

Exh. MM-17
Docket TP-220513
Witness: Michael Moore

**BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket No. TP-220513

**EXHIBIT TO TESTIMONY OF
Captain Michael Moore
ON BEHALF OF
PACIFIC MERCHANT SHIPPING ASSOCIATION**

PSP Responses to PMSA DRs 224-229

FEBRUARY 10, 2023

PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS Nos. 224-243

DATE PREPARED: December 21, 2022 DOCKET: TP-220513 REQUESTER: Pacific Merchant Shipping Association ("PMSA")	WITNESS: WALTER TABLER RESPONDER: WALTER TABLER PUGET SOUND PILOTS DATE: January 10, 2023 TEL: 206-335-8102 EMAIL: wtabler@outlook.com
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PMSA DATA REQUEST NO. 224: Regarding your testimony at Exh. WST-01T 5:22-6:9, please provide a copy of any and all pension plan documents, including any state or federal filings, and employment agreements which describe and/or govern the retirement benefits that you receive from PSP.

RESPONSE: A copy of my March 17, 2008 Employment Agreement with PSP and an Addendum to that agreement are attached.

PMSA DATA REQUEST NO. 225: Further regarding your testimony at Exh. WST-01T 5:22-6:9, please admit that this is a defined benefit retirement plan earned by you during your time and service as an employee of PSP.

RESPONSE: Admit.

PMSA DATA REQUEST NO. 226: Further regarding your testimony at Exh. WST-01T 5:22–6:9, please provide a history or schedule of the contributions, if any, that were made **by PSP** as your employer in support of your defined benefit retirement plan prior to your retirement and identify the fund to which these contributions were made.

RESPONSE: PSP made no contributions during my employment.

PMSA DATA REQUEST NO. 227: Further regarding your testimony at Exh. WST-01T 5:22–6:9, please provide a history or schedule of the contributions, if any, that were made **by you** as an employee of PSP in support of your defined benefits retirement plan prior to your retirement and identify the fund to which these contributions were made.

RESPONSE: I made no contributions.

PMSA DATA REQUEST NO. 228 Further regarding your testimony at Exh. WST-01T 5:22–6:9, do you agree with and find to be accurate the accounting in the testimony of Mr. Weldon Burton at Exh.WTB-03, pg.1, regarding “Account 52250-009: Pension,Tabler” regarding calendar year 2021, that monthly expenses were \$5,792 for a total of \$69,502?.

RESPONSE: Yes.

PMSA DATA REQUEST NO. 229: Further regarding your testimony at Exh. WST-01T 5:22–6:9, as Executive Director and General Counsel of PSP during the term of your employment, did you file, cause to be filed, or otherwise know of the filing of an annual Form 5500 with the Internal Revenue Service regarding your defined benefit pension as an employee of PSP? If so, please provide copies of the Form 5500 filings for each year filed.

Please note, to the extent that PSP considers such information confidential or proprietary, the Commission's practice in cases where a protective order is not available is that rather than decline to produce the entire document that a response should redact confidential or proprietary information. In this instance, PMSA would consider that information to be redacted to include names or social security numbers or like unique identifying information.

RESPONSE: No.