



May 5, 2026

Sheri Tonn
Chair, Washington State Board of Pilotage Commissioners
2901 Third Ave. Ste 500
Seattle, WA 98121

Re: Email from Mike Moore dated April 22, 2026

Dear Chair Tonn:

This letter responds to the subject email sent directly to all Board of Pilotage Commissioners (BPC) members. The email was sent outside of the process established by vote of the Commission as outlined in the attached instructions emailed to both PSP and PMSA by Executive Director Jaimie Bever on February 24, 2026. The process required all written correspondence to be sent to Bettina Maki. The email from Captain Moore was inappropriate and misleading, and we encourage the BPC to address this deliberate disregard for the process.

The email by Captain Moore misrepresents assignment numbers as presented by Puget Sound Pilots (PSP) in the Washington Utilities and Transportation Commission (UTC) rate case with those used in the BPC WAC 363-116-065 (065) process. While both methodologies are documented, the email appears to be intended to cast doubt on the credibility of PSP's traffic projections. This letter explains each process and the reasons the resulting assignment numbers differ.

Under the BPC 065 process, assignment levels are used to determine the appropriate number of pilots needed to safely and efficiently meet demand over time. The Commission-approved methodology uses the trailing 24 months of assignments as of February 28, 2026, as a baseline. This time horizon reflects the operational reality that recruiting and training pilots requires significant lead time. We then adjusted this baseline to account for known and measurable changes in the coming year.

The UTC process differs from the BPC process in how it uses a historical test year to construct a forward-looking rate year. The test year—here, January 1 through December 31, 2024—serves as the starting point, capturing actual costs and activity. Those figures are then adjusted for known and measurable changes to develop the rate year, which in this case spans July 2026 through June 2027. These adjustments include anticipated traffic levels over the 12-month period following the Commission's order. PSP developed its rate-year projections by applying current traffic projections and other known changes to the test-year baseline. In this way, the UTC process uses one year of historical data as a foundation to build a funding framework for a single rate year.

Because the BPC relies on a trailing 24-month average while UTC relies on a single test year, the starting points for each calculation are fundamentally different. PMSA should be aware that the assignment numbers produced by each process will not match.

These differences do not indicate inconsistency. Rather, they reflect the distinct roles of the two bodies. The BPC, as the safety and efficiency regulator, focuses on maintaining a properly staffed pilotage system over a longer horizon. The UTC, as the economic regulator, focuses on setting rates to fund operations over a defined period. Different objectives appropriately lead to different methodologies and outcomes.

In closing, I would like to reiterate PSP's concerns with stakeholders emailing Commissioners directly outside of the established process during an O65 hearing. Allowing such actions taints the BPC process and introduces false and misleading information which does not serve the purpose of these proceedings.

Sincerely,



Scott Brewen
Executive Director, Puget Sound Pilots

Encl: