, the Board unanimously voted to set the Target On-Watch Assignment Level at 123 assignments per pilot per year, which does not include any callbacks

Two Parties of Interest identified themselves (Puget Sound Pilots (PSP) and Pacific Merchant Shipping Association) PMSA) and prepared submittals which were presented to the Board at the July 18 BPC Regular Monthly Meeting, utilizing the TAL of 123 to determine the proposed authorized number of pilots.

At the August 15 BPC Regular Monthly Board Meeting, the Parties of Interest offered rebuttals and a BPC staff recommendation was also presented. The BPC Staff Recommendation was based on staff review of the submittals and rebuttals. The recommendation was to increase the authorized number of pilots to 60, based on available data, trends in assignment levels, and expected retirements (both mandatory and elective).

The BPC Staff Recommendation document included:

- Summary of Main Points
  - PMSA & PSP pilotage demand forecast
  - PMSA & PSP suggested number of authorized pilots
  - PSP supporting arguments
  - PMSA supporting arguments (including 13 recommendations)
- Table 1
  - Forecasting annual assignments
  - Converting forecasted annual assignments to a range of number of pilots based on 0% callbacks, 2.5% callbacks, and 5% callbacks
- Table 2
  - Converting number of pilots to a range of number of assignments, assuming 129 annual assignments per pilot per year at the top of the range (5% callbacks) and 123 annual assignments per pilot per year at the bottom of the range (0% callbacks)

After dissemination of the data and discussion, the Board then voted to increase the Authorized Number of Pilots for the Puget Sound Pilotage District from 56 to 60 and for the PSC to investigate comp day usage, potentially developing safeguards and guidelines – 7 in favor and 2 opposed.

Additional details of the conversations at the meeting can be found in the August 15, 2024 Meeting Minutes.