

Exh. MM-64
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 CROSS-ANSWERING TESTIMONY OF
Captain Michael Moore
ON BEHALF OF
PACIFIC MERCHANT SHIPPING ASSOCIATION**

UTC Staff Responses to PMSA Data Requests 1-5

MARCH 3, 2023

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: March 2, 2023
DOCKET: TP-220513
REQUESTER: PMSA

WITNESS: Mike Young
RESPONDER: Mike Young
TELEPHONE: (360) 664-1155

REQUEST NO. 1: Regarding the “Target DNI @ 56 pilots” testimony at Exhibit MY-09, please explain and detail the sources for inputs that are used for the line “Target DNI @ 56 pilots” under both “PSP Proposed Rates” and “Staff Proposed Rates.”

RESPONSE:

Staff started with the 52 pilots allowed in the prior case TP-190976, Order 09. Staff divided the number of ship assignments from that case, 6,900 by 52 to get an average assignment number. Staff then divided the projected number of assignments in this case, which is 7,400 by the average assignments and rounded down to 56.

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REQUEST NO. 2: Regarding the “DNI Calculation” testimony at Exhibit MY-09, please clarify whether “DNI Calculation” is intended to be associated with the column “Current Rates” (the column in which they are located in this table) or are these calculations intended to be separate from the column headings for the data located in the table above.

RESPONSE:

No. The calculation was inadvertently placed in the column with the header “Current Rates.” The calculation is meant to apply to the Staff proposed DNI in this case, and should have been displayed in a separate box.

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REQUEST NO. 3: Regarding the “DNI Calculation” testimony at Exhibit MY-09, please admit both of the following:

- a. That the UTC Staff proposed Total DNI is based on a proposed TDNI which is the product of DNI and a number of pilots, in addition to the proposed adjustment for medical premiums; and,
- b. That the Total DNI is based on the value of the product of a DNI of \$410,075 per pilot and the number of pilots at 56, in order to reach the amount of \$22,964,200.

RESPONSE:

Admit, with regard to both 3.a and 3.b. Staff used the DNI from the previous case, year 2 of \$410,075 and multiplied by 56 pilot FTEs (refer to response to Request No. 1) plus an adjustment for medical premiums.

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REQUEST NO. 4: Further with respect to Exhibit MY-09, please provide the Staff rationale for using 56 pilots in its TDNI calculation and the rationale for not applying the number of pilots formula used by Staff in the prior rate hearing.

RESPONSE:

As stated in response to Request No. 1, Staff started with the 52 pilot FTEs embedded in current rates by the Commission in Order 09. In the previous case, the Commission rejected Staff's proposed pilot number methodology.

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REQUEST NO. 5: Further with respect to Exhibit MY-09, please provide the Staff rationale for using DNI of \$410,075 per pilot in its TDNI calculation.

RESPONSE:

Staff used the DNI of \$410,075 as determined by the Commission in the previous case, Order 09, because that is the DNI amount embedded in the current tariff rates. Staff did not propose any increase to that DNI amount, with the exception of adding pilots' medical premiums (Staff adjustment PF-8) to reach a new total.