

PMSA's Motion for Summary Determination EXHIBIT A-1
PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS 202-264

DATE PREPARED: March 18, 2020	WITNESS: N/A
DOCKET: TP-190976	RESPONDER: Puget Sound Pilots
REQUESTER: PMSA	

PROPOSED TARIFF

PMSA STAFF DATA REQUEST NO. 202:

Please provide the following:

- a) PSP's proposed tariff sheet for year one that complies with WAC 480-160-110 and 480-160-120 in comparing the proposed tariff with the existing tariff (WAC 363-116-300, which remains in effect under RCW 81.116.050).
- b) PSP's proposed tariff sheet for year two that complies with WAC 480-160-120.
- c) PSP's proposed tariff sheet for year three that complies with WAC 480-160-120.

RESPONSE TO DATA REQUEST NO. 202:

Response to Subpart a):

Objection. As is expressly stated in the testimony (WTB-1, p.4), "...reflecting the changes in legislative format would be entirely meaningless." Thus a tariff set by an unrelated agency, comparing a tariff submitted to the UTC for approval versus a tariff set by an unrelated agency with wholly differing format requirements, would be an exercise in futility. The Commission's rule at WAC 480-160-110 and 120 envisions comparisons of Commission-approved tariffs and this apparent "make work" exercise would result in endless pages of interlineations of the predecessor tariff's 400 plus tariff items in legislative format against the proposed tariff's approximate 95% fewer items.

Puget Sound Pilots (PSP) is a person with substantial interest which petitioned the commission to modify the existing tariff WAC 363-116-300 by filing revised tariff pages and format. In this filing, PSP eliminated approximately 430 individual charge categories.

Response to Subpart b):

Tariff pages for year two were filed with the Commission as Exhibit WTB-09. No other responsive documents exist.

Response to Subpart c):

Tariff pages for year three were filed with the Commission as Exhibit WTB-10. No other responsive documents exist.

PMSA's Motion for Summary Determination EXHIBIT A-2
PUGET SOUND PILOTS' RESPONSE TO PMSA DATA REQUEST 415

DATE PREPARED: July 9, 2020	WITNESS: Weldon Burton
DOCKET: TP-190976	WITNESS: Stephan Moreno
REQUESTER: PMSA	RESPONDER: Puget Sound Pilots

PMSA DATA REQUEST NO. 415: Admit PSP has not examined the current tariff as part of this proceeding. If PSP denies this, cite the testimony or exhibits in which PSP has set forth its examination of the current tariff.

RESPONSE TO PMSA DATA REQUEST NO. 415:

Objection. Overbroad, vague and ambiguous in use of the term “examined the current tariff.” Without waiving the foregoing objection, PSP answers as follows:

Denied. This entire proceeding is predicated on proposed revisions to the current tariff as not being “fair, just, reasonable and sufficient” as currently adopted by a predecessor tariff-setting entity. Because this is also the inaugural ratesetting proceeding for marine pilotage tariffs established by the WUTC, the tariff proponent here has the added burden of establishing baseline metrics by which pilotage rates are set nationally and previously in Washington by the BPC and the historical backdrop against which they are and have been set, further complicated by the fact that the existing tariff ratemaking precepts are characterized as a “black box” (Testimony of Danny Kermode, Exh, DPK-1T, p.5). Moreover, both the ultimate revenue requirement sought by the filing and the proposed rate design seek to build upon current insufficiencies including inadequacies of current return, revenues, DNI and interpretive application complexities raised by the design of the present tariff. As to the latter, see particularly the testimony of Captain Stephan Moreno. Also see the testimony and exhibits of Weldon Burton of November 19, 2019, and his pro forma results of operations, various restating adjustments and numerous workpapers illustrating the effect of the current tariff insufficiencies.