

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets TG-220243 and TG-220215

BDI DATA REQUEST NO. 010:

Describe all Solid Waste management services that Jammie's has provided to PCA during the period of January 1, 2021 to the present.

Response:

Jammie's Environmental, Inc. ("Jammie's") objects to BDI Data Request No. 010 as vague and ambiguous as to the phrase "Solid Waste management services" and to the extent it assumes the legal conclusion that Jammie's provides solid waste collection services to PCA. Jammie's does not provide solid waste management services to PCA, as it understands that phrase to mean. Jammie's is willing to meet and confer with BDI if BDI would like to clarify or explain its intended meaning of "Solid Waste management services."

First Supplemental Response:

Following a meet and confer between the parties on July 22, 2022, Jammie's understands BDI's clarification of its meaning of "Solid Waste management services" to mean any disposal of solid waste for PCA. During the meet and confer, Jammie's objected to providing information or documents broader than the subject matter of this proceeding, which pertains only to Jammie's work involving OCC Rejects. Without waiving that objection and subject thereto, aside from the OCC Reject services in dispute in this case, Jammie's restates its answer above that it does not provide solid waste management services to PCA.

As far as describing Jammie's work involving OCC Rejects, please see Jammie's Answer filed on April 25, 2022, paragraphs 19–27. Please see the document produced with Jammie's Response to BDI Data Request No. 017 for a list of equipment Jammie's uses to collect and dispose of the OCC Rejects for PCA.

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BDI DATA REQUEST NO. 011:

For the period of January 1, 2021 to the present, produce a copy of all itemized invoices, bills, or other similar documents establishing or tending to establish the amounts Jammie's charged to PCA for Solid Waste management services.

Response:

Jammie's Environmental, Inc. ("Jammie's") objects to BDI Data Request No. 011 as vague and ambiguous as to the phrase "Solid Waste management services" and to the extent it assumes the legal conclusion that Jammie's provides solid waste collection services to PCA. Jammie's does not provide solid waste management services to PCA, as it understands that phrase to mean. Jammie's is willing to meet and confer with BDI if BDI would like to clarify or explain its intended meaning of "Solid Waste management services."

First Supplemental Response:

Following a meet and confer between the parties on July 22, 2022, Jammie's understands BDI's clarification of its meaning of "Solid Waste management services" to mean any disposal of solid waste for PCA. During the meet and confer, Jammie's objected to providing information or documents broader than the subject matter of this proceeding, which pertains only to Jammie's work involving OCC Rejects. Without waiving that objection and subject thereto, aside from the OCC Reject services in dispute in this case, Jammie's restates its answer above that it does not provide solid waste management services to PCA.

For documents "establishing or tending to establish the amounts Jammie's charged to PCA for" collecting and disposing OCC Rejects, see Jammie's Responses to BDI Data Request Nos. 001-003.