

PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS Nos. 770-772

DATE PREPARED: March 22, 2023 DOCKET: TP-220513 REQUESTER: Pacific Merchant Shipping Association ("PMSA")	WITNESSES: PUGET SOUND PILOTS RESPONDER: CAPT. IVAN CARLSON PUGET SOUND PILOTS DATE: March 29, 2023 TEL: (360) 421-0583 EMAIL: president@pspilots.org
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PMSA DATA REQUEST NO. 770: As included in PSP's Initial Filing in this General Rate Case, Appendix B, Puget Sound Pilotage District Tariff Item 330 – Pilot Boat Charges, please address all of the following:

- (a) Admit that PSP has on occasion deviated from the specified rate for each embarkation and/or disembarkation of a pilot at Port Angeles pursuant Item 330 when charging customers.
- (b) Admit that PSP has on such occasions instead chosen to substitute indirect charges to customers for pilot embarkation/disembarkation at Port Angeles.
- (c) Admit that on such occasions the substitute indirect charges to customers were inconsistent with the rate designated at Item 330.
- (d) Admit that in doing so, PSP has charged, collected, or received pilotage rates or charges other than those established in the current Puget Sound Pilotage tariff.
- (e) If any (a)–(d) are denied, please state basis for denial.

RESPONSE:

- (a) Deny. PSP has only ever charged the specified rate or no rate at all depending on whether the pilot boat service has been provided or not.
- (b) Deny. PSP has not substituted any indirect charges to customers for pilot embarkation/disembarkation at Port Angeles.
- (c) Deny.
- (d) Deny.
- (e) On the rare occasions when PSP is unable provide pilot embarkation and disembarkation through the use of PSP-owned vessels, PSP has offered customer vessels the option of waiting for a PSP-owned vessel to be available for service or to embark or disembark the pilot using Arrow Launch, a UTC-regulated third-party launch service. Arrow Launch is the typical method to embark or disembark a pilot by sea in all locations throughout Puget Sound apart from Port Angeles where the PSP pilot boats are located. On these rare occasions, PSP waives its own pilot boat fee and Arrow Launch invoices ships for these services. Therefore, PSP neither substitutes indirect charges nor charges, collects, or receives pilotage rates or charges other than those established in the current tariff.

PMSA DATA REQUEST NO. 771: Further regarding Puget Sound Pilotage District Tariff Item 330 – Pilot Boat Charges, admit that billing practices of the PSP regarding this Tariff Item 330 have been the subject of a formal Complaint to the Utilities and Transportation Commission (UTC Complaint CAS-43379-N8Q5Q0). Please provide a copy of the Complaint and all related exhibits submitted with the Complaint.

RESPONSE:

Admit. Complaint attached hereto.

PMSA DATA REQUEST NO. 772: Further regarding Puget Sound Pilotage District Tariff Item 330 – Pilot Boat Charges, admit that PSP submitted a response to UTC Complaint CAS-43379-N8Q5Q0. Please provide a copy of the PSP Response and all related exhibits submitted with the Response.

RESPONSE:

Admit. Response attached hereto.

CERTIFICATE OF SERVICE

I further certify that on March 29, 2023, I provided an official electronic file containing Puget Sound Pilots' Responses to PMSA Data Requests Nos. 770-772 via e-Mail to the following parties:

<p>Jeff Roberson, Assistant Attorney General Nash Callaghan, Assistant Attorney General Office of the Attorney General P.O. Box 40128 Olympia, WA 98504-0128 J. Roberson: (360) 522-0614 N. Callaghan: (360) 915-4521 jeff.roberson@atg.wa.gov nash.callaghan@atg.wa.gov</p> <p><i>Representing Washington Attorney General's Office - Utilities and Transportation Division</i></p>	<p>Jeanne Roth Betsy DeMarco WUTC P.O. Box 47250 Olympia, WA 98504 (360) 664-1225 Jeanne.roth@utc.wa.gov Betsy.demarco@utc.wa.gov</p> <p>Representing Washington Attorney General's Office - Utilities and Transportation Division</p>
<p>Steven Block Lane Powell PC 1420 Fifth Avenue, Suite 4200 P.O. Box 91302 Seattle, WA 98111-9402 (206) 223-7718 BlockS@LanePowell.com</p> <p>Attorneys for TOTE Maritime Alaska, LLC</p>	<p>Michelle DeLappe Fox Rothschild 1111 Third Avenue, Suite 3000 Seattle, WA 98101 (206) 816-1403 MDelappe@foxrothschild.com seasalt@foxrothschild.com</p> <p>Counsel Representing Pacific Merchant Shipping Association</p>
<p>Monique Webber Pacific Yacht Management 2284 W. Commodore Way, Suite 120 Seattle, WA 98199 (206) 285-1449 monique@pacificyachtmanagement.com</p> <p>Representing Pacific Yacht Management</p>	<p>Jay Jennings Northwest Marine Trade Association 1900 N. Northlake Way, #233 Seattle, WA 98103 (206) 634-0911 jay@nmta.net</p> <p>Representing Northwest Marine Trade Association</p>

<p>Courtesy Service: president@pspilots.org mmoore@pmsaship.com mjacob@pmsaship.com ccostanzo@pspilots.org kmceachern@hk-law.com</p>	
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Signed at Portland, Oregon this 29th day of March, 2023.

s/ Kathleen G. McEachern
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