

BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket TP-220513

**PETITIONER PUGET SOUND
PILOTS’ MOTION FOR LEAVE TO
SUPPLEMENT THE RECORD**

MOTION

1. Pursuant to WAC 480-07-375 and the Commission’s July 15, 2022, Complaint and Order Suspending Tariff Revisions (“Order 1”), Puget Sound Pilots (“PSP”) move for leave to supplement the record by filing the General Rate Case Executive Summary that is attached hereto as Exhibit A. In support of this motion, PSP relies on the record previously filed herein and the following points and authorities.

MEMORANDUM

2. On June 29, Puget Sound Pilots filed its second General Rate Case supported by more than 500 pages of testimony from 22 witnesses and more than 120 exhibits. That record demonstrates unequivocally that PSP is underfunded to the point that it ranks dead last in pilot income among the representative sample of 14 U.S. pilot groups for which data is publicly available, and that a new tariff that resolves, among other issues, the lack of revenue sufficient to support competitive pilot income is appropriate and necessary.

Contemporaneous with the filing of its General Rate Case, PSP moved the Commission to set an expedited hearing schedule due to the urgent nature of this matter.

3. On July 15, 2022, the Commission entered Order 01 suspending the tariff. Order 01 prohibits PSP from changing its filing without permission of the Commission.
4. To aid the Commission and the parties in navigating the large evidentiary filing in support of PSP's General Rate Case, PSP requests leave to file the attached Executive Summary. The Executive Summary does not include new evidence. Rather, it is designed and intended as a road map that provides a concise summary and citations to relevant testimony as to each key issue in this case. That road map will enable the Commission and the parties to more efficiently review and evaluate the issues raised and testimony and exhibits previously offered by PSP in support of this rate case.

CONCLUSION

5. Leave to file the attached Executive Summary should be granted because it does not present new evidence and will assist the Commission and the parties.

Respectfully submitted this 2nd day of August, 2022.

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