

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

DATE PREPARED: February 24, 2023
DOCKET: TP-220513
REQUESTER: UTC Staff

WITNESS: Capt. Michael Moore
RESPONDER: Capt. Michael Moore,
Pacific Merchant Shipping Assn.

UTC STAFF DATA REQUEST NO. 3:

PMSA mentioned in conversation that the SILA fee in rates is set to expire in July.

- a. Please provide all supporting documentation demonstrating the rate expiration.
- b. Please also explain PMSA's recommendation for SILA rates proposed by the PSP.

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SILA charges are reflected in the PSP filed Work Papers in two separate respects: (1) at Exh. WTB-05, "Pro-Forma Entries" tab, Adjustment #P-14, in which PSP proposes to eliminate the \$150,000 SILA charge; and (2) at the PSP proposed Revised Tariff, "Board of Pilotage Commissioners SILA Surcharge," Item 380 – Special Surcharges, described as "A surcharge as required by WAC 363-116-301 shall be assessed in the following amount: \$16.00 per Vessel Movement."

- a. Pursuant to WAC 363-116-301, the self-insurance premium surcharge of \$16 per vessel will sunset and only be in effect through June 30, 2023. WAC 363-116-301 in its entirety reads:

WAC 363-116-301. New revenue collection.

With respect to the passage of section 107, chapter 333, Laws of 2021 (Substitute Senate Bill No. 5165), the board of pilotage commissioners is appropriated \$2,926,000 from the pilotage account state appropriation solely for self-insurance liability premium expenditures. This appropriation is contingent upon two stipulated conditions:

(1) The Puget Sound pilots shall pay to the board, from its tariffs, \$150,000 annually on July 1, 2021, and July 1, 2022. These amounts shall be deposited by the board into the pilotage account and used solely for the expenditure of self-insurance premiums; and

(2) A self-insurance premium surcharge of \$16 shall be added to each Puget Sound pilotage assignment on all vessels requiring

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pilotage in the Puget Sound pilotage district. The Puget Sound pilots shall remit the total amount of such surcharges generated to the board by the tenth of each month. The surcharge shall be in effect from July 1, 2021, through June 30, 2023. These amounts shall be in addition to those fees to be paid to the board pursuant to subsection (1) of this section and shall be deposited by the board into the pilotage account solely for the expenditure of self-insurance premiums. These two directives are in effect beginning May 18, 2021, through June 30, 2023.

- b. As noted above, there are two components to SILA: contributions made directly by PSP to BPC and the SILA vessel surcharge imposed by the tariff and passed through to BPC.

PMSA recommends the elimination of both charges consistent with the June 30, 2023 sunset date in WAC 363-116-301.

PSP has proposed only the elimination of the PSP SILA expense (Exh. WTB-05 Adjustment #P-14). PSP has not proposed the elimination of the SILA surcharge, as it proposes to continue to impose the SILA surcharge in its revised Tariff at Item 380.