

PMSA DATA REQUEST NO. 380: Regarding your testimony in Exh. KAE-1T generally, provide a copy of the engagement agreement with PSP which procured your testimony in this matter.

RESPONSE: Copy of agreement between PSP and IHS Markit attached.

PMSA DATA REQUEST NO. 390: Regarding Exh. KAE-4, tab “Exports by Port,” as the data table is labeled “Source: IHS Markit” but the data chart is labeled “Source: IHS Markit’s Global Trade Atlas,” please clarify the ultimate source of the data labeled “Source: IHS Markit” by providing copies of the source data documentation referenced as “Source: IHS Markit’s Global Trade Atlas,” and further disclose whether any of the data used to develop this data set was provided by Puget Sound Pilots.

RESPONSE: The data table on the “Exports by Port” tab or worksheet is sourced through IHS Markit’s Global Trade Atlas. The Puget Sound Pilots provided no data on the “Exports by Port” tab or worksheet.

The “GTA Forecasting FAQ-Historical Data Processing” is attached and documents the source data for the Global Trade Atlas, as available to clients on the Connect platform, [https://connect.ihsmarket.com/document/show/phoenix/2756530?connectPath=TradePortal.Meth
odologyAndGlossary](https://connect.ihsmarket.com/document/show/phoenix/2756530?connectPath=TradePortal.MethodologyAndGlossary) .

PMSA DATA REQUEST NO. 391: Regarding Exh. KAE-4, tab “Exports by Port,” as the data table is labeled “Source: IHS Markit” but the data chart is labeled “Source: IHS Markit’s Global Trade Atlas,” please clarify the ultimate source of the data labeled “Source: IHS Markit” by providing copies of the source data documentation referenced as “Source: IHS Markit’s Global Trade Atlas,” and further disclose whether any of the data used to develop this data set was provided by Puget Sound Pilots.

RESPONSE: Duplicate of DR No. 390.

PMSA DATA REQUEST NO. 392: Regarding Exh. KAE-4, tab “Assignments by Vessel Class,” as the data table is labeled “Source: IHS Markit” but the data chart is labeled “Source: Puget Sound Pilots,” please clarify the ultimate source of the data labeled “Source: IHS Markit” by providing copies of the source data documentation referenced as “Source: Puget Sound Pilots,” and further confirm that all of the data used to develop this data set was provided by Puget Sound Pilots.

RESPONSE: The data was sourced from the Puget Sound Pilots and transformed into summary format by IHS Markit.

PMSA DATA REQUEST NO. 393: Regarding Exh. KAE-4, tab “Gross Tonnage by Vessel Class,” as the data table is labeled “Source: IHS Markit” but the data chart is labeled “Source: Puget Sound Pilots,” please clarify the ultimate source of the data labeled “Source: IHS Markit” by providing copies of the source data documentation referenced as “Source: Puget Sound Pilots,” and further confirm that all of the data used to develop this data set was provided by Puget Sound Pilots.

RESPONSE: The data was sourced from the Puget Sound Pilots and transformed into summary format by IHS Markit.

PMSA DATA REQUEST NO. 394: Regarding Exh. KAE-4, tab “Average Gross Tonnage by Vessel Class,” as the data table is labeled “Source: IHS Markit” but the data chart is labeled “Source: Puget Sound Pilots,” please clarify the ultimate source of the data labeled “Source: IHS Markit” by providing copies of the source data documentation referenced as “Source: Puget Sound Pilots,” and further confirm that all of the data used to develop this data set was provided by Puget Sound Pilots.

RESPONSE: The data was sourced from the Puget Sound Pilots and transformed into summary format by IHS Markit.

PMSA DATA REQUEST NO. 400: Regarding Exh. KAE-4, tab “Summary by Pilot Group,” as the data table includes no data sources but the data chart is labeled “Source: IHS Markit,” please clarify the ultimate source of the data by providing copies of all of the source data used to create the data table, including all assumptions, formulas, calculations, and references to pilotage tariffs utilized, and copies of the specific provisions of the pilotage tariffs referenced, and further confirm whether none, any, or all of the data used to develop this data set was provided by Puget Sound Pilots.

RESPONSE: The data used on the “Summary by Pilot Group” was provided by the Puget Sound Pilots.

PMSA DATA REQUEST NO. 401: Regarding Exh. KAE-4, tab “Proposed vs Other Pilot Groups,” as the data table includes no data sources but the data charts are labeled “Source: IHS Markit,” please clarify the ultimate source of the data by providing copies of all of the source data used to create the data table, including all assumptions, formulas, calculations, and references to pilotage tariffs utilized, and copies of the specific provisions of the pilotage tariffs referenced, and further confirm whether none, any, or all of the data used to develop this data set was provided by Puget Sound Pilots.

RESPONSE: Data provided by PSP and analyzed by IHSM.

PMSA DATA REQUEST NO. 404: Regarding Exh. KAE-1T 4:14–17, please clarify your testimony: is the statement that “[i]mport volumes have relatively [sic] constant over the past five years, with no noticeable disruption because of Covid-19 in 2020 or 2021” meant to be applicable to the entire U.S. West Coast or to the Puget Sound?

RESPONSE: The sentence should read: “US West Coast import volumes have been relatively constant over the past five years, with no noticeable disruption because of Covid-19 in 2020 or 2021.”

PMSA DATA REQUEST NO. 406: Regarding Exh. KAE-1T 6:15–18, please clarify your testimony: is the statement that “[o]verall, since 2016 there has been a slightly declining trend for assignments, total gross tonnage and average gross tonnage,” meant to be applicable to only cruise ship traffic or to total vessel traffic in the Puget Sound?

RESPONSE: The sentence should read, “Overall, since 2016 there has been a slightly declining trend for assignments, total gross tonnage and average gross tonnage across many of the vessel types.”

PMSA DATA REQUEST NO. 407: Regarding Exh. KAE-1T 6:21–26, please respond to each of the following:

- 1) Define “ship traffic volatility.”
- 2) Describe the quantitative standards used to measure ship traffic volatility, including how the “multiple factors” referenced in the testimony inform these standards.
- 3) Describe the analysis and apply the quantitative standards described which result in the conclusion that Puget Sound ship traffic volatility is “quite volatile.”
- 4) Describe the baseline of Puget Sound ship traffic volatility over the “last 15 years” against which current ship traffic volatility is comparatively “quite volatile.”

Describe the baseline ship traffic volatility standard for other ports around the country against which ship traffic volatility in the Puget Sound is comparatively “quite volatile.”

RESPONSE:

- 1) Volatility is an unpredictable or unstable environment or situation that leads to a corresponding change in volume or price of something from one period to the next.
- 2) A rate of change in absolute levels or percent change in ship calls, types of vessels or volumes discharged or loaded.
- 3) Volatility was shown in grain and soybean exports that impacted vessel calls and loadings, which was used for analysis in my report.
- 4) As global markets expand and contract from one period to another, consumer purchasing behavior is influenced that either contracts or expands as well. For example, as consumers purchase less goods and products, that means there is less to be produced. As less is produced there is less to be shipped. As described with grain and soybean exports when China started culling pigs because of African Swine Fever, there was less demand for feed ingredients such as soybean meal. With less soybean meal demand there was a slowdown in crushing soybeans for soybean meal and soybean oil. Because China is a large importer of soybeans from the United States, including the Puget Sound, ship volumes dropped as a result. Moreover, the US-China trade dispute further interrupted grain and soybean and product exports to China, again, further impacting ship volumes.

PMSA DATA REQUEST NO. 408: Regarding Exh. KAE-1T 6:26–7:2, stating that “[t]he chart below, which tracks global financial stress factors, typically matches up with significant changes in international trade, most of which is carried by oceangoing vessel,” please respond to each of the following:

- 1) Submit the evidence, data, and charts to support the conclusion that the global Financial Stress Indicator chart “tracks” significant changes in international trade.
- 2) Describe the relationship between global financial stress and significant changes in international trade in a quantifiable way such that it is possible to evaluate the strength of the correlation between global financial stress factors and changes in international change.
- 3) Describe how the correlation between global financial stress factors and changes in international change are reflected in the oceangoing vessel traffic.
- 4) Quantify how this correlation relates to the standards by which the volatility of ship traffic are measured as described in response to DR 407.
- 5) Demonstrate the application of this quantification with respect to volatility of vessel traffic generally.
- 6) Describe how this quantification is prepared for ship traffic in Puget Sound and, if it is “quite volatile” when compared to the baseline volatility of vessel traffic generally, explain why.

RESPONSE:

The analysis is fairly simple. It stands to reason that as there are economic downturns as an example, there is an increase in unemployment, spending on capital investments reduced, housing sales slow, and consumer spending is negatively impacted. Such slowing or negative impacts lead to less need for consumption of commodities, goods and products from one period to the next. This leads to a corresponding slowing of manufacturing and production of those goods and products, and penultimately the international trade of those goods and products between countries is lower. As international trade slows then oceangoing vessel traffic is negatively impacted. Because the ports located on the Puget Sound are major gateways of international trade between the United States and the global marketplace, an economic disaster such as the global financial crisis curtails trade volumes and oceangoing vessel traffic. Similarly, as with the US and China trade dispute, volumes dropped leading to lower vessel traffic. Conversely, as economic conditions improve, consumer spending increases, international trade between trading partners increases, which supports oceangoing vessel traffic.

PMSA DATA REQUEST NO. 409: Regarding Exh. KAE-1T 7:25–10:15, in which you answer the question “Do manufacturing supplier delivery times contribute to the volatility of international ship traffic?” starting with “Yes, the two charts immediately below tell the story,” please respond to each of the following:

- 1) Submit the evidence, data, and charts to support the conclusion that the manufacturing suppliers’ delivery times and delays contribute to the volatility of ship traffic.
- 2) Describe the relationship between supplier delivery times and ship traffic volatility in a quantifiable way such that it is possible to evaluate the strength of the correlation between manufacturing supplier delivery and volatility of ship traffic.
- 3) Quantify how this correlation relates to the standards by which the volatility of ship traffic are measured as described in response to DR 407.
- 4) Demonstrate the application of this quantification with respect to volatility of vessel traffic generally.
- 5) Describe how this quantification is prepared for ship traffic in Puget Sound and, if it is “quite volatile” when compared to the baseline volatility of vessel traffic generally, explain why.

RESPONSE: The answer to No. 408 applies to this data request, using the Manufacturing Purchasing Manager’s Index as an illustration. The increase in delivery times leads to impacts commodity, goods, and product shipments. Delivery time interruptions revealed vulnerabilities in the supply chain while trying to account for changed demand requirements for commodities, goods and products from one period to the next. Changing delivery times impact vessel sailings such that vessels were ordered to bypass ports, sail blank or to bunch in various locations. The ports located on the Puget Sound are key international trade gateways. Those gateways are dependent on timely and orderly vessel callings and with interruptions in the supply chain that led to changes in oceangoing vessel traffic from one period to another.

PMSA DATA REQUEST NO. 410: Regarding Exh. KAE-1T 10:15–13:15, admit that none of the testimony related to the volatility for U.S. grain and soybean exports through Puget Sound export grain elevators is correlated with volatility of ship traffic. If denied, please identify the specific portions of this testimony which correlate volatility in the grain and soybean export markets with volatility of ship traffic.

RESPONSE: See answer to No. 407

PMSA DATA REQUEST NO. 411: Regarding Exh. KAE-1T 14:1–13, please provide a specific citation and a copy of the original document from which this table labeled “All Container Vessel Export of Agricultural Fishery and Wood Products via Puget Sound” was obtained.

RESPONSE: IHS Markit’s Global Trade Atlas is the source for this table. It is a compilation from the GTA database based on a specific query of container loadings of agricultural fishery and wood products through via the Puget Sound. The Global Trade Atlas was discussed in my response to No. 390.

PMSA DATA REQUEST NO. 417: Regarding Exh. KAE-1T 16:3, admit that none of the testimony which purports to be related to the volatility of ship traffic analyzes or provides any data on the basis of the “highly diverse character of the vessel traffic calling Puget Sound ports and terminals.” If denied, please identify the specific portions of this testimony which correlate diversity amongst vessel types with volatility of ship traffic.

RESPONSE: Deny. The types of vessels as described and shown in in Exh. KAE-1T 5-6 (bulker, car carrier, container, general, naval, other, passenger, reefer, roro, and tanker) serving Puget Sound and the cargoes and people hauled, moved, or transported on or by those vessels are tied to regional, national, and global economies. Those economies experience disruptions that impact consumer purchasing, which in turns impacts commodities and products manufactured and shipped as trade between geographies. The Puget Sound has ports that serve vessels carrying that trade. Any changes to trade impacts vessel movements.

PMSA DATA REQUEST NO. 418: Regarding Exh. KAE-1T 16:4–5, stating “that it is not realistic to predict with any degree of certainty the volume of vessel traffic annually in Puget Sound,” please respond to each of the following:

- 1) Define the term “any degree of certainty.”
- 2) Describe the method by which you evaluated the degree of certainty in vessel traffic predictions can be quantified and evaluated, or admit that you did not develop such a methodology.
- 3) Describe the analysis by which you applied the definition and methodology as described above in order to reach the determination that such predictions were unrealistic, or admit that you did not perform such an analysis.

RESPONSE:

- 1) Any degree of certainty can be viewed as a level of confidence of an outcome.
- 2) Regional, national and global economies experience unexpected events that make it difficult to give any degree of certainty of predictions. Looking at past events and activity related to changes from one period to another is a tool to observe uncertainty in vessel traffic.
- 3) The analysis is fairly simple. It stands to reason that comparing one period to another and taking into regional, national and global events do have impacts on vessel traffic.

PMSA DATA REQUEST NO. 419: Regarding Exh. KAE-1T 16:7–14, please describe with specificity why the different classes of vessel types calling Puget Sound is a factor in making it “impossible to predict vessel traffic,” and cite where this description is found “explained above” at pages 1–16 of your testimony.

RESPONSE: Not all vessels are the same, and each has a specific purpose. There are many types of vessels calling ports on the Puget Sound and each has a purpose for the service and trade intended. It is impossible to accurately predict the exact vessel mix and commodity, good or product to be shipped with a high degree of certainty as explained page 6 through page 15 of my testimony.

PMSA DATA REQUEST NO. 420: Regarding Exh. KAE-1T 16:7–14, please describe with specificity what the “multiple unpredictable factors affecting the traffic level for each ship type” are and why these factors contribute to a conclusion that it is “impossible to predict vessel traffic,” and cite where this description is found “explained above” at pages 1–16 of your testimony.

RESPONSE: Using a simple rolling average smooths out patterns but misses volatility in movements from one period to another. As answered in No. 419 each vessel has a purpose and service and trade intended. It is impossible to accurately predict the exact vessel mix and commodity, good or product to be shipped with a high degree of certainty as explained page 6 through page 15 of my testimony.

PMSA DATA REQUEST NO. 421: Regarding Exh. KAE-1T 16:7–14, admit that it is your testimony that it is “impossible to predict vessel traffic on the basis of the past.” If denied, please explain.

RESPONSE: Admit.

PMSA DATA REQUEST NO. 422: Further with respect to DR 421, please admit to each of the following:

- 1) Admit that public port authorities predict vessel traffic when building port and terminal facilities and that it would be imprudent not to consider the basis of past vessel traffic when making such predictions.
- 2) Admit that marine terminal operator tenants predict vessel traffic when operating port and terminal facilities and that it would be imprudent not to consider the basis of past vessel traffic when making such predictions.
- 3) Admit that ocean carriers predict vessel traffic when scheduling vessel services to port and terminal facilities and that it would be imprudent not to consider the basis of past vessel traffic when making such predictions.
- 4) Admit that vessel owners predict vessel traffic when deciding to initiate the new construction of ocean-going vessels and that it would be imprudent not to consider the basis of past vessel traffic when making such predictions.
- 5) Admit that underwriters and financiers predict vessel traffic when financing and underwriting port, terminal, and vessel capital improvements and operations and that it would be imprudent not to consider the basis of past vessel traffic when making such predictions.

RESPONSE:

Admit to subsections 1 through 5. “Past vessel traffic” is an appropriate consideration for each of the decision-makers identified above, which necessarily also includes appropriate consideration of past events, market conditions, economic considerations, and investment in infrastructure. Accurately predicting vessel traffic for capital and infrastructure investment is impossible. Instead forecasts scenarios are used to provide parameters around the sensitivity on outcomes. The scenarios lend themselves to having high, low base cases.

PMSA DATA REQUEST NO. 424: Further with respect to DR 421, please respond to all of the following:

- 1) Do you agree that predictions on vessel traffic can rely on long-term cargo forecasts?
- 2) Do you agree that predictions on vessel traffic rely on long-term economic and trade analysis?
- 3) Do you agree that it is possible to identify likely cargo outlooks that closely correspond to historical trends and other expert projections?
- 4) Do you agree that it is possible to complete model-based long-term forecasts of cargo based on the components of real gross domestic product (GDP), including consumer spending, business capital spending, imports, and exports?
- 5) Do you agree that it is possible to establish methodologies for developing disaggregated predictions across industries and trade categories in order to evaluate multiple plausible outcomes for vessel traffic?
- 6) Do you agree that it is possible to analyze potential future productivity scenarios for port and terminal facilities?

RESPONSE: Agree to all parts. Long-term cargo forecasts are important and are used to guide and direct investment and resource allocations. As explained for No. 422, using scenario forecasts are valuable to provide a range of outcomes, high, low and a base case.

PMSA DATA REQUEST NO. 426: Regarding Exh. KAE-1T 16:24–25, please provide the numeric value of “the known probability of traffic volatility.”

RESPONSE:

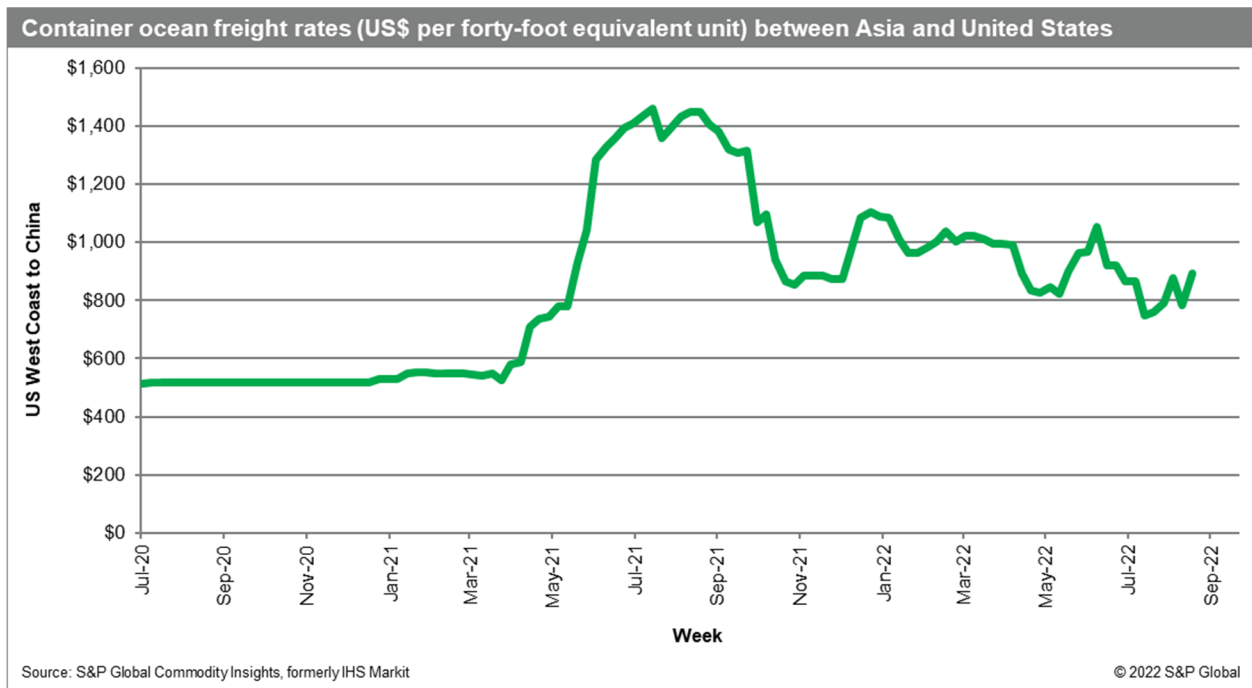
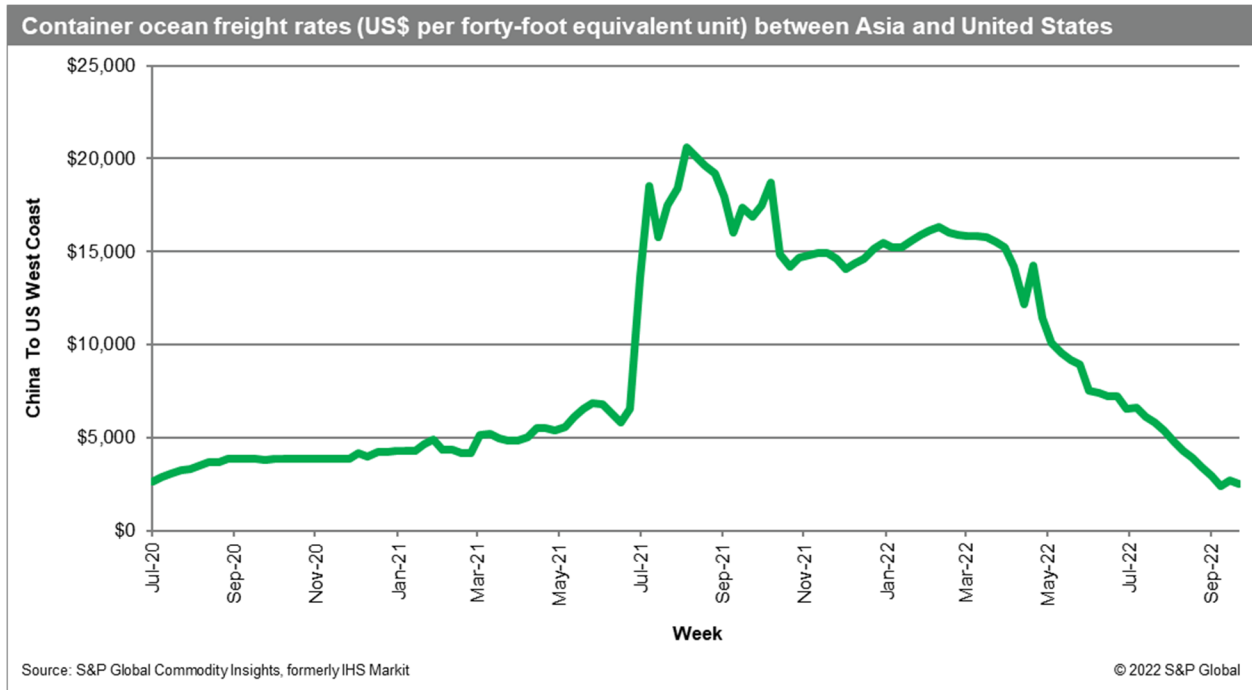
I have not attempted to develop a numeric value for “the known probability of traffic volatility,” which was not included in the scope of work under IHS Markit’s contract with PSP.

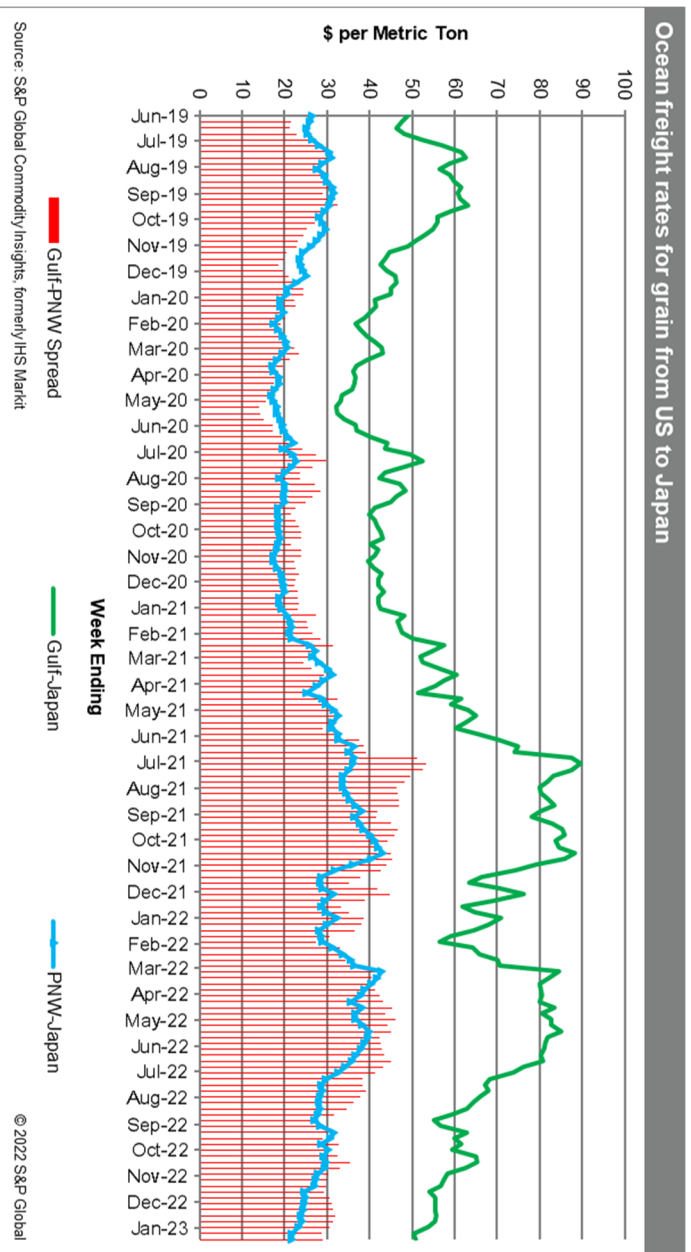
PMSA DATA REQUEST NO. 427: Regarding Exh. KAE-1T 16:24–25, please describe why the knowledge of a probability of traffic volatility “makes use of a moving average inappropriate.”

RESPONSE: If policy goal of a tariff is to consistently generate the approved revenue requirement on an annual basis, the use of a moving average to derive the traffic variable in Puget Sound is inappropriate due to the significant volatility of vessel traffic from one period to the next.

PMSA DATA REQUEST NO. 429: Regarding Exh. KAE-1T 17:10–19:12, please provide updated data for these three charts through the latest available data set in the possession of IHS Markit.

RESPONSE:





PMSA DATA REQUEST NO. 430: Regarding Exh. KAE-1T 31:19–21, please respond to each of the following:

- 1) Identify who provided the data for the charges analyzed in this section.
- 2) Correct the source for the data identified in the subsequent charts at pages 32–38 if the data was provided by a source other than “Source: IHS Markit.”
- 3) Provide copies of all the data that was provided.
- 4) Identify exactly to whom and when the data was provided.
- 5) Describe the process undertaken by you, if any, prior to offering this testimony to independently assess the accuracy and completeness of any data provided to you.
- 6) Provide copies of any documents demonstrating your efforts to verify the accuracy and completeness of the data provided to you. (If not noted on the documents, please also provide the date(s) each was prepared.)

RESPONSE:

- 1) PSP provided the data to IHS Markit.
- 2) Acknowledge, source data should be Puget Sound Pilot.
- 3) Data previously provided and is available on Summary by Pilot Group.
- 4) Puget Sound Pilots
 - a. Excel file: “change in rates for Mike.xlsx,” from Michael Haglund, June 25, 2022
 - b. Excel file: “Master Comparative Vessel Transit.xlsx,” Michael Haglund, April 21, 2022
- 5) I reviewed and assessed the data and did not see any basis to question its accuracy.
- 6) Attached Excel files sent to IHS Markit.
 - a. Change in rates for Mike.xlsx
 - b. Master Comparative Vessel Transit.xlsx

PMSA DATA REQUEST NO. 431: Regarding Exh. KAE-1T 31:20, please respond to each of the following:

- 1) Describe the basis for only comparing shipping volume data at “major port clusters on the West Coast.”
- 2) Define “major port cluster.”
- 3) Describe the basis for inclusion of the Port of Vancouver, British Columbia, Prince Rupert, British Columbia, and Grays Harbor on your list of major West Coast ports.
- 4) Does the San Francisco port cluster include all ports in the San Francisco Bay and River system in addition to Oakland and San Francisco?
- 5) Does the Los Angeles port cluster include both Los Angeles and Long Beach?

RESPONSE:

- 1) As answered in No. 403, the major ports reflect key ports with multiple types of vessels and cargo being handled.
- 2) As answered in No. 403, a port cluster could include multiple ports or as defined through the Global Trade Atlas.
- 3) The inclusion of other ports is that the data for those ports were available.
- 4) No.
- 5) No. Pilotage services in the Port of Long Beach are provided by Jacobsen Pilot Services, Inc., a private company that does not make its pilotage invoices available.

PMSA DATA REQUEST NO. 432: Regarding the multiple charts on pages Exh. KAE-1T 32–38, please respond to each of the following:

- 1) Describe why these charts do not maintain consistent ports for all vessel type comparisons. (For example, at page 32: The chart for “Pilotage Fees by Pilot Group for Large Container Vessel” includes fees for Puget Sound, British Columbia, British Columbia Prince Rupert, San Francisco, and Los Angeles. But the chart for “Pilotage Fees by Pilot Group for Medium Container Vessel” includes Puget Sound, British Columbia, British Columbia Prince Rupert, and San Francisco, but omits Los Angeles, and adds Columbia River Bar, Columbia River, and Columbia River and Bar.)
- 2) Define “large container vessel” including its size specifications.
- 3) Define “medium container vessel” including its size specifications.
- 4) Define “seven hold dry bulk vessel” including its size specifications.
- 5) Define “five hold dry bulk vessel” including its size specifications.
- 6) Define “large tanker vessel” including its size specifications.
- 7) Define “small tanker vessel” including its size specifications.
- 8) Define “ATB vessel” including its size specifications.
- 9) Define “large passenger vessel” including its size specifications.
- 10) Define “per hour.”
- 11) Describe the methodology for determining a “per hour” factor for each pilot group evaluated per hour (including Puget Sound, British Columbia, British Columbia Prince Rupert, San Francisco, Los Angeles, Columbia River Bar, Columbia River, Columbia River and Bar, Grays Harbor).
- 12) Describe the “per hour” calculation and quantification for each pilot group.
- 13) Define “per mile.”
- 14) Describe the methodology for determining a “per mile” factor for each pilot group evaluated per mile (including Puget Sound, British Columbia, British Columbia Prince Rupert, San Francisco, Los Angeles, Columbia River Bar, Columbia River, Columbia River and Bar, Grays Harbor).
- 15) Describe the “per mile” calculation and quantification for each pilot group.
- 16) Disclose whether these definitions and values were derived and calculated by you as part of your evaluation and, if not, when and by whom were these definitions and values were provided to you.

RESPONSE:

- 1) Pilotage fees were not available for all vessel types for all ports.
- 2) 140,000 IGT
- 3) 55,000 IGT
- 4) 44,000 IGT
- 5) 21,000 IGT

- 6) 85,000 IGT
- 7) 29,000 IGT
- 8) 14,000 IGT
- 9) 168,000 IGT
- 10) Actual pilot service time in hours or parts thereof.
- 11) Puget Sound Pilots: actual service time as outlined in tariff; British Columbia and Prince Rupert: same as RSP; all others: estimated average of service time provided by RSP.
- 12) See response to 11.
- 13) The distance the pilot was on the vessel.
- 14) Distance from pilot station to final destination with mileage calculated from applicable nautical chart.
- 15) See response to 14.
- 16) Distance and hour calculations were included in data file sent to IHS Markit.

PMSA DATA REQUEST NO. 433: Regarding Exh. KAE-1T 39:10–11, claiming to “show the actual costs of the PSP pilotage rates to container vessels on the basis of cost per TEU,” admit that the calculations for these charges are entirely hypothetical and are not based on the “actual costs” of any container vessel. If denied, please identify where the actual cost to a container vessel is included in your testimony or exhibits.

RESPONSE:

Admit. The per TEU calculation is illustrative based on the twenty-foot equivalent container capacity of a vessel.

PMSA DATA REQUEST NO. 434: Regarding Exh. KAE-1T 39:10–11, claiming to “show the actual costs of the PSP pilotage rates to container vessels on the basis of cost per TEU,” admit that the calculations for these charges are entirely hypothetical and are based on the “Summary Pilot Fees” tab of Exh. KAE-4, which assumes for a Large Container Vessel a port-transaction volume of 13,200 TEUs.

RESPONSE:

Admit.

PMSA DATA REQUEST NO. 435: Further regarding DR 434, admit that the “actual cost” to a Large Container Vessel as projected here would only be accurate if a vessel with a capacity of 13,200 TEUs conducted business at a Puget Sound port such that its port-transaction volume equaled its entire capacity.

RESPONSE:

Admit. The per TEU calculation is illustrative based on the twenty-foot equivalent container capacity of a vessel.

PMSA DATA REQUEST NO. 436: Further regarding DR 434, admit that it would be an exceptional event which has likely never occurred for a Large Container Vessel with a capacity of 13,200 TEUs conducting business at a Puget Sound port to engage in a port-transaction volume which equals the vessel's entire capacity.

RESPONSE:

Admit. However, it is worth noting, the 13,200 TEU vessel was not the largest to call on the Puget Sound. The MV Benjamin Franklin, a 17,859 TEU container vessel first called on the Port of Seattle for discharge and loading operations in February 2016.

PMSA DATA REQUEST NO. 437: Regarding Exh. KAE-1T 41:1, please define “completely insignificant.”

RESPONSE: The cost of the PSP on a per unit basis is infinitesimally small in comparison to the overall revenue (ocean freight rate per unit carried times volume carried).

PMSA DATA REQUEST NO. 438: Regarding Exh. KAE-1T 41:2–5, please identify the “maritime industry academics” referenced.

RESPONSE:

As cited, Martin Stopford.

PMSA DATA REQUEST NO. 440: Regarding Exh. KAE-1T 41:2–5, admit that pilotage costs are part of the port costs incurred on a vessel voyage and not part of the oceangoing costs incurred on a vessel voyage.

RESPONSE:

Admit.