

PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS Nos. 742-761

DATE PREPARED: March 17, 2023 DOCKET: TP-220513 REQUESTER: Pacific Merchant Shipping Association ("PMSA")	WITNESSES: KEN ERIKSEN RESPONDER: KEN ERIKSEN PUGET SOUND PILOTS DATE: March 24, 2023 TEL: (901) 766-4463_ EMAIL: <a href="mailto:ken.eriksen@ihsmarkit.com">ken.eriksen@ihsmarkit.com</a>
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**PMSA DATA REQUEST NO. 742:** Admit that you provided the following response to PMSA DRs 390–391, regarding the request to produce the source data documentation identified as “HIS Markit’s Global Trade Atlas:

The data table on the “Exports by Port” tab or worksheet is sourced through HIS 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.ihsmarkit.com/document/show/phoenix/2756530?connectPath=TradePortal.MethodologyAndGlossary>.

**RESPONSE:**

Admit.

**PMSA DATA REQUEST NO. 743:** Admit that this Global Trade Atlas link leads to a log-in page that only provides access to the source data documentation to clients, and not to the public at-large, including PMSA.

**RESPONSE:**

Admit.

**PMSA DATA REQUEST NO. 744:** Admit that neither physical copies nor electronic and online access to source data documentation referenced as “Source: IHS Markit’s Global Trade Atlas” was ever provided in response to DRs in support of your testimony in this case. If denied, please demonstrate the provision of such documentation.

**RESPONSE:**

Deny. In response to DR 390, I identified this data and noted that the data table on the "Exports by Port" table or worksheet is sourced through the IHS Markit's Global Trade Atlas and was available to clients on a platform for which I provided the link. PMSA has made no effort to become an IHS Markit client and gain access to this proprietary database, which is provided only to clients who agree to the terms of a nondisclosure agreement and pay the fees necessary to gain access to this database.

**PMSA DATA REQUEST NO. 745:** If the failure to provide access to the Global Trade Atlas datasets in prior responses to PMSA DRs was an oversight, please confirm and provide access details in response to this Data Request, or in the alternative, if it was intentionally not provided, please confirm.

**RESPONSE:**

N/A.

**PMSA DATA REQUEST NO. 746:** Regarding Exh. KAE-05T 2:1, where you state, “we were provided data regarding those changes in pilotage rates,” please identify whether the data referred to was provided by the Puget Sound Pilots. If not, please identify the source that provided you with the data.

**RESPONSE:**

The data was provided by the Puget Sound Pilots.

**PMSA DATA REQUEST NO. 747:** Regarding Exh. KAE-05T 2:2-4, admit that the data charts “updated” at pages 2–11 and labeled “Source: IHS Markit” were all based on the data provided by the parties identified in response to DR 746.

**RESPONSE:**

Admit.

**PMSA DATA REQUEST NO. 748:** Regarding Exh. KAE-05T 1:15-24, admit that the basis for the data charts “updated” at pages 2–11 was in response to changes which have occurred since June 29, 2022.

**RESPONSE:**

Admit.

**PMSA DATA REQUEST NO. 749:** Admit that shipping industry data and economic analysis addressing shipping volume data at major West Coast ports has changed since June 29, 2022.

**RESPONSE:**

Admit.



**PMSA DATA REQUEST NO. 750:** Admit that shipping industry data and economic analysis addressing substantial increases in ocean freight rates has changed since June 29, 2022.

**RESPONSE:**

Admit.

**PMSA DATA REQUEST NO. 751:** Admit that shipping industry data and economic analysis addressing shipping industry profits has changed since June 29, 2022.

**RESPONSE:**

Admit.

**PMSA DATA REQUEST NO. 752:** Admit that shipping industry data and economic analysis addressing ship traffic volatility in Puget Sound has changed since June 29, 2022.

**RESPONSE:**

Admit.

**PMSA DATA REQUEST NO. 756:** Please provide an updated chart of “All Container Vessel Export of Agricultural Fishery and Wood Products via Puget Sound” originally provided at Exh. KAE-1T 14:1-12.

**RESPONSE:**

Updated chart below:

All Container Vessel Export of Agricultural Fishery and Wood Products via Puget Sound											
Product/Port	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
<b>Cereals (HS 10)</b>	<b>274,586</b>	<b>248,497</b>	<b>244,287</b>	<b>185,981</b>	<b>298,640</b>	<b>355,438</b>	<b>574,003</b>	<b>437,602</b>	<b>300,144</b>	<b>205,392</b>	<b>147,254</b>
Seattle, WA	126,111	151,535	105,229	50,460	59,403	83,692	154,569	110,877	107,490	154,324	86,729
Tacoma, WA	148,475	96,962	139,058	135,521	239,237	271,746	419,434	326,725	192,654	51,068	60,525
<b>Oilseeds (HS 12)</b>	<b>1,830,613</b>	<b>1,719,814</b>	<b>1,593,708</b>	<b>1,795,468</b>	<b>2,277,182</b>	<b>2,503,029</b>	<b>2,667,202</b>	<b>2,557,959</b>	<b>2,264,416</b>	<b>2,199,300</b>	<b>1,963,955</b>
Seattle, WA	822,950	761,509	614,971	703,807	745,924	961,661	993,676	991,610	872,146	913,330	647,077
Tacoma, WA	1,007,663	958,305	978,737	1,091,661	1,531,258	1,541,368	1,673,526	1,566,349	1,392,270	1,285,970	1,316,878
<b>Wood &amp; Paper Products (HS 44, 47, 48 &amp; 49)</b>	<b>2,434,530</b>	<b>2,725,672</b>	<b>2,590,657</b>	<b>2,310,120</b>	<b>2,704,547</b>	<b>2,810,177</b>	<b>2,694,975</b>	<b>2,380,988</b>	<b>1,954,633</b>	<b>1,655,777</b>	<b>1,215,868</b>
Seattle, WA	1,290,349	1,205,295	1,086,029	954,122	1,055,587	1,229,297	1,164,047	975,872	852,246	718,917	456,208
Tacoma, WA	1,144,181	1,520,377	1,504,628	1,355,998	1,648,960	1,580,606	1,530,928	1,405,116	1,102,387	936,860	759,660
Anacortes, WA	0	0	0	0	0	274	0	0	0	0	0
<b>Fruit &amp; Vegetables (HS 7 &amp; 8)</b>	<b>890,853</b>	<b>885,600</b>	<b>1,104,606</b>	<b>1,078,926</b>	<b>1,095,014</b>	<b>1,179,357</b>	<b>1,015,618</b>	<b>1,109,057</b>	<b>1,120,955</b>	<b>783,657</b>	<b>506,791</b>
Seattle, WA	628,241	516,615	708,754	672,191	634,093	680,035	503,206	639,209	787,788	509,299	245,572
Tacoma, WA	262,612	368,985	395,852	406,735	460,921	499,322	512,412	469,823	333,165	274,358	261,219
Anacortes, WA	0	0	0	0	0	0	0	25	2	0	0
<b>Preparations of Fruit &amp; Vegetables (HS 20)</b>	<b>841,683</b>	<b>770,240</b>	<b>820,613</b>	<b>780,345</b>	<b>911,954</b>	<b>908,476</b>	<b>913,065</b>	<b>970,185</b>	<b>760,111</b>	<b>718,780</b>	<b>611,420</b>
Seattle, WA	445,828	323,962	303,049	251,985	300,739	347,962	390,641	423,228	324,780	314,372	179,521
Tacoma, WA	395,855	446,278	517,564	528,360	611,215	560,514	522,424	546,957	435,331	404,408	431,899
<b>Animal Feed &amp; Other (HS 23)</b>	<b>535,320</b>	<b>746,607</b>	<b>596,165</b>	<b>555,559</b>	<b>909,888</b>	<b>522,484</b>	<b>1,132,831</b>	<b>995,038</b>	<b>973,103</b>	<b>626,674</b>	<b>441,135</b>
Seattle, WA	200,880	397,380	198,847	193,895	223,045	158,920	369,283	264,696	318,106	258,072	151,854
Tacoma, WA	334,440	349,227	397,318	361,631	686,843	363,564	763,548	730,342	654,997	368,602	289,281
Anacortes, WA	0	0	0	33	0	0	0	0	0	0	0
<b>Other</b>	<b>966,325</b>	<b>966,990</b>	<b>1,024,195</b>	<b>844,622</b>	<b>941,736</b>	<b>1,013,788</b>	<b>1,030,505</b>	<b>917,474</b>	<b>997,274</b>	<b>938,348</b>	<b>669,049</b>
Seattle, WA	536,908	442,601	446,698	360,410	414,927	525,157	549,156	490,131	514,989	501,384	349,949
Tacoma, WA	429,417	524,389	577,497	484,245	526,785	488,631	481,349	427,343	482,285	436,937	319,100
Anacortes, WA	0	0	0	-33	24	0	0	0	0	27	0
<b>Total Agriculture Shpments</b>	<b>7,773,910</b>	<b>8,063,420</b>	<b>7,974,231</b>	<b>7,551,021</b>	<b>9,138,961</b>	<b>9,292,749</b>	<b>10,028,199</b>	<b>9,368,303</b>	<b>8,370,636</b>	<b>7,127,928</b>	<b>5,555,472</b>
Seattle, WA	4,051,267	3,798,897	3,463,577	3,186,870	3,433,718	3,986,724	4,124,578	3,895,623	3,777,545	3,369,698	2,116,910
Tacoma, WA	3,722,643	4,264,523	4,510,654	4,364,151	5,705,219	5,305,751	5,903,621	5,472,655	4,593,089	3,758,203	3,438,562
Anacortes, WA	0	0	0	0	24	274	0	25	2	27	0

Notes: Agricultural, fishery and wood products includes HS codes 1,2,3,4,7,8,9,10,11,12,13,15,16,17,18,19,20,21,22,23,24,33,44,47,48,49

Source: Global Trade Atlas

**PMSA DATA REQUEST NO. 757:**Regarding Exh. KAE-05T 12:17-20, please provide all data and statistics upon which you relied to conclude “the fact that significantly higher pilotage rates in a number of West Coast port clusters than those proposed by PSP are not driving vessel traffic away from those ports.”

**RESPONSE:**

This testimony was based on my knowledge of the relative consistency of vessel traffic calling at ports on the Columbia River and small West Coast ports such as Grays Harbor, which have relatively high pilotage rates compared to Puget Sound.

**PMSA DATA REQUEST NO. 758:** Further regarding Exh. KAE-05T 12:17-20, please provide all vessel traffic data for the ports served by pilots in the Puget Sound, British Columbia, Prince Rupert, San Francisco Bay, Columbia River and Bar, Los Angeles, and Grays Harbor, prior to the July 2022 and after July 2022.

**RESPONSE:**

Objection on two grounds. First, this request has no time parameters. Second, this data was not assembled as part of my work as an expert witness for PSP and is readily available from public sources to any interested party including PMSA.

**PMSA DATA REQUEST NO. 760:** Admit that the following chart of transpacific spot rates created by S&P Global and posted at [https://www.joc.com/article/precipitous-fall-ocean-spot-market-near-bottom-zim-cfo\\_20230313.html](https://www.joc.com/article/precipitous-fall-ocean-spot-market-near-bottom-zim-cfo_20230313.html) on March 13, 2023, is an accurate representation of the present market. If denied, please state the basis of the denial.

### North Asia-US West Coast container spot rates depressed

Platts container rate North Asia to US West Coast USD per FEU



Source: Platts, S&P Global

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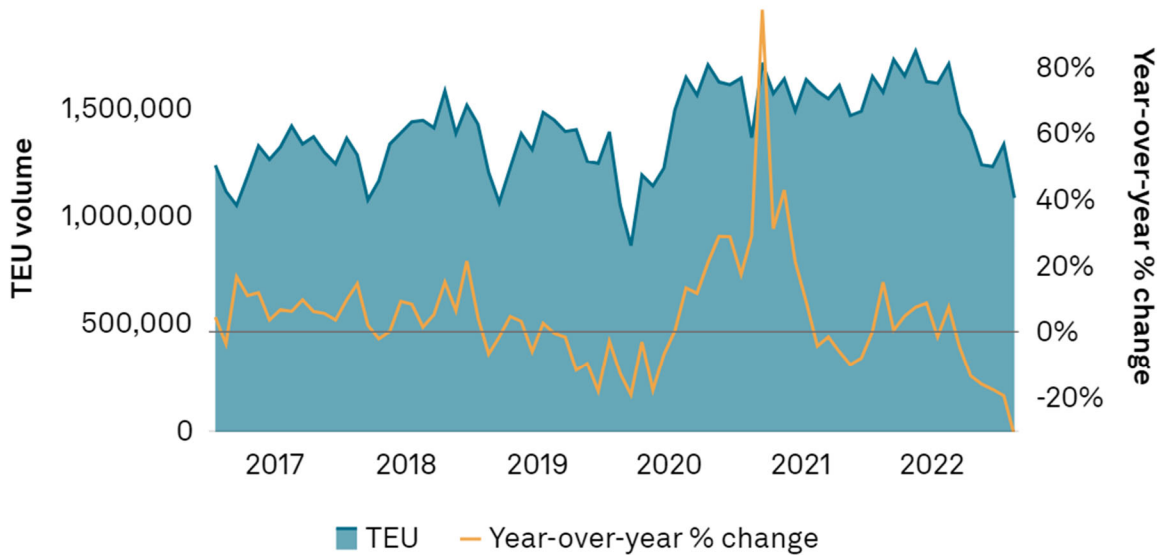
### RESPONSE:

Admit.

**PMSA DATA REQUEST NO. 761:** Admit that the following chart of Asia imports to the U.S. and posted at [https://www.joc.com/article/us-imports-begin-recovery-remain-well-below-2022-retailers\\_20230308.html](https://www.joc.com/article/us-imports-begin-recovery-remain-well-below-2022-retailers_20230308.html) on March 8, 2023, is an accurate representation of the present market. If denied, please state the basis of the denial.

### Asia imports to US remain near three-year low

Total monthly US imports from Asia with year-over-year change



Source: PIERS, S&P Global

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### RESPONSE:

Admit.