

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

TOTE MARITIME ALASKA, LLC,

Movant,

PUGET SOUND PILOTS,

Respondent.

DOCKET TP-220513

TESTIMONY OF ALYSON ATALIE DUBS

ON BEHALF OF INTERVENOR TOTE MARINE ALASKA, LLC

February 10, 2023

1. What is your name and occupation as it relates to TOTE Marine Alaska, LLC?

My name is Alyson Atalie Dubs (I recently married and changed my last name from Collier, which I used in early declarations in this proceeding). I am the accounting supervisor of TOTE Resources, LLC which provides financial services to TOTE Maritime Alaska, LLC (“TOTE”).

2. Describe your educational and vocational background?

I hold an MBA with concentration in Accounting from the University of North Florida; a BA in Finance from Florida State University (Cum Laude honors); and have over nine years of broad experience in Accounting & Finance. My industry experience includes engineering, logistics (including maritime) and banking. My skill set includes preparing monthly financial statements, GL updates, reconciliations, researching projects and analyzing budgets versus actuals, preparing profit/loss analysis, investigating any fluctuations during monthly contract reporting and validating financials.

3. What is the purpose of your testimony?

To provide an accounting overview of the impact of the change in methodology Puget Sound Pilots (“PSP”) began applying in January 2021 in its assessment of pilotage rates charged for its services to TOTE’s vessels MIDNIGHT SUN and NORTH STAR.

4. Did you make calculations as to the impact of PSP charging TOTE in January 2021 for pilotage services PSP provides to TOTE’s vessels MIDNIGHT SUN and NORTH STAR based on those vessels’ international gross tonnage (“IGT”), as opposed to their regulated (domestic) gross register tonnage (“GRT”)? If so, please explain in detail what you calculated.

Yes. The rates per ton authorized by the Washington Utilities and Transportation Commission (“WUTC”) in its Order 09 entitled “FINAL ORDER REJECTING TARIFF

SHEETS; AUTHORIZING AND REQUIRING COMPLIANCE FILING (DKT TP-190976),”

dated November 25, 2020, are as follows:

- Tonnage Charge Rate Gross Tonnage up to and including 20,000 tons: \$1,410.00 flat rate;
- Plus Gross Tonnage over 20,000 up to and including 50,000 tons: \$.0655 per ton;
- Plus Gross Tonnage over 50,000 up to and including 100,000 tons: \$.0605 per ton; and
- Plus Gross tonnage over 100,000 tons: \$.0555 per ton

I applied this new tariff rate calculation metric to the 35,825 GRT tonnage for both vessels as stated in the PSP worksheets which PSP submitted to WUTC in support of its General Rate Case in 2020. I determined that the proper pilotage tonnage charge for the two vessels in the new tariff’s first year is \$2,446.54 as follows:

Pilotage Tariff	Rate	Quantity	Charge
Tonnage 0 to 20,000	Flat	20,000 Tons	\$1,410.00
Tonnage (> 20-50,000)	0.0655	15,825 Tons	\$1,036.54
Tonnage (> 50-100,000)	0.0605	0 Tons	\$0.00
Total Tonnage Charges		35,825 Tons	\$2,446.54

I then applied the new tariff tonnage rate to the 65,314 IGT tonnage which PSP began applying in its invoicing to TOTE in January 2021 for each of the two vessels. I derived a tonnage charge of \$4,301.50/pilotage assignment, as follows:

Pilotage Tariff	Rate	Quantity	Charge
Tonnage 0 to 20,000	Flat	20,000 Tons	\$1,410.00
Tonnage (> 20-50,000)	0.0655	30,000 Tons	\$1965.00
Tonnage (> 50-100,000)	0.0605	15,314 Tons	\$926.50
Total Tonnage Charges		65,314 Tons	\$4,301.50

Application of the IGT tonnage instead of GRT tonnage generates \$1,854.96 in higher charges for each pilotage service invoice ($\$4,301.50 - \$2,446.54 = \$1,854.96$).

In last year's proceeding for WUTC's consideration of PSP's proposed revised tariff, PSP reported to WUTC 204 pilotage assignments/year for the two vessels during a PSP-selected 12-month test period, and projected 204 Tote pilotage assignments/year using the same GRT tonnage for the two vessels. This is accurate. The volume of pilotage assignments for these vessels' dedicated coastwise service has been extremely consistent since they were launched in 2003.

I multiplied 204 assignments/year by the difference of \$1,854.96/invoice and derived a total excess fee increase of \$378,411.84 in the new tariff's first year.

The new tariff provides for further increases to tonnage charges during the second year. I determined the proper pilotage tonnage charge in the second year for each of the two vessels is \$2,478.78 as follows:

Pilotage Tariff	Rate	Quantity	Charge
Tonnage 0 to 20,000	Flat	20,000 Tons	\$1,428.00
Tonnage (> 20-50,000)	0.0664	15,825 Tons	\$1,050.78
Tonnage (> 50-100,000)	0.0614	0 Tons	\$0.00
Total Tonnage Charges		35,825 Tons	\$2,478.78

I applied the second-year tariff tonnage rate to the 65,314 IGT tonnage to determine the additional charges at this tonnage level. I derived a tonnage charge of \$4,360.28/pilotage assignment which is an additional \$1,881.50/invoice as follows:

Pilotage Tariff	Rate	Quantity	Charge
Tonnage 0 to 20,000	Flat	20,000 Tons	\$1,428.00
Tonnage (> 20-50,000)	0.0664	30,000 Tons	\$1,992.00
Tonnage (> 50-100,000)	0.0614	15,314 Tons	\$940.28
Total Tonnage Charges		65,314 Tons	\$4,360.28

I multiplied 204 assignments/year by the difference of \$1,881.50/invoice and derived a total excess fee increase of \$383,825.92 in the new tariff's second year.

The two-year total of excess charges I derived is \$762,237.76 (\$378,411.84 + \$383,825.92 = \$762,237.76).

Attached as Exhibit AD-1 are true and correct copies of the last invoice PSP issued to TOTE under its old tariff, and PSP's first invoice under its new tariff. These demonstrate the rate increases.

5. How long had PSP calculated rates for TOTE's two vessels based on their GRT tonnage prior to January 2021?

PSP had calculated rates for these two vessels since they were launched into dedicated coastwise service based on their GRT tonnage. This is confirmed by the hundreds of invoice references and calculations within PSP's worksheet filings to WUTC during last year's proceeding.

6. How much more will PSP's new pricing methodology cost TOTE? Please explain in detail.

Based on PSP's calculation of pilotage fees for the two vessels based on their IGT between January 25, 2021 and the present, PSP has invoiced TOTE, and TOTE has paid or will pay PSP, \$719,255.28, in higher pilotage fees than PSP would have charged had PSP calculated those fees based on the two vessels' GRT.

This is demonstrated by the table attached hereto as Exhibit AD-2, which I created and which contains my true and correct accounting analysis.

7. Does this conclude your testimony?

Yes.