

PUGET SOUND PILOTS' RESPONSE TO PMSA DATA REQUEST 416-438

DATE PREPARED: August 3, 2020 DOCKET: TP-190976 REQUESTER: PMSA	WITNESS: Dr. Sami Khawaja RESPONDER: Puget Sound Pilots
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TESTIMONY OF DR. SAMI KHAWAJA

DATA REQUEST NO. 432: With respect to your testimony regarding callback compensation that “there is no premium component to the compensation” and revenues “should provide additional compensation for Callbacks” (Exh. SK-3T at 3:3-6) and that “[c]allbacks should be above and beyond base compensation” (Exh. SK-3T 10:18-19), admit that as you understand it, pilots are currently compensated for callbacks under current rates but are compensated without a premium in the tariff and without additional compensation beyond base compensation in the tariff.

RESPONSE TO NO. 432:

Objection. This request mischaracterizes the testimony; PSP did not propose a premium component to the tariff, only additional compensation for additional work. Additionally, there is no stated rationale behind the current rates; the BPC established tariff rates in a “black box.”

Subject to and without waiving the foregoing objection, Dr. Khawaja responds as follows:

Denied. Based upon the methodology I have recommended, the revenue requirement would consider Callbacks and fund the additional work they represent. There is no evidence that the “black box” of tariff ratesetting relied upon by the Board of Pilotage Commissioners funded Callbacks in the revenue requirement at the time they are worked.

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DATA REQUEST NO. 436: Please provide documentation supporting your assertion that under the UTC Staff recommendation that pilots would “have earned Staff’s \$400k compensation, but they had to work numerous Callbacks for free to get it” (Exh. SK-3T at 11:17-18).

RESPONSE TO NO. 436:

The testimony was based upon the difference in the number of assignments a pilot would be required to work to earn \$400k under the assignment level proposed by Staff, which does not acknowledge that Callbacks represent additional labor above a pilot’s on-watch workload, and the FTE pilot’s workload that I calculated. For further elaboration, see page 11 of my rebuttal testimony.