

BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

Docket No. TP-190976

PETITION TO INTERVENE BY THE
PACIFIC MERCHANT SHIPPING
ASSOCIATION

INTRODUCTION AND IDENTITY OF PETITIONER

1. Pursuant to WAC 480-07-355, Order 01, and the Notice of Prehearing Conference on file for Docket No. TP-190976, the Pacific Merchant Shipping Association (“PMSA”) hereby petitions the Washington Utilities and Transportation Commission (“Commission”) for permission to intervene with full party status in the above-captioned matter.
2. PMSA is an independent, not-for-profit trade association focused on global trade. PMSA represents owners and operators of U.S.- and foreign-flagged ocean-going vessels operating throughout the world, including those plying Washington state waters as the customers of the compulsory Puget Sound pilotage monopoly. PMSA also represents service providers who depend on the ports as a competitive gateway, including marine terminal operators, shipping agents, assist and escort tug companies, bunker providers and others.

3. PMSA is represented in this matter by the undersigned counsel, Michelle DeLappe, who is a member in good standing in the Washington State Bar Association. Counsel is familiar with the pleadings and other documents on file to date and the issues to be considered by the Commission. Pursuant to WAC 480-07-345(2), this petition serves as her Notice of Appearance in this matter.

INTEREST AND POSITION OF PMSA IN THE PROCEEDING

4. On behalf of its members and of the public interest generally in the health of the ports in the Puget Sound region, PMSA has an interest in ensuring fair marine pilotage rates and a sensible tariff structure.

5. PMSA's ocean-going vessel owner and operator members who are obliged to use compulsory services in the Puget Sound are directly impacted financially by the rates and tariffs charged for these services, and each is a "person with a substantial interest" under RCW 81.116.010(3). PMSA's non-vessel members also rely on working ports in the Puget Sound and the economic health and well-being of ocean-going vessel operations that may be impacted by marine pilotage rates and tariffs. Thus, PMSA and its membership has a direct and substantial economic interest in the issues to be addressed in this proceeding.

6. PMSA opposes an increase in the marine pilotage rates and tariffs. PMSA supports reexamining the tariff structure but has concerns regarding certain of the proposed changes.

7. PMSA wishes to submit written testimony and exhibits in this proceeding. PMSA anticipates that it will cross-examine witnesses called by other parties and submit written arguments and/or motions.

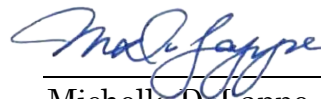
NAME AND ADDRESS OF PMSA'S REPRESENTATIVE

8. PMSA consents to service by electronic mail only and requests that the following individuals be added to the service list for this matter:

Petitioner-Intervenor Representative: Michelle DeLappe Foster Garvey P.C. 1111 Third Avenue, Suite 3000 Seattle, Washington 98101 (206) 816-1403 michelle.delappe@foster.com seasalt@foster.com	Information Only: Mike Jacob, Vice President & General Counsel PMSA 70 Washington St., Suite 305 Oakland, CA 94607 (510) 987-5000 mjacob@pmsaship.com Capt. Mike Moore, Vice President PMSA 2200 Alaskan Way Seattle, WA 98121 (206) 441-9700 mmoore@pmsaship.com
---	--

Respectfully submitted this 6th day of December, 2019.

FOSTER GARVEY PC



Michelle DeLappe, WSBA # 42184
FOSTER GARVEY PC
1111 Third Avenue, Suite 3000
Seattle, Washington 98101
Telephone: (206) 816-1403
Facsimile: (206) 447-9700
Email: Michelle.DeLappe@foster.com
seasalt@foster.com
*Attorneys for Pacific Merchant Shipping
Association*