EXH. IC-35
DOCKET TP-250574
2025 PSP GENERAL RATE CASE
WITNESS: CAPTAIN IVAN CARLSON

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

NINETEENTH EXHIBIT (NONCONFIDENTIAL)
TO THE PREFILED REBUTTAL TESTIMONY OF

CAPTAIN IVAN CARLSON

ON BEHALF OF PUGET SOUND PILOTS

FEBRUARY 2, 2026

PILOT'S REPORT OF MARINE SAFETY OCCURRENCE

Board of Pilotage Commissioners
2901 Third Avenue, Ste 500; Seattle, Washington 98121
(206) 515-3904 FAX (206) 515-3906

Date: March 10, 2025
FILE WITH COMMISSION WITHIN 10 DAYS

Report of Marine Safety Occurrence – WAC 363-116-200 1 (b). A state licensed pilot and state licensed pilot trainee involved in a near-miss occurrence shall complete the board required *Report of Marine Safety Occurrence* form and file it with the board as soon as possible after the near-miss occurrence, but in no event more than ten days afterwards. If a pilot trainee is involved, both the pilot trainee and the supervising pilot shall file a *Report of Marine Safety Occurrence*. A near-miss occurrence is where a pilot and pilot trainee successfully takes action of a non-routine nature to avoid a collision with another vessel, structure or aid to navigation, to avoid a grounding of the vessel or to avoid causing damages to the environment. Information relating to near-miss occurrences provided by a pilot and pilot trainee on this form shall not be used for imposing any sanctions or penalties against the pilot or pilot trainee involved in the occurrence. A state licensed pilot or pilot trainee may also use this form on a voluntary basis for reporting out of the ordinary occurrences or concerns for navigational safety encountered or observed during the course of piloting a vessel as well as safety issues encountered or observed on the vessel, the dock, or in the area around the vessel.

If you are reporting a near-miss occurrence, you are required by law to complete this form and send it to the Pilotage Commission.

Date of Occurrence: March 2, 2025 **Time of Occurrence:** 01:22 **Near-Miss:** ☐ **or Navigational Safety Concern :** ☐

Vessel #1: MSC Ilenia **Registry:** Liberia	**Vessel #2:** **Registry:**
Length: 1200.8' **Beam** 167.6'	**Length:** **Beam**
Draft: FWD 40.7' **AFT** 43.6'	**Draft: FWD** **AFT**
Other Description: Ultra-large Container Vessel (ULCV)	**Other Description:**
Navigation Status: Underway **Other**	**Inside TSS Lanes: Yes** ☐ **No** ☐
Vessel #1 Location: Outbound TSS near Possession Pt.	**Vessel #2 Location or Hazard Position:**

Wind: **Speed:** Lt. **Direction:** Var

Tide / Current: **Speed:** 4.5 kt **Direction:** Flood **Height:** 2.6'

Light Condition: Night **Vis:** Clear **Dist:** Unlim **mi.** **Weather:** Fair **Other:**

Type of Occurrence

(Select those that most apply. If more than one, please explain in your narrative)

Close Aboard Associated With:	Shallow Water Associated With:	Near Allision Associated With:	Docking Difficulty Associated With:
Rules of Road ☐ **Rule** **Situation:**	**Avoidance Maneuver** ☐	**Avoidance Maneuver** ☐	**Tug use Difficulty** ☐
Restricted Visibility ☐	**Unanticipated Wind / Current Effects** ☐	**Unanticipated Wind / Current Effects** ☐	**Unanticipated Wind / Current Effects** ☐
Narrow Channel ☐	**Navigation Problem** ☐	**Navigation Problem** ☐	**Order Execution** ☐
Traffic Density ☐	**Equipment Malfunction** ■	**Equipment Malfunction** ☐	**Equipment Malfunction** ☐
Other:	**Other:**	**Other:**	**Other:**

Completion of this form does not replace or relieve the individual of any other reporting requirements under federal, state, or local law.

Name (type/print) Travis McGrath Contact Phone (206) 448-4455

Narrative Description

Please describe the occurrence, including the chain of events leading to the occurrence and human performance considerations, and suggest items that you think could prevent recurrence of a similar situation. Fill out additional pages and include diagrams, if appropriate.

See attachment.

Narrative Topics to Consider

How the Problem Arose	How the Problem Discovered	Contributing Factors	Corrective Actions	Perceptions
Judgments	Decisions	Procedures	Communications	Ship Design
Actions or Inactions	Experience	Language Difficulty	Personal Alertness	

Did you notify the vessel master of your intent to file this report? Yes ☒ No ☐

This form should be submitted as soon as possible, but no more than 10 days after the occurrence.
Submit the completed form to the Washington State Board of Pilotage Commissioners.
(Address on first page)

Vessel #1 Name: MSC Ilenia

Pilot Name: Travis McGrath

Signature: Travis McGrath

Pilot: Travis McGrath

MSO: MSC Ilenia Engine Malfunction

Date: March 2, 2025
Vessel: MSC Ilenia
Departure: Terminal 5, Seattle
Destination: Offshore, awaiting berth in Vancouver, BC
Time of Incident: 01:22

Summary of Events

On March 2, 2025, while outbound from Terminal 5, Seattle, en route to the Pilot Station, the MSC Ilenia experienced multiple engine issues. The vessel was scheduled to drift offshore for two weeks while awaiting a berth in Vancouver, BC. The Captain had been informed by the agent that Puget Sound anchorages were not available for vessels awaiting Canadian berths.

At 01:22, while proceeding at Full Ahead Maneuvering (15 knots STW), the Captain notified me that the vessel needed to reduce speed to Dead Slow Ahead due to a malfunctioning temperature sensor. I notified Seattle VTS of the speed reduction to troubleshoot an engine issue. After a few minutes, the vessel resumed Full Ahead.

Shortly after, the Captain informed me of a problem with the exhaust scrubber system, requiring another reduction to Dead Slow Ahead. By 01:50, the Captain reported a hydraulic fluid leak in the system controlling the exhaust valves and fuel injectors for one cylinder, requiring a complete engine shutdown for repairs.

I informed the Captain that a shutdown could only be conducted at anchor and began evaluating emergency anchorage options including Possession Bar, Oak Bay and Admiralty Bay.

At that time, no tug assistance was available for several hours. I also notified the pilot aboard an inbound containership to be aware of our engine issues.

At 01:52, I called the Seattle VTS Watch Supervisor, explaining the situation. During this call, the Captain stated that the vessel could maintain Dead Slow Ahead indefinitely. I advised both him and the Watch Supervisor that we would soon encounter a 4.5-knot flood current in Admiralty Inlet, which Dead Slow Ahead may not be sufficient to overcome. I recommended returning to Seattle to anchor.

The Captain then stated that the vessel could operate at Slow Ahead and, in an emergency, Half Ahead. I relayed this to the Watch Supervisor, who, after consulting with the Command Center, authorized the vessel to proceed to sea without a tug escort and conduct repairs while drifting off the Washington coast.

I disembarked at the Pilot Station at 06:40.

Concerns & Recommendations

I have the following concerns regarding this incident:

1. Bypassing Safe Anchorages: The vessel was permitted to proceed to sea for repairs rather than anchoring, despite the availability of safe anchorages within Puget Sound.
2. Lack of Tug Escort: The vessel was authorized to proceed with a known engine issue and no available tug escort, increasing potential risks.
3. Class Inspection Uncertainty: It is unclear whether the vessel will be required to undergo a Class inspection upon return.
4. Policy on Vessels Awaiting BC Berths: The ongoing restriction preventing ships awaiting Canadian berths from anchoring in Puget Sound remains a significant safety concern, especially when anchorages are available and would reduce risks associated with offshore drifting.

I believe this incident underscores the need to reassess current anchorage policies and reconsider procedures for vessels experiencing mechanical failures while departing Puget Sound.

Respectfully submitted,

Capt. Travis McGrath