

PUGET SOUND PILOTS' RESPONSES TO PMSA DATA REQUESTS Nos. 568-572

DATE PREPARED: January 10, 2023 DOCKET: TP-220513 REQUESTER: Pacific Merchant Shipping Association ("PMSA")	WITNESSES: JESSICA NORRIS and IVAN CARLSON RESPONDER: JESSICA NORRIS and IVAN CARLSON PUGET SOUND PILOTS DATE: January 23, 2023 TEL: 360-829-7028; (206) 518-5444 EMAIL: jnorris@shannon-cpas.com president@pspilots.org

PMSA DATA REQUEST NO. 568: Regarding your response to PMSA DR 176, thank you for providing the spreadsheet titled "PMSA Data Request 176 Attachment.xls" which includes a tabulation of "Individual Detail of Distributions to Pilots" with a breakdown per pilot per month in 2021. In order to provide this data without disclosure of information that PSP considers confidential or proprietary your response redacted all names that would identify the specific individual provided with specific cash disbursements. PMSA finds this responsive to our request.

Further to the spreadsheet provided in response to DR 176, please add identifying labels of your choosing next to each pilot distribution detail for each month so that this data can be analyzed. The purpose of these labels is to identify each individual pilot in a consistent but anonymous manner for purposes of analyzing this data while maintaining pilots' individual confidentiality. Please submit the spreadsheet with your identifying labels in response to this DR 568.

RESPONSE:

A tabulation of "Individual Detail of Distributions to Pilots" with anonymous identifying labels for each pilot and will be provided by January 27, 2023.

DATE PREPARED: January 10, 2023 DOCKET: TP-220513 REQUESTER: Pacific Merchant Shipping Association (“PMSA”)	WITNESS: CAPT. IVAN CARLSON RESPONDER: CAPT. IVAN CARLSON PUGET SOUND PILOTS DATE: January 23, 2023 TEL: 360-421-0583 EMAIL: president@pspilots.org
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PMSA DATA REQUEST NO. 569: Regarding your testimony on PSP efforts to implement directives in response to the UTC 2020 Order, admit that your testimony regarding “efficiency measures,” at Exh. IC-01T 11:13–15:17, omitted mention of the use of Coe & Company to assist PSP in the implementation of the UTC 2020 Order.

RESPONSE:

Admit.

PMSA DATA REQUEST NO. 570: Please describe and provide documentation of the computer programming modifications made by Coe & Company in 2021 to PSP's pilot dispatch software which would allow PSP to monitor the effects of changes to PSP's dispatch rules for the purpose of assessing the impact of rule changes on the efficiency of PSP's pilotage system.

RESPONSE:

In 2021, Coe & Company worked with another retained PSP contractor RedCloud Consulting, a business management and technology consulting firm, to monitor and track workload management and efficiency measures implemented by PSP pursuant to 2020 Rate Order. RedCloud's analysis necessitated extensive integration with PSP's Coe Systems dispatch program. The computer programming modifications represented significant work that raised cost concerns for PSP and necessitated temporary suspension of the project.

PMSA DATA REQUEST NO. 571: Regarding your testimony on PSP efforts to implement directives in response to the UTC 2020 Order, admit that your testimony regarding “callbacks,” at Exh. IC-01T 15:18–20:9, omitted mention of the use of Tabler Consulting to assist PSP in the implementation of the UTC 2020 Order.

RESPONSE:

Admit.

PMSA DATA REQUEST NO. 572: Please describe and provide documentation, including any memoranda provided to PSP and/or to members of PSP, of the consulting services provided by Tabler Consulting in 2021 regarding the implementation of the UTC 2020 Order with respect to the usage of callbacks and “comp days.”

RESPONSE:

Documents prepared by Walt Tabler of Tabler Consulting in 2021 regarding implementation of the UTC 2020 Order were prepared by Mr. Tabler in his capacity as former General Counsel and Executive Director of PSP during a period when PSP’s Executive Director position was not filled. PSP objects to providing these documents on the grounds that they are proprietary and confidential to PSP and protected by the self-critical analysis privilege.