



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division
PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

Via Electronic Mail Only

July 30, 2020

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
P.O. Box 47250
Olympia, WA 98504-7250

Received
Records Management
07/30/20 16:40
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: *Washington Utilities and Transportation Comm'n v. Puget Sound Pilots*
Docket TP-190976

Dear Mr. Johnson:

Commission Staff writes to request an extension of the discovery cutoff deadline in this case from July 30 to August 7, 2020. Staff further requests that the Commission impose a two-day turn-around time for response.

Staff may in the near future file a motion requesting the opportunity to file sur-rebuttal testimony, depending on PSP's responses to pending and future data requests.

Staff strongly urges the Commission to remind PSP that, by rule, parties to litigation before the Commission have an ongoing duty to supplement their respective data request responses. PSP breached that duty. Staff believes that some of the information contained in Exh. GQ-5T relating to pilotage income should have been disclosed as a supplement to Staff's prior data requests in this case.

Finally, because it is unlikely that the Commission will grant PMSA's Motion to Strike, Staff does not here address the merits of the motion.

Sincerely,

/s/ *Sally Brown*, WSBA No. 17094
Senior Assistant Attorney General
Office of the Attorney General
Utilities and Transportation Division
P.O. Box 40128, Olympia, WA 98504-0128
(360) 664-1193 / sally.brown@utc.wa.gov

SGB:klg
cc: Parties