

PUGET SOUND PILOTS' RESPONSES TO UTC STAFF DATA REQUESTS 75-103

DATE PREPARED: August 4, 2020	WITNESS: Jeremy Nielsen
DOCKET: TP-190976	RESPONDER: Puget Sound Pilots
REQUESTER: UTC Staff	

**UTC STAFF DATA REQUEST NO. 89:**

**Re: Exhibit JJN-1T, Captain Jeremy Nielson**

- a. Are you authorized to provide pilotage service in the Puget Sound?
- b. Does your association have the same bookkeeper and accountant as PSP?
- c. Does your association have a large, off-books liability? If so, please provide any documents that describe the liability, as well as the association's treatment of that liability.

**PSP'S RESPONSE TO DATA REQUEST NO. 89:**

Objection. Capt. Nielsen is not a party, nor is he a witness within PSP's control. WAC 480-07-400(1)(a)(iii) defines Data Requests as "[a] party's written request that calls for another party to produce data in connection with an adjudicative proceeding is a data request." Thus, this is not a proper data request. PSP supplied the data request to Capt. Nielsen who provided responses.

Subject to and without waiving the foregoing objections, Capt. Nielsen responds as follows:

Response to Subpart (a): No.

Response to Subpart (b): No.

Response to Subpart (c): Pilots can accumulate up to 180 workdays of sick leave. The cost of sick leave used during the year is accounted for in our Special Purpose Financial Statement under pilot benefits.