

PACIFIC MERCHANT SHIPPING ASSOCIATION'S RESPONSES TO
UTC STAFF DATA REQUEST NOS. 1-3

DATE PREPARED: February 24, 2023	WITNESS: Capt. Michael Moore
DOCKET: TP-220513	RESPONDER: Capt. Michael Moore,
REQUESTER: UTC Staff	Pacific Merchant Shipping Assn.

UTC STAFF DATA REQUEST NO. 1:

The testimonies of Kathleen Nalty and Captain Moore explain the importance of DEI, but don't clearly state what adjustments PMSA is recommending. Please provide the specific amounts of allowable DEI expenses that PMSA is recommending.

PMSA RESPONSE TO UTC STAFF DATA REQUEST NO. 1:

Thank you for providing us with the opportunity to clarify my testimony on this point at Exh. MM-01T 53:1–54:18.

PMSA recommends including in the revenue requirement as an allowable expense the amount of \$24,000 for "DEI Training Proposals" as described by PSP Work Papers per Exh. WTB-05, "DEI Expense" tab, B:14-E:15. PSP arranging for this DEI training for the pilot corps in concert with BPC efforts is a reasonable business expense.

PMSA recommends excluding from the revenue requirement all of the expenses for "Corporate Membership," "Membership," and "2022 Sponsorships," as described by PSP Work Papers per Exh. WTB-05, "DEI Expense" tab, B:18-E:30.

PMSA observes that the PSP Work Papers also include an item on "Art Auction to Support DEI Scholarships" at Exh. WTB-05, "DEI Expense" tab, B:33-E:37, but that no revenue requirement is listed as associated with this expense and as described the value is "-." PMSA concurs that the amount of allowable DEI expenses for this item should be \$0.

I would also add that my testimony at Exh. MM-01T 277:1–278:12 does not recommend including any additional allowable expenses in the revenue requirement for PSP either. Instead, I support future justified tariff allocations for DEI, but only if the DEI program costs are paid to the BPC for a public program as described. These are not proposed to be part of the current general rate case paid to PSP as part of a revenue requirement. The investment in a public program at BPC needs to be part of addressing broader DEI concerns in the maritime industry as a whole, and it is important that we are expanding awareness of opportunities to pursue diversity, equity, and inclusion across all of our professions. These efforts must include diversification in career pathways to pilotage, of course, but this is a much broader maritime sector challenge beyond individual organizations or just simply the question of individual pilot licensing in the Puget Sound.