

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

DOCKET TP-220513

DECLARATION OF JEFF ROBERSON

I, Jeff Roberson, under penalty of perjury under the laws of the state of Washington, declare as follows.

1. I am over 18 years of age and competent to testify to the facts contained herein.
2. On October 20, 2022, the Pacific Merchant Shipping Association served a batch of data requests on the parties to this general rate case. Included within the batch was PMSA DR No. 118. A true and correct copy of the data request is attached to this declaration as Attachment A.

DATED this 7th day of February, 2023, at Tumwater, Washington.

/s/ Jeff Roberson

JEFF ROBERSON

ATTACHMENT A

Docket TP-220513
PMSA Data Request Nos. 107 to 133 to Puget Sound Pilots
October 20, 2022
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DATA REQUESTS: GENERAL INSTRUCTIONS

Pursuant to the Washington Utilities and Transportation Commission’s (UTC’s) Orders in this matter (TP-220513), and WAC 480-07-405, Intervenor Pacific Merchant Shipping Association (“PMSA”) propounds the following data requests to the Puget Sound Pilots (“PSP”).

1. These data requests call for all information, including but not limited to information contained in documents or any other tangible or material thing that is known or available to Puget Sound Pilots and including all information in the possession, custody, or control of you or your agents, employees, contractors, attorneys, accountants, auditors, or other persons who are under your, or your attorney’s employment, direction and/or control.

2. Please send all electronic documents and data in native format. For any documents that cannot be transmitted via email, please provide the documents via online fileshare; we can provide a secure site for uploading them if that would be helpful.

3. Please review all Excel documents and work papers for hidden cells. Hidden cells include hidden worksheets, columns, rows, and ranges. Please ensure that all items provided pursuant to these requests do not contain any hidden cells or formulas.

4. For purposes of these requests, the term “documents” or “documentation” includes, but is not limited to, letters, emails, correspondence of any kind (including all attachments and/or enclosures), messages, facsimiles, computer files and/or other electronically stored information, spreadsheets, presentations, reports, analyses, notes, minutes, memoranda, work papers, schedules, calendars, invoices, purchase orders, inventories, photographs, graphs, charts, drawings, diagrams, and all other taped, recorded, printed, written, typed, and/or electronic information.

TESTIMONY OF CHARLES COSTANZO

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PMSA DATA REQUEST NO. 118: Admit that, as adopted in ¶ 43 of Final Order 09 in the prior PSP Rate Case, TP-190976, the Commission stated,

In any general rate proceeding, the Commission’s ultimate goal is to set rates that are fair to customers and to the Company’s shareholders; just in the sense of being based solely on the record developed in a rate proceeding; reasonable in light of the range of possible outcomes supported by the evidence; and sufficient to meet the needs of the company to cover its expenses and attract necessary capital on reasonable terms.⁵⁷ In this context, the customers are the shippers – represented by PMSA and PYM – and the company is PSP and its member pilots. Because the pilots are the equivalent of PSP’s owners and shareholders, the ability to attract “necessary capital on reasonable terms” relates to PSP’s ability to attract and retain pilots to perform essential pilotage service in the Puget Sound pilotage district. We apply these guiding principles in the context of pilotage rate setting in this Order.

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