

November 20, 2019

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VIA WEB PORTAL AND OVERNIGHT MAIL

Mr. Mark L. Johnson
 Executive Director and Secretary
 Washington Utilities and Transportation Commission
 PO Box 47250
 Olympia, WA 98504-7250

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 UTIL. AND TRANSP.
 COMMISSION

Re: Puget Sound Pilots Initial Tariff Submission to the Washington Utilities and Transportation Commission
 Note: Tariff Effective Date - December 23, 2019

Dear Mr. Johnson:

Pursuant to RCW 81.16.055, the Puget Sound Pilots (“PSP”) submits this initial proposed tariff for action by the Washington Utilities and Transportation Commission as provided in SSB 6519 enacted during the 2018 legislative session. This submission is also guided by rules under Docket No. TP-180402 which the Commission adopted earlier this year. This filing requests an increase in present rates, which have been in place since 2015.

In addition, once the filing is suspended by the Commission and is part of an adjudicative proceeding, the evidence developed and ultimate findings and conclusions in the proceeding could produce pilotage revenue requirements that are higher or lower than the amounts requested in this very first Commission filing.

An overview of the topics covered by each of PSP’s eleven witnesses is provided in the prefiled direct testimony of Eric vonBrandenfels, Exhibit No. (EVB-1T), which is included as part of this filing.

For the parties’ convenience, we also now provide an index of all proposed exhibits for the PSP’s direct case below by individual witness and exhibit number, which are also being included in this submission.

| Witness | Testimony or Exhibit | Marked |
|----------------------|---|-------------|
| Eric von Brandenfels | Eric vonBrandenfels prefiled direct testimony | Exh. EVB-1T |
| | Master Pilot Exchange Card | Exh. EVB-02 |
| | Puget Sound Map | Exh. EVB-03 |
| | West Coast State Pilotage Districts Scale Map | Exh. EVB-04 |
| | | |
| Weldon Burton | Weldon Burton prefiled direct testimony | Exh. WTB-1T |

| | | |
|-----------------------|---|-------------|
| | Weldon T. Burton Curriculum Vitae | Exh. WTB-02 |
| | Pro forma Year 1 Test Period Ended 6-30-19 | Exh. WTB-03 |
| | Pro forma Year 2 Test Period 6-30-19 | Exh. WTB-04 |
| | Pro forma Year 3 Test Period 6-30-19 | Exh. WTB-05 |
| | Training Surcharge/Board of Pilotage Commissioners | Exh. WTB-06 |
| | Test Period Revenue Reconciliation 7-1-18 through 6-30-19 | Exh. WTB-07 |
| | Proposed UTC Tariff Year 1 | Exh. WTB-08 |
| | Proposed UTC Tariff Year 2 | Exh. WTB-09 |
| | Proposed UTC Tariff Year 3 | Exh. WTB-10 |
| | Priceout Revenue Calculation Year 1 Proposed Tariff | Exh. WTB-11 |
| | Priceout Revenue Calculation Year 2 Proposed Tariff | Exh. WTB-12 |
| | Priceout Revenue Calculation Year 3 Proposed Tariff | Exh. WTB-13 |
| | | |
| Ivan Carlson | Ivan Carlson prefiled direct testimony | Exh. IC-1T |
| | Calculations of Pilots Burning Callback Days | Exh. IC-02 |
| | Pilot Income Summary | Exh. IC-03 |
| | | |
| Steven Diess | Steven Diess prefiled direct testimony | Exh. SD-1T |
| | Actuarial analysis of Tariff Plan | Exh. SD-02 |
| | | |
| Sami Khawaja | Sami Khawaja prefiled direct testimony | Exh. SK-1T |
| | Curriculum Vitae of Sami Khawaja | Exh. SK-02 |
| | | |
| Stephen Moreno | Stephen Moreno prefiled direct testimony | Exh. SM-1T |
| | None | |
| | | |
| Jessica Norris | Jessica Norris prefiled direct testimony | Exh. JN-1T |
| | PSP's capitalization Policy, page 11 | Exh. JN-02 |
| | Note 10 to financial statement | Exh. JN-03 |
| | Consolidated Financial Statements for the years ended Dec 31, 2018 and 2017 | Exh. JN-04 |
| | Statement of Assets, Liabilities and Pilots' Equity | Exh. JN-05 |
| | | |
| Linda Styrk | Linda Styrk prefiled direct testimony | Exh. LS-1T |
| | Linda Styrk's curriculum vitae | Exh. LS-02 |
| | Note A.d. (pg 26) of PSP's 2018 financial statement. | Exh. LS-03 |
| | | |
| Walt Tabler | Walt Tabler prefiled direct testimony | Exh. WT-1T |
| | 2001 Memorandum of Understanding Among PSP, PSSOA, and Polar Tankers | Exh. WT-02 |
| | 2001 and 2002 Memoranda of Understanding | Exh. WT-03 |
| | Correspondence from the BPC chairman the Grays Harbor | Exh. WT-04 |

| | | |
|----------------------|--|------------|
| | Pilots and PSP. January 21, 1992 | |
| | Response to BPC letter dated February 12, 1992 | Exh. WT-05 |
| | Correspondence between BPC and Grays Harbor Pilots dated December 28, 1995 | Exh. WT-06 |
| | Board of Pilotage Commissioners May 11, 2006 | Exh. WT-07 |
| | Board of Pilotage Commissioners May 23, 2007 | Exh. WT-08 |
| | Board of Pilotage Commissioners May 8, 2008 | Exh. WT-09 |
| | | |
| George Quick | George Quick prefiled direct testimony | Exh. GQ-1T |
| | George Quick's Curriculum Vitae | Exh. GQ-02 |
| | Article re Texas pilot fatality | Exh. GQ-03 |
| | Harbors Navigation Code of CA statutes | Exh. GQ-04 |
| | | |
| Scott Coleman | Scott Coleman Prefiled Testimony | Exh. SC-1T |
| | Blank Chartlet of Local Areas and Routes | Exh. SC-02 |
| | Completed Chartlet of Local Areas and Routes | Exh. SC-03 |

As required by WAC 480-07-525(q), the proposed revenue requirement increase is impacted by the projected vessel assignment and ship traffic data which are integral to the proposal submitted herewith.

As noted, PSP is including prefiled direct testimony and exhibits supporting its general rate case at this time. In compliance with 480-07-525(1), PSP is providing overnight delivery on November 20, 2019 one paper copy and an electronic copy of all testimony and exhibits and the supporting workpapers for this case. As is customary in Commission general rate case proceedings, these materials will be offered into the record at the appropriate time and should not be construed or otherwise considered as evidence until so entered.

In order to protect the privacy of individual PSP pilots, individual name identifiers have been removed from various schedules and worksheets to avoid disclosure of tax identification information, personal contact and health care related data.

Finally, PSP agrees to waive a suspension hearing in this matter and requests that the Commission issue an order suspending these proposed changes for investigation and that a hearing to take testimony be scheduled at an upcoming prehearing conference.

Service and correspondence related to this file should be directed to:

Mr. Mark L. Johnson
November 20, 2019
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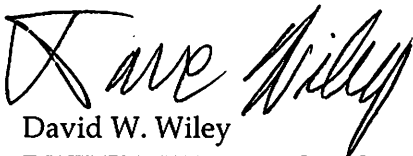
and;

Linda Styrk
Executive Director
Puget Sound Pilots
2003 Western Avenue, Suite 200
Seattle, WA 98121

Please contact the undersigned should you have further questions or concerns on this matter as it proceeds.

Yours truly,

WILLIAMS, KASTNER & GIBBS PLLC

A handwritten signature in black ink that reads "David W. Wiley". The signature is written in a cursive style with a large, stylized initial "D".

David W. Wiley
DWILEY@WILLIAMSKASTNER.COM
206-233-2895

Enclosures

cc: Puget Sound Pilots