

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: March 2, 2023
DOCKET: TP-220513
REQUESTER: PMSA

WITNESS: Mike Young
RESPONDER: Mike Young
TELEPHONE: (360) 664-1155

REQUEST NO. 1: Regarding the “Target DNI @ 56 pilots” testimony at Exhibit MY-09, please explain and detail the sources for inputs that are used for the line “Target DNI @ 56 pilots” under both “PSP Proposed Rates” and “Staff Proposed Rates.”

RESPONSE:

Staff started with the 52 pilots allowed in the prior case TP-190976, Order 09. Staff divided the number of ship assignments from that case, 6,900 by 52 to get an average assignment number. Staff then divided the projected number of assignments in this case, which is 7,400 by the average assignments and rounded down to 56.

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REQUEST NO. 3: Regarding the “DNI Calculation” testimony at Exhibit MY-09, please admit both of the following:

- a. That the UTC Staff proposed Total DNI is based on a proposed TDNI which is the product of DNI and a number of pilots, in addition to the proposed adjustment for medical premiums; and,
- b. That the Total DNI is based on the value of the product of a DNI of \$410,075 per pilot and the number of pilots at 56, in order to reach the amount of \$22,964,200.

RESPONSE:

Admit, with regard to both 3.a and 3.b. Staff used the DNI from the previous case, year 2 of \$410,075 and multiplied by 56 pilot FTEs (refer to response to Request No. 1) plus an adjustment for medical premiums.

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REQUEST NO. 5: Further with respect to Exhibit MY-09, please provide the Staff rationale for using DNI of \$410,075 per pilot in its TDNI calculation.

RESPONSE:

Staff used the DNI of \$410,075 as determined by the Commission in the previous case, Order 09, because that is the DNI amount embedded in the current tariff rates. Staff did not propose any increase to that DNI amount, with the exception of adding pilots' medical premiums (Staff adjustment PF-8) to reach a new total.

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REQUEST NO. 6: With respect to Exhibit JNS-02, in the Restating Adjustments to Expenses identified by PSP, please admit that UTC Staff proposes to agree with PSP to reduce the expense of “Commission – Senate Bill 5096” by \$150,000 when compared to the 2021 test year.

RESPONSE:

Yes. Staff agrees with PSP that “Commission-Senate bill 5096” should be removed from expenses.