

Exh. MM-49  
Docket TP-190976  
Witness: Capt. Michael Moore

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND PILOTS,

Respondent.

**DOCKET TP-190976**

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

*PSP Responses to PMSA Data Requests Cited in Cross-Answering Testimony*

July 13, 2020

PUGET SOUND PILOTS RESPONSES TO DATA REQUEST NOS. 1 - 35 of Page 1 of 5  
PACIFIC MERCHANT SHIPPING ASSOCIATION

DATE PREPARED: February 5, 2020	WITNESS: Linda Styrk
DOCKET: TP-190976	RESPONDER: Puget Sound Pilots
REQUESTER: PMSA	

**DATA REQUEST NO. 9:** For each individual pilot associated with PSP at any time from 2016 to present, please itemize in detail, by year and by the pilot or the pilot's entity's name, the following amounts: all earnings, income, benefits (including any deferred compensation), allowances, any individual retirement contributions, any benefits in addition to individual retirement contributions, and expenses.

**RESPONSE TO DATA REQUEST NO. 9:**

Objection. PSP objects to producing information regarding expense or income information outside the test year, which commences on July 1, 2018, as such information is irrelevant to a general rate proceeding. PSP also objects to producing information regarding individual retirement contributions as irrelevant to a general rate proceeding as pilot's elections to contribute to individual retirement plans, if any, do not impact rates.

Subject to and without waiving the foregoing objections, PSP responds as follows:

PSP does not possess or maintain information regarding pilots' contributions to or expenses for the administration of individual retirement plans, if any.

Information regarding pilot earnings and income are contained in PSP's initial filing. For example, information regarding pilot income, operating expenses and individual business expenses are contained in Exhibit JN-04. See also WTB-03. PSP's audited financial statement for 2019 has not been completed, but will also be produced when complete.

Information regarding pilot's disability insurance premium expense is included in Exhibit JN-04 (see pages 22 and 26).

PUGET SOUND PILOTS RESPONSES TO DATA REQUEST NOS. 1 - 35 of Page 2 of 5  
PACIFIC MERCHANT SHIPPING ASSOCIATION

DATE PREPARED: February 5, 2020	WITNESS: Linda Styrk
DOCKET: TP-190976	RESPONDER: Puget Sound Pilots
REQUESTER: PMSA	

**DATA REQUEST NO. 16:** Please provide federal income tax returns for 2016 through present for each of the following: (a) PSP, (b) all PSP affiliates, (c) each pilot and pilot business entity for pilots for all years each was associated with PSP during this period. Note that for (c) above, it is acceptable to redact confidential personal information, provided that each return produced must show the taxpayer name and all line items and amounts that are related to or include income and/or expenses related to pilotage services.

**RESPONSE TO DATA REQUEST NO. 16:**

Objection. PSP objects that these documents are confidential and no protective order is available from the Commission in this proceeding. PSP further objects to producing information regarding expense or income information that precedes the test year, which commences on July 1, 2018, as such information is irrelevant to its general rate proceeding. PSP objects further to producing federal income tax returns for each pilot or pilot entity on the grounds that the same contain personal information and information that is not relevant to this proceeding, which are not in its possession in any event. PSP further objects to producing individual K-1 statements containing personal information of pilots. A more detailed portrayal of PSP's expenses and revenues have been filed with the Commission in the form of an audited financial statement for 2018, Exhibit JN-05, and workpapers.

PUGET SOUND PILOTS RESPONSES TO DATA REQUEST NOS. 1 - 35 of Page 3 of 5  
PACIFIC MERCHANT SHIPPING ASSOCIATION

DATE PREPARED: February 5, 2020	WITNESS: Ivan Carlson
DOCKET: TP-190976	RESPONDER: Puget Sound Pilots
REQUESTER: PMSA	

**DATA REQUEST NO. 1:** Please provide all PSP organizational documents currently in effect, including any bylaws, partnership agreements, and documents showing the equity interest or share of each individual pilot or pilot entity in PSP.

**RESPONSE TO DATA REQUEST NO. 1:**

Objection. PSP objects that this request is overly broad and seeks information that is not relevant to a general rate proceeding. Specifically, information regarding pilots' equity interest or share of PSP is not relevant helpful to the Commission's adjudication of this rate case when each pilot's share of revenue and expense are already included in PSP's audited financial statements filed with the Commission. Subject to and without waiving said objection, the following documents currently in effect, which are subject to change over time are being produced:

- First Revised Bylaws of Puget Sound Pilots, bates labels commencing on PSP\_002212.
- Operating Rules, bates labels commencing on PSP\_002235.
- Amended Retirement Program of Puget Sound Pilots, bates labels commencing on PSP\_000384

PUGET SOUND PILOTS RESPONSES TO DATA REQUEST NOs. 1 - 35 of Page 4 of 5  
PACIFIC MERCHANT SHIPPING ASSOCIATION

DATE PREPARED: February 5, 2020	WITNESS: Ivan Carlson
DOCKET: TP-190976	RESPONDER: Puget Sound Pilots
REQUESTER: PMSA	

**DATA REQUEST NO. 26:** Please list by month and year the number of pilotage assignments performed by the PSP Vice President from 2010 through 2019.

**RESPONSE TO DATA REQUEST NO. 26:**

Objection. PSP objects to producing information regarding expense or income information that precedes the test year, which commences on July 1, 2018, as such information is irrelevant to a general rate proceeding.

Subject to and without waiving the foregoing objections, PSP responds as follows:

As PSP's Vice President, my assignments by month for the years 2018 and 2019 were as set forth in the following table.

Month/Year	Vessel Assignment	Repo	Admin. Duty Day
Jan. 2018	11	1	5
Feb. 2018	13	4	5
Mar. 2018	4	1	11
Apr. 2018	4	0	15
May 2018	3	0	5
Jun. 2018	15	3	9
Jul. 2018	16	2	5
Aug. 2018	7	1	15
Sep. 2018	6	1	17
Oct. 2018	2	0	14
Nov. 2018	3	1	18
Dec. 2018	5	2	13
<b>2018 Totals</b>	<b>89</b>	<b>16</b>	<b>132</b>
Jan. 2019	2	0	23
Feb. 2019	1	0	23
Mar. 2019	1	0	21
Apr. 2019	0	0	26
May 2019	2	0	8
Jun. 2019	7	0	13
Jul. 2019	10	2	10
Aug. 2019	3	3	15
Sep. 2019	2	0	22
Oct. 2019	0	0	27
Nov. 2019	2	0	23

PUGET SOUND PILOTS RESPONSES TO DATA REQUEST NOS. 1 - 35 of Page 5 of 5  
PACIFIC MERCHANT SHIPPING ASSOCIATION

Dec. 2019	2	0	23
<b>2019 Totals</b>	<b>32</b>	<b>5</b>	<b>234</b>