

BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket No. TP-220513

PETITION TO INTERVENE BY
THE PACIFIC MERCHANT SHIP-
PING ASSOCIATION

INTRODUCTION AND IDENTITY OF PETITIONER

1. Pursuant to WAC 480-07-355, Pacific Merchant Shipping Association (“PMSA”) hereby petitions the Washington Utilities and Transportation Commission (“Commission”) for permission to intervene with full party status in the above-captioned matter.
2. The Commission previously granted PMSA intervenor status in the prior tariff increase brought by Puget Sound Pilots (“PSP”).¹ The same grounds apply for granting PMSA the right to intervene here.
3. As an independent nonprofit trade association focused on global trade, PMSA represents owners and operators of U.S.– and foreign–flagged ocean–going vessels operating throughout the world, including those plying Washington state

¹ *Wash. Utils. & Transp. Comm’n v. Puget Sound Pilots*, Docket TP-190976, Order 02 (Dec. 17, 2019).

waters as the customers of the compulsory Puget Sound pilotage monopoly. PMSA also represents service providers who depend on the ports as a competitive gateway, including marine terminal operators, shipping agents, assist and escort tug companies, bunker providers, and others.

4. PMSA is represented in this matter by the undersigned counsel, who is in good standing in the Washington State Bar Association. She represented PMSA in *Wash. Utils. & Transp. Comm'n v. Puget Sound Pilots*, Docket TP-190976 and is familiar with the issues in this matter. Pursuant to WAC 480-07-345(2), this petition serves as her Notice of Appearance in this matter.

INTEREST AND POSITION OF PMSA IN THE PROCEEDING

5. On behalf of its members and of the public interest generally in the health of the ports in the Puget Sound region, PMSA has an interest in ensuring fair marine pilotage rates and a sensible tariff structure.
6. PMSA's ocean-going vessel owner and operator members who are obliged to use compulsory services in the Puget Sound are directly impacted financially by the rates and tariffs charged for these services, and each is a "person with a substantial interest" under RCW 81.116.010(3). PMSA's non-vessel members also rely on working ports in the Puget Sound and the economic health and wellbeing of oceangoing vessel operations that may be impacted by marine pilotage rates and tariffs. Thus, PMSA and its membership have a direct and substantial economic interest in the issues to be addressed in this proceeding.

7. PMSA is concurrently bringing a motion to dismiss PSP’s petition in this matter for the reasons set forth therein. In the event the Commission denies the motion, PMSA wishes to submit written testimony and exhibits, cross-examine witnesses called by other parties, and submit written arguments and/or motions in this proceeding.

NAME AND ADDRESS OF PMSA’S REPRESENTATIVES

8. PMSA consents to service by electronic mail only and requests that the following individuals be added to the service list for this matter:

<p>Petitioner-Intervenor Representative: Michelle DeLappe FOX ROTHSCHILD LLP 1001 Fourth Ave., Suite 4400 Seattle, WA 98154-1065 (206) 389-1668 seasalt@foxrothschild.com</p>	<p>Information Only: Mike Jacob, Vice President & General Counsel PMSA 70 Washington St., Suite 305 Oakland, CA 94607 (510) 987-5000 mjacob@pmsaship.com Capt. Mike Moore, Vice President PMSA 2200 Alaskan Way Seattle, WA 98121 (206) 441-9700 mmoore@pmsaship.com</p>
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Respectfully submitted this 7th day of July, 2022.

FOX ROTHSCHILD LLP

s/ Michelle DeLappe

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