BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAI'I

In the Matter of the Application of

YOUNG BROTHERS, LLC

Application for Approval of a General Rate Increase and Certain Tariff Changes

846235.1

Docket No. 2019-0117

SUPPLEMENTAL MEMORANDUM IN FURTHER SUPPORT OF YOUNG BROTHERS, LLC'S MOTION FOR LEAVE AND FOR EMERGENCY OR TEMPORARY RATE RELIEF, FILED JULY 7, 2020

ATTACHMENT A

ATTACHMENTS 1 - 3

<u>and</u>

CERITIFCATE OF SERVICE

JEFFREY T. ONO DAVID Y. NAKASHIMA JOHN E. DUBIEL Watanabe Ing LLP 999 Bishop Street, Suite 1250 Honolulu, Hawaii 96813

Attorneys for Applicant YOUNG BROTHERS, LLC

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OF THE STATE OF HAWAI'I

In the Matter of the Application of

YOUNG BROTHERS, LLC

Application for Approval of a General Rate Increase and Certain Tariff Changes Docket No. 2019-0117

SUPPLEMENTAL MEMORANDUM IN FURTHER SUPPORT OF YOUNG BROTHERS, LLC'S MOTION FOR LEAVE AND FOR EMERGENCY OR TEMPORARY RATE RELIEF, FILED ON JULY 7, 2020

YOUNG BROTHERS, LLC ("Young Brothers," "YB," or the "Company"), by and through its counsel, Watanabe Ing LLP, respectfully submits the following Supplemental Memorandum in Further Support of its Motion for Emergency or Temporary Relief, filed on July 7, 2020 (the "Motion"). By its Motion, YB is seeking an emergency or temporary rate increase of \$30,418,706,¹ which represents the amount forecasted for YB to "break even" for its intrastate operations. In its Motion, YB stated that it would provide an update including the Company's proposed rate design intended to implement the \$30,418,706 temporary rate increase it proposed. The purpose of the Company's rate design would be to reflect a gradual movement towards the implementation of costbased rates for each type of commodity transported, and where possible, recognize costs differences between the ports it serves. By this Supplemental Memorandum in

¹ The temporary rate relief requests an increase of \$30,418,706 in intrastate operating revenues, over the updated forecast of \$65,059,605 in intrastate operating revenues at present rates or 46.76% (i.e., \$30,418,706 ÷ \$65,059,605 = 46.76%) over revenues at present rates. Young Brothers notes that the Commission is precluded from considering a rate increase in excess of \$26,997,928. As a result of notices to the public, the total amount Young Brothers may receive is restricted to the total amount requested in its application. <u>See</u> Decision and Order No. 13762 filed in Docket No. 7764.

Further Support of Young Brothers, LLC's Motion for Leave and For Emergency or Temporary Rate Relief, Filed on July 7, 2020 ("Supplemental Memorandum"), the Company, toward that end, provides its proposed rate design.

YB notes that in Order No. 37211, filed on June 10, 2020, in Transmittal No. 20-0003 (Non-Docketed) ("Order No. 37211"), the Commission directed YB to "include in its rate design proposal, a robust analysis of alternatives to the current adjusted sailing schedule that would seek to address YB's cost concerns but also move towards restoration of the pre-COVID sailing schedule for the benefit of customers[. . .]"² Order No. 37211 also provides that "[t]he consideration of alternatives to the adjusted sailing schedule may be filed as a supplement or addendum to the rate design proposal, depending on the timing, which the Commission will address by subsequent order[.]"³

Consistent with the Order No. 37211, the proposed rate design provided herein as Attachment 1 is based upon increased revenues sufficient to, at least in the short-term, return to its full sailing schedule. In other words, the \$30,418,706 revenue increase was predicated on the Company's pre-COVID-19 sailing schedule. As such, adoption of the Company's proposed rate increase as described in its Motion, and further defined here, is the fastest way to return the Company to its full, pre-COVID-19, sailing schedule. That said, the Company is, per the Commission's direction, currently developing a robust set of sailing schedule alternatives intended to address inherent realities it currently faces, including COVID-19 impacts (e.g., the disparity in costs between serving certain ports, reductions in its overall demand for transporting cargo,

² <u>See</u> Order No. 37211 at 16-17.

³ Id at 15.

etc.). While the Company understands that the Commission is interested in seeing those sailing schedule alternatives as quickly as possible, the Company must note that each alternative has the potential to directly, and substantially, impact nearly every aspect of its operation. As such, numerous and important financial, operational, labor, and other factors must be considered. Because its analysis is not yet completed, the Company intends to provide more information on those alternatives in a supplemental filing as early as possible. In the meantime, the Company has focused its efforts, and this Supplemental Memorandum, on proposing a rate design that best meets the dual objectives of returning to a full-sailing schedule (i.e., pre-COVID-19 sailing schedule) and better aligning its underlying cargo transport rates with its underlying costs.

I. Rate Design Overview

As noted above, in the Motion, the Company requested a temporary rate increase of \$30,418,706, but recognized that the Commission is precluded from considering a rate increase in excess of \$26,997,928.⁴ If applied equally to all rates, an additional \$26,997,928 in revenues would result in a rate increase of approximately 46% across all commodities. However, as noted in its Motion and explained in detail in direct testimony in Docket No. 2019-0117,⁵ the Company's existing rates do not effectively reflect its underlying cost structure. As such, across-the-board increases further exacerbate existing rate imbalances and add to unsustainable cross-subsidies, both of which endanger the Company's short-term and long-term viability. For example, prices charged to transport containers currently subsidize the cost to transport all other

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^{4 &}lt;u>See</u> the Company's Motion For Leave And For Emergency Or Temporary Rate Relief submitted July 7, 2020, Docket No. 2019-0017, page 28.

⁵ See Docket No. 2019-0117, YB T-9, Sections II, IV.

commodities with substantial subsidies flowing to the transport of non-standardized cargo that must be consolidated by the Company into a standardized format before they can be shipped.⁶ Generally known as "Less than Container Load" ("LCL"), these nonstandardized products (i.e., mixed cargo and pallets) require substantial cargo-handling costs for the Company – costs that are not effectively and currently recovered in existing rates. As such, existing rates not only negatively impact the Company's overall financial performance, they also send incorrect messages or price signals to certain customers. Below cost rates for LCL cargo encourage more, not less, transport of this more costly LCL cargo in relation to the transport of the more efficient, cost effective containers. Likewise, the existing rate structure fails to adequately recognize notable cost differences incurred by the Company to transport cargo between the various island ports it currently serves throughout the State. For example, barge trips to the Hilo port cost the Company approximately double the amount of fuel, employee time, and asset utilization (e.g., barges and tugs) than do sailings to either the Kahului or Nawiliwili ports,⁷ yet existing rates for the transport of a majority of the Company's products do not differ between these ports.

Per the Commission's direction in Order No. 37211, the Company has undertaken a robust analysis of these cost differences and has positioned its rate design proposal to address as many of these issues as is practicable in the emergency situation. For example, Attachment 1, appended hereto, identifies the Company's proposed rate increases on a percentage basis, by port and by commodity, based upon

⁶ See Docket No. 2019-0117, YB T-9, pages 7-10.

⁷ <u>See</u> Docket No. 2019-0117, YB T-9, page 20. See also Attachment 1.

the costs the Company incurs for each such port and commodity. Further, the Company is also appending Confidential Attachments 2 and 3 in support of its proposed rate design.⁸ These analyses were performed at the Company's request by QSI Consulting, Inc. ("QSI") to assist in, among other things, better-aligning future rates with its underlying costs, and evaluating alternative sailing schedules. As noted above, the Company is using this type of robust data analyses to ensure that whatever schedule changes are considered, and ultimately adopted, they are based upon sound financial criteria in combination with the needs of the Company's customers and their respective communities.

With the information above in mind, this filing focuses primarily on the Company's proposed rate design and the Company's objective of moving toward sustainable financial performance via rate rebalancing. Toward that end, the Company's proposed rate design as reflected in Attachment 1 aims to focus rate increases, where possible and with customer impacts in mind, toward its LCL products (i.e., mixed cargo and pallets).

The Company's existing rates for shipping containers are compensable and provide positive contributions to recovery of the Company's overall costs. Indeed, existing container rates currently subsidize many of the Company's other products. Ideally, in this circumstance, container rates would not increase. However, due to the size of the necessary revenue increase at issue, maintaining existing container rates

⁸ Confidential Attachment 2 is a Memorandum provided by the Company's cost of service/rate design consultant, QSI, based upon financials and volume forecasts using audited data included in Docket No. 2019-0117. Confidential Attachment 3 is a similar analysis using updated forecasts which include pandemic-related effects as provided in the Company's Motion For Leave And For Emergency Or Temporary Rate Relief.

while raising all other rates closer to underlying costs would result in dramatic increases to non-container prices. Hence, the Company's rate design proposal takes a meaningful step toward cost of service-based rates that includes a 26.4% weighted average increase in container prices, with containers shipped to Hilo increased by 30% and all other ports by 25%. In an incremental effort toward cost-based rates, the Company is also proposing that mixed cargo and reefer pallet prices would double (i.e., a 100% increase) and non-reefer pallet prices would experience a 52.4% weighted average increase, with prices to Hilo and Kawaihae increased by 75% versus 40% in all other ports. Automobile shipments to Hilo and Kawaihae would increase by 75% versus 70% to all other ports. Finally, the Company is proposing that Roll On/Roll Off ("RoRo") cargo rates would increase by 75% to Hilo and Kawaihae and 50% to all other ports.

II. Price Elasticity

As noted in the Company's general rate case filing,⁹ price elasticity of demand is a factor that cannot be ignored when setting prices. Nearly any increase in price will suppress subsequent demand such that a \$1 increase in price will almost always result in less than \$1 in additional revenue.¹⁰ This is especially true when prices increase at the rate necessitated by current conditions. It is worth noting that the proposed rate design described above and detailed in Attachment 1 does not employ an explicit price elasticity offset. In other words, for the sake of expediency, the price increases

⁹ See Docket No. 2019-0117, YB T-15, Section IV.

¹⁰ For example, it is possible (even likely) that consumers currently purchasing the Company's LCL products, when faced with substantial price increases, will choose to use non-Company freight-forwarders to consolidate their LCL cargo so as to take advantage of container-based pricing. This "substitution effect" caused by higher LCL prices is likely to suppress demand for the Company's LCL products below the volumes used to project anticipated revenue increases. Similarly, demand suppression is likely to arise from consumers choosing another method of transport or supplier and/or simply choosing to ship fewer items.

proposed herein ignore likely price elasticity effects, thereby assuming that a \$1 increase in price will result in \$1 of additional revenue, even though the Company recognizes that will almost certainly not be the case. While the Company understands that ignoring this well-established economic tenet is likely to result in a revenue increase below (potentially well below) its requested amount of \$26,997,928, it also recognizes that preparing a defendable price-elasticity analysis taking into consideration pandemic-related demand volatility is nearly impossible, especially in the time available. For these reasons, and in recognition of its dire cash flow situation at this time, the Company has made a conscious decision to take this approach as part of its Motion. It is the Company's hope that the Commission will recognize and appreciate the significance of this tradeoff by approving the Company's Motion and proposed rate design reflected in Attachment 1, as quickly as practicable.

DATED: Honolulu, Hawaii, July 17, 2020.

<u>/s/ David Y. Nakashima</u> JEFFREY T. ONO DAVID Y. NAKASHIMA JOHN E. DUBIEL

Attorneys for Applicant YOUNG BROTHERS, LLC

location; (2) states clearly the basis for the claim of confidentiality; and (3) describes, with particularity, the cognizable harm to Young Pursuant to Protective Order No. 36477, Attachment A: (1) identifies, in reasonable detail, the information's source, character, and Brothers ("YB") from any misuse or unpermitted disclosure of the information.

Pages With	Identification of Item	Basis of	Cognizable Harm
Redactions		Confidentiality	
AII	Confidential Rate	Commercially	The confidential rate design memorandum was
	Design Memorandum	sensitive and	proprietarily and confidentially developed and
		proprietary analysis	analyzed by a third-party vendor for YB's internal
		from a third-party	decision-making purposes. Further, due to the
		vendor paid for by	scope and commercially sensitive nature of the
		YB and intended for	information contained in this exhibit, public
		YB's internal use	disclosure of this information would competitively
			disadvantage YB by allowing potential competitors,
			unregulated customers, and other stakeholders to
			access and use such confidential and proprietary
			analysis against YB in future negotiations.
AII	Confidential Rate	Commercially	The confidential rate design memorandum was
	Design Memorandum	sensitive and	proprietarily and confidentially developed and
		proprietary analysis	analyzed by a third-party vendor for YB's internal
		from a third-party	decision-making purposes. Further, due to the
		vendor paid for by	scope and commercially sensitive nature of the
		YB and intended for	information contained in this exhibit, public
		YB's internal use	disclosure of this information would competitively
			disadvantage YB by allowing potential competitors,
			unregulated customers, and other stakeholders to
			access and use such confidential and proprietary
			analysis against YB in future negotiations.

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46.03% - Overall Rate Increase Percentage

	TO	TOTAL - ALL ISLANDS			НГО			KAWAIHAE	
			Projected			Proiected			Projected
	Freight	Proposed %	Revenue	Freight	Proposed %	Revenue	Freight	Proposed %	Revenue
Commodities	Revenues	Increase	Increase	Revenues	Increase	Increase	Revenues	Increase	Increase
1 Automobiles	\$6,315,389	72.5%	\$4,577,958	\$2,348,377	75.0%	\$1,761,282	\$795,343	75.0%	\$596,507
2 Auto	\$6,315,389	72.5%	\$4,577,958	\$2,348,377	75.0%	\$1,761,282	\$795,343	75.0%	\$596,507
3 Container/Trailer	\$31,372,123	26.4%	\$8,282,803	\$8,795,442	30.0%	\$2,638,633	\$5,022,791	25.0%	\$1,255,698
4 Dry 20	\$8,080,009	26.2%	\$2,117,503	\$1,950,017	30.0%	\$585,005	\$1,556,947	25.0%	\$389,237
5 Dry 24	\$41,967	26.9%	\$11,293	\$16,027	30.0%	\$4,808	\$9,303	25.0%	\$2,326
6 Dry 40	\$10,537,575	26.4%	\$2,778,807	\$2,888,273	30.0%	\$866,482	\$2,074,227	25.0%	\$518,557
7 Dry 45	\$42,212	25.7%	\$10,851	\$ 5,955	30.0%	\$1,786	\$13,367	25.0%	\$3,342
8 Flatrack 20	\$33,513	25.6%	\$8,564	\$3,724	30.0%	\$1,117	\$943	25.0%	\$236
9 Flatrack 40	\$43,799	25.9%	\$11,324	\$7,491	30.0%	\$2,247	\$14,397	25.0%	\$3,599
10 G-Van	\$461,903	26.0%	\$120,073	\$91,945	30.0%	\$27,584	\$84,875	25.0%	\$21,219
11 Platform 20	\$1,863,942	25.9%	\$482,388	\$328,053	30.0%	\$98,416	\$312,893	25.0%	\$78,223
12 Platform 24	\$3,021	25.0%	\$755	¢\$	30.0%	\$0	\$2,344	25.0%	\$586
13 Platform 40	\$1,187,818	26.1%	\$309,889	\$258,691	30.0%	\$77,607	\$210,337	25.0%	\$52,584
14 Reefer 20	\$1,770,349	26.6%	\$471,775	\$583,760	30.0%	\$175,128	\$235,562	25.0%	\$58,891
15 Reefer 40	\$7,306,016	26.8%	\$1,959,579	\$2,661,506	30.0%	\$798,452	\$507,596	25.0%	\$126,899
16 LCL	\$16,190,235	69.2%	\$11,211,128	\$3,687,606	86.0%	\$3,170,691	\$2,402,748	83.1%	\$1,997,188
17 Dry Mixed	\$1,308,583	100.0%	\$1,308,583	\$224,271	100.0%	\$224,271	\$211,749	100.0%	\$211,749
18 Dry Pallet	\$10,450,952	52.4%	\$5,471,845	\$2,067,659	75.0%	\$1,550,744	\$1,622,240	75.0%	\$1,216,680
19 Reefer Mixed	\$96,919	100.0%	\$96,919	\$13,989	100.0%	\$13,989	\$10,427	100.0%	\$10,427
20 Reefer Pallet	\$4,333,781	100.0%	\$4,333,781	\$1,381,687	100.0%	\$1,381,687	\$558,333	100.0%	\$558,333
21 RoRo	\$4,743,252	61.4%	\$2,912,863	\$904 , 082	75.0%	\$678,062	\$828,629	75.0%	\$621,472
22 RoRo	\$4,743,252	61.4%	\$2,912,863	\$904,082	75.0%	\$678,062	\$828,629	75.0%	\$621,472
23 Grand Total	\$58,620,999		\$26,984,752	\$15,735,507		\$8,248,668	\$9,049,511		\$4,470,865
* Notable differences by Island/Port (highlighted in yellow)	ces by Island/Po	rt (highlighted ir	(wollow) ו	% of total increase	ase	30.57%			16.57%

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	01	TOTAL - ALLISLANDS						KAHULUI	
			Projected			Projected			Projected
	Freight	Proposed %	Revenue	Freight	Proposed %	Revenue	Freight	Proposed %	Revenue
Commodities	Revenues	Increase	Increase	Revenues	Increase	Increase	Revenues	Increase	Increase
1 Automobiles	\$6,315,389	72.5%	\$4,577,958	\$1,381,343	70.0%	\$966,940	\$1,474,667	70.0%	\$1,032,267
2 Auto	\$6,315,389	72.5%	\$4,577,958	\$1,381,343	70.0%	\$966,940	\$1,474,667	70.0%	\$1,032,267
3 Container/Trailer	\$31,372,123	26.4%	\$8,282,803	\$5,875,840	25.0%	\$1,468,960	\$10,176,368	25.0%	\$2,544,092
4 Dry 20	\$8,080,009	26.2%	\$2,117,503	\$1,447,923	25.0%	\$361,981	\$2,436,282	25.0%	\$609,071
5 Dry 24	\$41,967	26.9%	\$11,293	\$7,490	25.0%	\$1,873	\$8,919	25.0%	\$2,230
6 Dry 40	\$10,537,575	26.4%	\$2,778,807	\$1,847,031	25.0%	\$461,758	\$3,441,005	25.0%	\$860,251
7 Dry 45	\$42,212	25.7%	\$10,851	\$5,155	25.0%	\$1,289	\$17,736	25.0%	\$4,434
8 Flatrack 20	\$33,513	25.6%	\$8,564	\$2,451	25.0%	\$613	\$7,150	25.0%	\$1,788
9 Flatrack 40	\$43,799	25.9%	\$11,324	\$9,853	25.0%	\$2,463	\$8,640	25.0%	\$2,160
10 G-Van	\$461,903	26.0%	\$120,073	\$73,667	25.0%	\$18,417	\$185,035	25.0%	\$46,259
11 Platform 20	\$1,863,942	25.9%	\$482,388	\$424,595	25.0%	\$106,149	\$704,624	25.0%	\$176,156
12 Platform 24	\$3,021	25.0%	\$755	\$226	25.0%	\$56	\$451	25.0%	\$113
13 Platform 40	\$1,187,818	26.1%	\$309,889	\$205,158	25.0%	\$51,290	\$407,085	25.0%	\$101,771
14 Reefer 20	\$1,770,349	26.6%	\$471,775	\$427,112	25.0%	\$106,778	\$350,398	25.0%	\$87,599
15 Reefer 40	\$7,306,016	26.8%	\$1,959,579	\$1,425,180	25.0%	\$356,295	\$2,609,043	25.0%	\$652,261
16 LCL	\$16,190,235	69.2%	\$11,211,128	\$3,255,236	59.1%	\$1,924,535	\$4,773,108	58.6%	\$2,796,193
17 Dry Mixed	\$1,308,583	100.0%	\$1,308,583	\$301,396	100.0%	\$301,396	\$431,308	100.0%	\$431,308
18 Dry Pallet	\$10,450,952	52.4%	\$5,471,845	\$2,217,836	40.0%	\$887,134	\$3,294,857	40.0%	\$1,317,943
19 Reefer Mixed	\$96,919	100.0%	\$96,919	\$22,541	100.0%	\$22,541	\$20,800	100.0%	\$20,800
20 Reefer Pallet	\$4,333,781	100.0%	\$4,333,781	\$713,463	100.0%	\$713,463	\$1,026,141	100.0%	\$1,026,141
21 RoRo	\$4,743,252	61.4%	\$2,912,863	\$1,191,207	50.0%	\$595,603	\$1,387,096	50.0%	\$693,548
22 RoRo	\$4,743,252	61.4%	\$2,912,863	\$1,191,207	50.0%	\$595,603	\$1,387,096	50.0%	\$693,548
23 Grand Total	\$58,620,999		\$26,984,752	\$11,703,625		\$4,956,038	\$17,811,239		\$7,066,100
* Notable differences by Island/Port (highlighted in yellow)	ces by Island/Poi	rt (highlighted ii	n yellow)			18.37%			26.19%

Docket No. 2019-0117 Supplement to YB's July 7, 2020 Motion (July 17, 2020) Attachment 1 Page 2 of 7

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			Projected			Projected			Projectea
	Freight	Proposed %	Revenue	Freight	Proposed %	Revenue	Freight	Proposed %	Revenue
Commodities	Revenues	Increase	Increase	Revenues	Increase	Increase	Revenues	Increase	Increase
1 Automobiles	\$6,315,389	72.5%	\$4,577,958	\$113,045	70.0%	\$79,131	\$202,614	70.0%	\$141,830
2 Auto	\$6,315,389	72.5%	\$4,577,958	\$113,045	70.0%	\$79,131	\$202,614	70.0%	\$141,830
3 Container/Trailer	\$31,372,123	26.4%	\$8,282,803	\$267,035	25.0%	\$66,759	\$1,234,647	25.0%	\$308,662
4 Dry 20	\$8,080,009	26.2%	\$2,117,503	\$111,974	25.0%	\$27,993	\$576,866	25.0%	\$144,216
5 Dry 24	\$41,967	26.9%	\$11,293	\$228	25.0%	\$57	\$0	25.0%	\$0
6 Dry 40	\$10,537,575	26.4%	\$2,778,807	\$55,542	25.0%	\$13,885	\$231,497	25.0%	\$57,874
7 Dry 45	\$42,212	25.7%	\$10,851	\$0	25.0%	\$0	\$0	25.0%	\$0
8 Flatrack 20	\$33,513	25.6%	\$8,564	\$7,808	25.0%	\$1,952	\$11,438	25.0%	\$2,859
9 Flatrack 40	\$43,799	25.9%	\$11,324	\$890	25.0%	\$223	\$2,528	25.0%	\$632
10 G-Van	\$461,903	26.0%	\$120,073	\$6,611	25.0%	\$1,653	\$19,770	25.0%	\$4,942
11 Platform 20	\$1,863,942	25.9%	\$482,388	\$20,770	25.0%	\$5,192	\$73,007	25.0%	\$18,252
12 Platform 24	\$3,021	25.0%	\$755	\$0	25.0%	\$0	\$0	25.0%	\$O
13 Platform 40	\$1,187,818	26.1%	\$309,889	\$15,670	25.0%	\$3,917	\$90,876	25.0%	\$22,719
14 Reefer 20	\$1,770,349	26.6%	\$471,775	\$36,374	25.0%	\$9,094	\$137,142	25.0%	\$34,286
15 Reefer 40	\$7,306,016	26.8%	\$1,959,579	\$11,167	25.0%	\$2,792	\$91,524	25.0%	\$22,881
16 LCL	\$16,190,235	69.2%	\$11,211,128	\$671,911	66.4%	\$445,861	\$1,399,626	62.6%	\$876,660
17 Dry Mixed	\$1,308,583	100.0%	\$1,308,583	\$43,962	100.0%	\$43,962	\$95,896	100.0%	\$95,896
18 Dry Pallet	\$10,450,952	52.4%	\$5,471,845	\$376,750	40.0%	\$150,700	\$871,610	40.0%	\$348,644
19 Reefer Mixed	\$96,919	100.0%	\$96,919	\$10,105	100.0%	\$10,105	\$19,056	100.0%	\$19,056
20 Reefer Pallet	\$4,333,781	100.0%	\$4,333,781	\$241,093	100.0%	\$241,093	\$413,064	100.0%	\$413,064
21 RoRo	\$4,743,252	61.4%	\$2,912,863	\$111,884	75.0%	\$83,913	\$320,354	75.0%	\$240,265
22 RoRo	\$4,743,252	61.4%	\$2,912,863	\$111,884	75.0%	\$83,913	\$320,354	75.0%	\$240,265
23 Grand Total	\$58,620,999		\$26,984,752	\$1,163,875		\$675,664	\$3,157,241		\$1,567,417
* Notable differences by Island/Port (highlighted in yellow)	es by Island/Po	rt (highlighted ii	n yellow)			2.50%			5.81%

Docket No. 2019-0117 Supplement to YB's July 7, 2020 Motion (July 17, 2020) Attachment 1 Page 3 of 7

Comparison of Rate Increases to Costs by Commodity Type

Step Towards Cost of Service Based Rates

Overall For All Ports

			Difference to	Difference	Proposed	Proposed Increase		Compare to COS
Row Labels (ratemaking)	Freight Rev	Rev Requirement	COS (\$)	from COS (%)	Change (%)	(\$)	Proposed Revenue	w/increase
Automobiles	\$6,315,389	\$8,999,086	-\$2,683,697	-42.5%	72.5%	\$4,577,958	\$10,893,347	\$1,894,262
Auto	\$6,315,389	\$8,999,086	-\$2,683,697	-42.5%	72.5%	\$4,577,958	\$10,893,347	\$1,894,262
Container/Trailer/Platform	\$31,372,123	\$26,909,684	\$4,462,439	14.2%	26.4%	\$8,282,803	\$39,654,926	\$12,745,241
Dry 20	\$8,080,009	\$9,649,739	-\$1,569,730	-19.4%	26.2%	\$2,117,503	\$10,197,512	\$547,773
Dry 24	\$41,967	\$33,852	\$8,115	19.3%	26.9%	\$11,293	\$53,261	\$19,408
Dry 40	\$10,537,575	\$9,401,546	\$1,136,029	10.8%	26.4%	\$2,778,807	\$13,316,382	\$3,914,837
Dry 45	\$42,212	\$23,748	\$18,465	43.7%	25.7%	\$10,851	\$53,063	\$29,316
Flatrack 20	\$33,513	\$26,828	\$6,685	19.9%	25.6%	\$8,564	\$42,077	\$15,249
Flatrack 40	\$43,799	\$29,626	\$14,172	32.4%	25.9%	\$11,324	\$55,123	\$25,496
G-Van	\$461,903	\$421,288	\$40,615	8.8%	26.0%	\$120,073	\$581,976	\$160,688
Platform 20	\$1,863,942	\$2,257,887	-\$393,945	-21.1%	25.9%	\$482,388	\$2,346,330	\$88,443
Platform 24	\$3,021	\$2,428	\$593	19.6%	25.0%	\$755	\$3,776	\$1,348
Platform 40	\$1,187,818	\$510,922	\$676,896	57.0%	26.1%	\$309,889	\$1,497,707	\$986,785
Reefer 20	\$1,770,349	\$1,327,571	\$442,778	25.0%	26.6%	\$471,775	\$2,242,124	\$914,554
Reefer 40	\$7,306,016	\$3,224,250	\$4,081,765	55.9%	26.8%	\$1,959,579	\$9,265,595	\$6,041,344
Less than Container Load	\$16,190,235	\$45,767,307	-\$29,577,072	-182.7%	69.2%	\$11,211,128	\$27,401,363	-\$18,365,944
Dry Mixed	\$1,308,583	\$5,616,049	-\$4,307,466	-329.2%	100.0%	\$1,308,583	\$2,617,165	-\$2,998,884
Dry Pallet	\$10,450,952	\$26,464,799	-\$16,013,846	-153.2%	52.4%	\$5,471,845	\$15,922,798	-\$10,542,001
Reefer Mixed	\$96,919	\$880,095	-\$783,176	-808.1%	100.0%	\$96,919	\$193,838	-\$686,257
Reefer Pallet	\$4,333,781	\$12,806,364	-\$8,472,583	-195.5%	100.0%	\$4,333,781	\$8,667,562	-\$4,138,803
Roll On / Roll Off	\$4,743,252	\$7,400,128	-\$2,656,877	-56.0%	61.4%	\$2,912,863	\$7,656,115	\$255,987
RoRo	\$4,743,252	\$7,400,128	-\$2,656,877	-56.0%	61.4%	\$2,912,863	\$7,656,115	\$255,987
Grand Total	\$58,620,999	\$89,076,206	-\$30,455,207			\$26,984,752		-\$3,470,454.70

Hilo

			Difference to	Difference	Proposed	Proposed Increase		Compare to COS
Row Labels (ratemaking)	Freight Rev	Rev Requirement	COS (\$)	from COS (%)	Change (%)	(\$)	Proposed Revenue	w/increase
Automobiles	\$2,348,377	\$3,527,256	-\$1,178,879	-50.2%	75.0%	\$1,761,282	\$4,109,659	\$582,403
Auto	\$2,348,377	\$3,527,256	-\$1,178,879	-50.2%	75.0%	\$1,761,282	\$4,109,659	\$582,403
Container/Trailer/Platform	\$8,795,442	\$9,095,183	-\$299,741	-3.4%	30.0%	\$2,638,633	\$11,434,075	\$2,338,892
Dry 20	\$1,950,017	\$2,724,315	-\$774,298	-39.7%	30.0%	\$585,005	\$2,535,022	-\$189,293
Dry 24	\$16,027	\$15,249	\$778	4.9%	30.0%	\$4,808	\$20,835	\$5,586
Dry 40	\$2,888,273	\$3,439,106	-\$550,833	-19.1%	30.0%	\$866,482	\$3,754,755	\$315,649
Dry 45	\$5,955	\$7,653	-\$1,698	-28.5%	30.0%	\$1,786	\$7,741	\$88
Flatrack 20	\$3,724	\$2,533	\$1,191	32.0%	30.0%	\$1,117	\$4,841	\$2,308
Flatrack 40	\$7,491	\$6,321	\$1,170	15.6%	30.0%	\$2,247	\$9,738	\$3,417
G-Van	\$91,945	\$91,941	\$4	0.0%	30.0%	\$27,584	\$119,529	\$27,588
Platform 20	\$328,053	\$502,379	-\$174,326	-53.1%	30.0%	\$98,416	\$426,469	-\$75,910
Platform 24	\$0	\$0	\$0	0.0%	30.0%	\$0	\$0	\$0
Platform 40	\$258,691	\$149,427	\$109,265	42.2%	30.0%	\$77,607	\$336,299	\$186,872
Reefer 20	\$583,760	\$526,002	\$57,758	9.9%	30.0%	\$175,128	\$758,888	\$232,886
Reefer 40	\$2,661,506	\$1,630,256	\$1,031,249	38.7%	30.0%	\$798,452	\$3,459,957	\$1,829,701
Less than Container Load	\$3,687,606	\$11,519,719	-\$7,832,113	-212.4%	86.0%	\$3,170,691	\$6,858,297	-\$4,661,421
Dry Mixed	\$224,271	\$1,181,908	-\$957,637	-427.0%	100.0%	\$224,271	\$448,542	-\$733,366
Dry Pallet	\$2,067,659	\$5,699,867	-\$3,632,208	-175.7%	75.0%	\$1,550,744	\$3,618,403	-\$2,081,464
Reefer Mixed	\$13,989	\$170,561	-\$156,572	-1119.2%	100.0%	\$13,989	\$27,978	-\$142,583
Reefer Pallet	\$1,381,687	\$4,467,383	-\$3,085,696	-223.3%	100.0%	\$1,381,687	\$2,763,374	-\$1,704,009
Roll On / Roll Off	\$904,082	\$1,709,315	-\$805,233	-89.1%	75.0%	\$678,062	\$1,582,144	-\$127,171
RoRo	\$904,082	\$1,709,315	-\$805,233	-89.1%	75.0%	\$678,062	\$1,582,144	-\$127,171
Subtotal	\$15,735,507	\$25,851,473	-\$10,115,966	-64.3%	52.42%	\$8,248,668	\$23,984,175	-\$1,867,298

Comparison of Rate Increases to Costs by Commodity Type

Step Towards Cost of Service Based Rates

Kawaihae

			Difference to	Difference	Proposed	Proposed Increase		Compare to COS
Row Labels (ratemaking)	Freight Rev	Rev Requirement	COS (\$)	from COS (%)	Change (%)	(\$)	Proposed Revenue	w/increase
Automobiles	\$795,343	\$993,932	-\$198,589	-25.0%	75.0%	\$596,507	\$1,391,851	\$397,919
Auto	\$795,343	\$993,932	-\$198,589	-25.0%	75.0%	\$596,507	\$1,391,851	\$397,919
Container/Trailer/Platform	\$5,022,791	\$4,598,100	\$424,691	8.5%	25.0%	\$1,255,698	\$6,278,488	\$1,680,389
Dry 20	\$1,556,947	\$1,769,961	-\$213,013	-13.7%	25.0%	\$389,237	\$1,946,184	\$176,223
Dry 24	\$9,303	\$7,117	\$2,186	23.5%	25.0%	\$2,326	\$11,628	\$4,512
Dry 40	\$2,074,227	\$1,865,449	\$208,777	10.1%	25.0%	\$518,557	\$2,592,783	\$727,334
Dry 45	\$13,367	\$6,463	\$6,904	51.7%	25.0%	\$3,342	\$16,708	\$10,246
Flatrack 20	\$943	\$595	\$347	36.9%	25.0%	\$236	\$1,178	\$583
Flatrack 40	\$14,397	\$5,367	\$9,030	62.7%	25.0%	\$3,599	\$17,996	\$12,629
G-Van	\$84,875	\$62,778	\$22,097	26.0%	25.0%	\$21,219	\$106,094	\$43,316
Platform 20	\$312,893	\$399,022	-\$86,129	-27.5%	25.0%	\$78,223	\$391,117	-\$7,905
Platform 24	\$2,344	\$1,915	\$429	18.3%	25.0%	\$586	\$2,930	\$1,015
Platform 40	\$210,337	\$84,882	\$125,455	59.6%	25.0%	\$52,584	\$262,922	\$178,039
Reefer 20	\$235,562	\$186,391	\$49,172	20.9%	25.0%	\$58,891	\$294,453	\$108,063
Reefer 40	\$507,596	\$208,160	\$299,436	59.0%	25.0%	\$126,899	\$634,494	\$426,335
Less than Container Load	\$2,402,748	\$6,197,874	-\$3,795,126	-157.9%	83.1%	\$1,997,188	\$4,399,936	-\$1,797,938
Dry Mixed	\$211,749	\$858,622	-\$646,874	-305.5%	100.0%	\$211,749	\$423,497	-\$435,125
Dry Pallet	\$1,622,240	\$3,800,935	-\$2,178,695	-134.3%	75.0%	\$1,216,680	\$2,838,919	-\$962,015
Reefer Mixed	\$10,427	\$94,957	-\$84,530	-810.7%	100.0%	\$10,427	\$20,854	-\$74,103
Reefer Pallet	\$558,333	\$1,443,360	-\$885,027	-158.5%	100.0%	\$558,333	\$1,116,665	-\$326,695
Roll On / Roll Off	\$828,629	\$1,060,350	-\$231,721	-28.0%	75.0%	\$621,472	\$1,450,101	\$389,751
RoRo	\$828,629	\$1,060,350	-\$231,721	-28.0%	75.0%	\$621,472	\$1,450,101	\$389,751
Subtotal	\$9,049,511	\$12,850,255	-\$3,800,745	-42.0%	49.40%	\$4,470,865	\$13,520,375	\$670,120
Juniolai	<i>,,,</i> ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Ş12,030,233	-93,000,743	-42.070	45.4070	ş4,470,803	ޱ3,320,373	Ş070,120

Nawiliwili

			Difference to	Difference	Proposed	Proposed Increase		Compare to COS
Row Labels (ratemaking)	Freight Rev	Rev Requirement	COS (\$)	from COS (%)	Change (%)	(\$)	Proposed Revenue	w/increase
Automobiles	\$1,381,343	\$1,932,811	-\$551,469	-39.9%	70.0%	\$966,940	\$2,348,282	\$415,471
Auto	\$1,381,343	\$1,932,811	-\$551,469	-39.9%	70.0%	\$966,940	\$2,348,282	\$415,471
Container/Trailer/Platform	\$5,875,840	\$4,235,611	\$1,640,229	27.9%	25.0%	\$1,468,960	\$7,344,800	\$3,109,189
Dry 20	\$1,447,923	\$1,514,639	-\$66,716	-4.6%	25.0%	\$361,981	\$1,809,903	\$295,265
Dry 24	\$7,490	\$5,259	\$2,231	29.8%	25.0%	\$1,873	\$9,363	\$4,104
Dry 40	\$1,847,031	\$1,349,349	\$497,682	26.9%	25.0%	\$461,758	\$2,308,789	\$959,439
Dry 45	\$5,155	\$2,015	\$3,140	60.9%	25.0%	\$1,289	\$6,444	\$4,429
Flatrack 20	\$2,451	\$1,193	\$1,258	51.3%	25.0%	\$613	\$3,064	\$1,870
Flatrack 40	\$9,853	\$8,623	\$1,229	12.5%	25.0%	\$2,463	\$12,316	\$3,692
G-Van	\$73,667	\$56,026	\$17,641	23.9%	25.0%	\$18,417	\$92,084	\$36,058
Platform 20	\$424,595	\$478,154	-\$53 <i>,</i> 560	-12.6%	25.0%	\$106,149	\$530,744	\$52,589
Platform 24	\$226	\$173	\$53	23.5%	25.0%	\$56	\$282	\$110
Platform 40	\$205,158	\$73,608	\$131,550	64.1%	25.0%	\$51,290	\$256,448	\$182,840
Reefer 20	\$427,112	\$244,346	\$182,765	42.8%	25.0%	\$106,778	\$533,890	\$289,543
Reefer 40	\$1,425,180	\$502,225	\$922,954	64.8%	25.0%	\$356,295	\$1,781,475	\$1,279,249
Less than Container Load	\$3,255,236	\$8,810,282	-\$5,555,046	-170.6%	59.1%	\$1,924,535	\$5,179,771	-\$3,630,511
Dry Mixed	\$301,396	\$1,167,242	-\$865,845	-287.3%	100.0%	\$301,396	\$602,792	-\$564,449
Dry Pallet	\$2,217,836	\$5,477,408	-\$3,259,573	-147.0%	40.0%	\$887 <i>,</i> 134	\$3,104,970	-\$2,372,438
Reefer Mixed	\$22,541	\$176,273	-\$153,732	-682.0%	100.0%	\$22,541	\$45,082	-\$131,191
Reefer Pallet	\$713,463	\$1,989,359	-\$1,275,896	-178.8%	100.0%	\$713,463	\$1,426,926	-\$562,433
Roll On / Roll Off	\$1,191,207	\$1,744,535	-\$553,329	-46.5%	50.0%	\$595,603	\$1,786,810	\$42,275
RoRo	\$1,191,207	\$1,744,535	-\$553,329	-46.5%	50.0%	\$595,603	\$1,786,810	\$42,275
Subtotal	\$11,703,625	\$16,723,240	-\$5,019,615	-42.9%	42.35%	\$4,956,038	\$16,659,663	-\$63,577

Comparison of Rate Increases to Costs by Commodity Type

Step Towards Cost of Service Based Rates

Kahului

			Difference to	Difference	Proposed	Proposed Increase		Compare to COS
Row Labels (ratemaking)	Freight Rev	Rev Requirement	COS (\$)	from COS (%)	Change (%)	(\$)	Proposed Revenue	w/increase
Automobiles	\$1,474,667	\$1,870,298	-\$395,631	-26.8%	70.0%	\$1,032,267	\$2,506,934	\$636,636
Auto	\$1,474,667	\$1,870,298	-\$395,631	-26.8%	70.0%	\$1,032,267	\$2,506,934	\$636,636
Container/Trailer/Platform	\$10,176,368	\$6,730,149	\$3,446,219	33.9%	25.0%	\$2,544,092	\$12,720,460	\$5,990,311
Dry 20	\$2,436,282	\$2,320,848	\$115,434	4.7%	25.0%	\$609,071	\$3,045,353	\$724,504
Dry 24	\$8,919	\$5,877	\$3,042	34.1%	25.0%	\$2,230	\$11,149	\$5,272
Dry 40	\$3,441,005	\$2,360,805	\$1,080,201	31.4%	25.0%	\$860,251	\$4,301,257	\$1,940,452
Dry 45	\$17,736	\$7,617	\$10,119	57.1%	25.0%	\$4,434	\$22,169	\$14,553
Flatrack 20	\$7,150	\$3,194	\$3 <i>,</i> 956	55.3%	25.0%	\$1,788	\$8,938	\$5,743
Flatrack 40	\$8,640	\$4,370	\$4,269	49.4%	25.0%	\$2,160	\$10,799	\$6,429
G-Van	\$185,035	\$172,717	\$12,318	6.7%	25.0%	\$46,259	\$231,293	\$58,577
Platform 20	\$704,624	\$708,104	-\$3,480	-0.5%	25.0%	\$176,156	\$880,780	\$172,676
Platform 24	\$451	\$340	\$111	24.6%	25.0%	\$113	\$564	\$224
Platform 40	\$407,085	\$129,803	\$277,282	68.1%	25.0%	\$101,771	\$508,857	\$379,054
Reefer 20	\$350,398	\$209,323	\$141,075	40.3%	25.0%	\$87,599	\$437,997	\$228,674
Reefer 40	\$2,609,043	\$807,151	\$1,801,892	69.1%	25.0%	\$652,261	\$3,261,304	\$2,454,153
Less than Container Load	\$4,773,108	\$12,422,634	-\$7,649,527	-160.3%	58.6%	\$2,796,193	\$7,569,301	-\$4,853,333
Dry Mixed	\$431,308	\$1,629,737	-\$1,198,429	-277.9%	100.0%	\$431,308	\$862,617	-\$767,120
Dry Pallet	\$3,294,857	\$7,981,053	-\$4,686,195	-142.2%	40.0%	\$1,317,943	\$4,612,800	-\$3,368,252
Reefer Mixed	\$20,800	\$157,295	-\$136,495	-656.2%	100.0%	\$20,800	\$41,601	-\$115,694
Reefer Pallet	\$1,026,141	\$2,654,549	-\$1,628,408	-158.7%	100.0%	\$1,026,141	\$2,052,283	-\$602,266
Roll On / Roll Off	\$1,387,096	\$1,678,400	-\$291,304	-21.0%	50.0%	\$693,548	\$2,080,644	\$402,244
RoRo	\$1,387,096	\$1,678,400	-\$291,304	-21.0%	50.0%	\$693,548	\$2,080,644	\$402,244
Subtotal	\$17,811,239	\$22,701,482	-\$4,890,243	-27.5%	39.67%	\$7,066,100	\$24,877,340	\$2,175,858

Molokai

			Difference to	Difference	Proposed	Proposed Increase		Compare to COS
Row Labels (ratemaking)	Freight Rev	Rev Requirement	COS (\$)	from COS (%)	Change (%)	(\$)	Proposed Revenue	w/increase
Automobiles	\$113,045	\$260,010	-\$146,965	-130.0%	70.0%	\$79,131	\$192,176	-\$67,834
Auto	\$113,045	\$260,010	-\$146,965	-130.0%	70.0%	\$79,131	\$192,176	-\$67,834
Container/Trailer/Platform	\$267,035	\$530,620	-\$263,584	-98.7%	25.0%	\$66,759	\$333,794	-\$196,825
Dry 20	\$111,974	\$281,552	-\$169,578	-151.4%	25.0%	\$27,993	\$139,967	-\$141,585
Dry 24	\$228	\$350	-\$122	-53.3%	25.0%	\$57	\$285	-\$65
Dry 40	\$55,542	\$120,099	-\$64,557	-116.2%	25.0%	\$13,885	\$69,427	-\$50,672
Dry 45	\$0	\$0	\$0	0.0%	25.0%	\$0	\$0	\$0
Flatrack 20	\$7,808	\$8,977	-\$1,170	-15.0%	25.0%	\$1,952	\$9,760	\$782
Flatrack 40	\$890	\$1,213	-\$322	-36.2%	25.0%	\$223	\$1,113	-\$100
G-Van	\$6,611	\$12,553	-\$5,942	-89.9%	25.0%	\$1,653	\$8,264	-\$4,289
Platform 20	\$20,770	\$50,821	-\$30,051	-144.7%	25.0%	\$5,192	\$25,962	-\$24,859
Platform 24	\$0	\$0	\$0	0.0%	25.0%	\$0	\$0	\$0
Platform 40	\$15,670	\$12,083	\$3,587	22.9%	25.0%	\$3,917	\$19,587	\$7,505
Reefer 20	\$36,374	\$35,834	\$540	1.5%	25.0%	\$9,094	\$45,468	\$9,634
Reefer 40	\$11,167	\$7,137	\$4,030	36.1%	25.0%	\$2,792	\$13,959	\$6,822
Less than Container Load	\$671,911	\$2,419,726	-\$1,747,815	-260.1%	66.4%	\$445,861	\$1,117,771	-\$1,301,954
Dry Mixed	\$43,962	\$301,876	-\$257,913	-586.7%	100.0%	\$43,962	\$87,925	-\$213,951
Dry Pallet	\$376,750	\$1,139,419	-\$762,669	-202.4%	40.0%	\$150,700	\$527,451	-\$611,969
Reefer Mixed	\$10,105	\$102,366	-\$92,261	-913.0%	100.0%	\$10,105	\$20,210	-\$82,156
Reefer Pallet	\$241,093	\$876,064	-\$634,971	-263.4%	100.0%	\$241,093	\$482,186	-\$393,879
Roll On / Roll Off	\$111,884	\$417,470	-\$305,585	-273.1%	75.0%	\$83,913	\$195,798	-\$221,672
RoRo	\$111,884	\$417,470	-\$305,585	-273.1%	75.0%	\$83,913	\$195,798	-\$221,672
Subtotal	\$1,163,875	\$3,627,825	-\$2,463,949	-211.7%	58.05%	\$675 <i>,</i> 664	\$1,839,540	-\$1,788,285

Docket No. 2019-0117 Supplement to YB's July 7, 2020 Motion (July 17, 2020) Attachment 1 Page 7 of 7

Comparison of Rate Increases to Costs by Commodity Type

Step Towards Cost of Service Based Rates

Lanai

Lundi			Difference to	Difference	Proposed	Proposed Increase		Compare to COS
Row Labels (ratemaking)	Freight Rev	Rev Requirement	COS (\$)	from COS (%)	Change (%)	(\$)	Proposed Revenue	w/increase
Automobiles	\$202,614	\$414,778	-\$212,164	-104.7%	70.0%	\$141,830	\$344,444	-\$70,334
Auto	\$202,614	\$414,778	-\$212,164	-104.7%	70.0%	\$141,830	\$344,444	-\$70,334
Container/Trailer/Platform	\$1,234,647	\$1,720,022	-\$485,375	-39.3%	25.0%	\$308,662	\$1,543,309	-\$176,713
Dry 20	\$576,866	\$1,038,424	-\$461,558	-80.0%	25.0%	\$144,216	\$721,082	-\$317,342
Dry 24	\$0	\$0	\$0	0.0%	25.0%	\$0	\$0	\$0
Dry 40	\$231,497	\$266,737	-\$35,240	-15.2%	25.0%	\$57,874	\$289,371	\$22,634
Dry 45	\$0	\$0	\$0	0.0%	25.0%	\$0	\$0	\$0
Flatrack 20	\$11,438	\$10,335	\$1,103	9.6%	25.0%	\$2,859	\$14,297	\$3,962
Flatrack 40	\$2,528	\$3,732	-\$1,204	-47.6%	25.0%	\$632	\$3,160	-\$572
G-Van	\$19,770	\$25,273	-\$5,503	-27.8%	25.0%	\$4,942	\$24,712	-\$561
Platform 20	\$73,007	\$119,407	-\$46,399	-63.6%	25.0%	\$18,252	\$91,259	-\$28,148
Platform 24	\$0	\$0	\$0	0.0%	25.0%	\$0	\$0	\$0
Platform 40	\$90,876	\$61,119	\$29,756	32.7%	25.0%	\$22,719	\$113,595	\$52,475
Reefer 20	\$137,142	\$125,674	\$11,468	8.4%	25.0%	\$34,286	\$171,428	\$45,754
Reefer 40	\$91,524	\$69,321	\$22,203	24.3%	25.0%	\$22,881	\$114,405	\$45,084
Less than Container Load	\$1,399,626	\$4,397,072	-\$2,997,446	-214.2%	62.6%	\$876,660	\$2,276,286	-\$2,120,786
Dry Mixed	\$95,896	\$476,664	-\$380,768	-397.1%	100.0%	\$95,896	\$191,792	-\$284,872
Dry Pallet	\$871,610	\$2,366,117	-\$1,494,507	-171.5%	40.0%	\$348,644	\$1,220,254	-\$1,145,863
Reefer Mixed	\$19,056	\$178,643	-\$159,586	-837.4%	100.0%	\$19,056	\$38,113	-\$140,530
Reefer Pallet	\$413,064	\$1,375,649	-\$962,585	-233.0%	100.0%	\$413,064	\$826,127	-\$549,522
Roll On / Roll Off	\$320,354	\$790,059	-\$469,705	-146.6%	75.0%	\$240,265	\$560,619	-\$229,440
RoRo	\$320,354	\$790,059	-\$469,705	-146.6%	75.0%	\$240,265	\$560,619	-\$229,440
Subtotal	\$3,157,241	\$7,321,931	-\$4,164,690	-131.9%	49.65%	\$1,567,417	\$4,724,658	-\$2,597,273

[Supplement to YB's July 7, 2020 Motion (July 17, 2020) Attachment 2 (19 pages) is confidential in its entirety and has been deleted pursuant to Protective Order No. 36477.] [Supplement to YB's July 7, 2020 Motion (July 17, 2020) Attachment 3 (19 pages) is confidential in its entirety and has been deleted pursuant to Protective Order No. 36477.]

CERTIFICATE OF SERVICE

I (we) hereby certify that copies of the foregoing document were duly served on

the following parties by having said copies delivered as set forth below:

DEPARTMENT OF COMMERCE AND CONSUMER Via E-Mail AFFAIRS DIVISION OF CONSUMER ADVOCACY 335 Merchant Street, Room 326 Honolulu, Hawaii 96813 <u>consumeradvocate@dcca.hawaii.gov</u> dnishina@dcca.hawaii.gov

DATED: Honolulu, Hawaii, July 17, 2020.

/s/ David Y. Nakashima JEFFREY T. ONO DAVID Y. NAKASHIMA JOHN E. DUBIEL

Attorneys for Applicant YOUNG BROTHERS, LLC

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PUBLIC UTILITIES COMMISSION

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