

DOCKET TG-072226

EXHIBIT A
TO
DECLARATION OF JONATHAN C. THOMPSON



Rob McKenna

ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

1400 S Evergreen Park Drive SW • PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

February 27, 2008

Sent Via Facsimile, E-mail and U S Mail

Donald L. Anderson
Eisenhower & Carlson, PLLC
1200 Wells Fargo Plaza
1201 Pacific Avenue
Tacoma, WA 98402


Re: *In the Matter of Determining the Proper Carrier Classification of Glacier Recycle, LLC; Hungry Buzzard Recovery, LLC; and T&T Recovery, Inc.*
Docket No. TG-072226
UTC Data Requests Nos. 1-18 to Glacier Recycle, Hungry Buzzard Recovery, and T&T Recovery

Dear Mr. Anderson:

To facilitate the Washington Utilities and Transportation Commission (UTC or Commission) Staff's examination in Docket No. TG-072226, please provide responses to each of the following requests on separate sheets of paper and repeat the data request at the top of the page on which the response begins. Also, indicate on both the hard copy and any electronic version provided, the date the data response was prepared, the individual who prepared the response and the telephone number of the preparer. Please note that these requests are directed to all three companies, and each company should provide a separate response to each data request.

Please provide an original and two (2) copies of the initial written responses to these data requests in accordance with WAC 480-07-405(7). Please direct all responses to these requests to Jonathan C. Thompson, Assistant Attorney General, P.O. Box 40128, 1400 S. Evergreen Park Drive SW, Olympia, Washington, 98504-0128. Any questions concerning these data requests should be directed to Vicki Elliot at (360) 664-1100.

Sincerely,



JONATHAN C. THOMPSON
Assistant Attorney General

JCT:tmw
Enclosures
cc: All Parties.



Docket No. TG-072226

UTC Data Requests Nos. 1 - 18 to Glacier Recycle, Hungry Buzzard Recovery, and

T&T Recovery

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UTC STAFF DATA REQUEST NO. 1:

Please provide copies of any and all data requests submitted to you by any party to this proceeding and your corresponding responses to those data requests.

UTC STAFF DATA REQUEST NO. 2:

Please supply a copy of every advertisement issued by the company, including website addresses (URLs) and copies of Web pages, Yellow Pages ads, newspaper advertisements, business cards, brochures or flyers, and any other materials that describe or advertise the company's services.

UTC STAFF DATA REQUEST NO. 3:

Please provide a list of customers from whom the company *collected* materials in 2007.

UTC STAFF DATA REQUEST NO. 4:

Please provide a list of customers from whom the company *accepted* materials at its sorting facility in 2007.

UTC STAFF DATA REQUEST NO. 5:

Please provide the number of trucks or other motor vehicle equipment used by the company, by type, and please indicate whether the equipment is owned, leased, or rented.

UTC STAFF DATA REQUEST NO. 6:

Please provide the number of dumpsters, roll-off boxes, or other types of containers used, by type, and please indicated whether the equipment is owned, leased, or rented.

UTC STAFF DATA REQUEST NO. 7:

Please describe the identification on the sides of trucks or other motor vehicle equipment.

UTC STAFF DATA REQUEST NO. 8:

Please describe the identification on the sides or ends of containers, including any description of the intended contents of the containers.

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UTC STAFF DATA REQUEST NO. 9:

Has the company registered with Department of Ecology as a transporter of recyclable materials? If so, please supply a copy of the registration filed with the Department of Ecology.

UTC STAFF DATA REQUEST NO. 10:

Has the company completed a "Recycling & Material Recovery Facility: Notification/Exemption" form and filed it with the Department of Ecology? If so, please supply a copy of the form filed with the Department of Ecology.

UTC STAFF DATA REQUEST NO. 11:

Has the company completed and filed the Annual Report-Recycling Facility with Department of Ecology for 2006 or 2007? If so, please supply a copy of the 2007 or, in the alternative, the 2006 Annual Report-Recycling Facility form filed with the Department of Ecology.

UTC STAFF DATA REQUEST NO. 12:

Has the company completed and filed an answer to the Department of Ecology's 2006 or 2007 Washington State Recycling Survey? If so, please supply a copy of the 2007 or, in the alternative, the 2006 answer to the Washington State Recycling Survey filed with the Department of Ecology.

UTC STAFF DATA REQUEST NO. 13:

Please provide a copy of any correspondence—written or electronic, and dated at any time in 2007—from the county, Department of Ecology, or any other government agency, regarding the company's MRF operations.

UTC STAFF DATA REQUEST NO. 14:

Please report on the type and volume of materials brought to the company's sorting facility, either by the company itself or by others, for 2007, as follows:

	Type of material	Tons Collected by the Company	Tons Delivered by Others
1.	Paper – newspaper, corrugated, mixed, etc.		
2.	Cans – aluminum and tin		
3.	Metals – ferrous and non-ferrous		
4.	Glass – bottles, jars, etc.		
5.	Plastics – of any type		
6.	Yard debris		
7.	Food waste		
8.	Wood waste		
9.	Construction and demolition debris		
10.	Land clearing debris		
11.	Asphalt		
12.	Concrete		
13.	Roofing debris – wood shingles		
14.	Roofing debris – composite shingles		
15.	Other waste – list type		

UTC STAFF DATA REQUEST NO. 15:

Please report on the type, volume, and disposition of materials taken from the company's sorting facility to the end-use destination for 2007, as follows:

	Type of material	Tons Sold	Tons Otherwise Disposed ¹	To Whom	Final Use of Material
1.	Paper – newspaper, corrugated, mixed, etc.				
2.	Cans – aluminum and tin				
3.	Metals – ferrous and non-ferrous				
4.	Glass – bottles, jars, etc.				
5.	Plastics – of any type				
6.	Yard debris				
7.	Food waste				
8.	Wood waste				
9.	Construction and demolition debris				
10.	Land clearing debris				
11.	Asphalt				
12.	Concrete				
13.	Roofing debris – wood shingles				

¹ This column is provided for materials taken from the sorting facility, but for which the company does not receive compensation (*i.e.*, materials that must be disposed of at a landfill at a cost to the company).

14.	Roofing debris – composite shingles				
15.	Other waste – list type				

UTC STAFF DATA REQUEST NO. 16:

What steps does the company take to ensure each customer has an on-site trash collection container for the collection of solid waste for hauling by the regulated solid waste company?

UTC STAFF DATA REQUEST NO. 17:

What steps does the company take to monitor material deposited in each of its recycling containers to ensure they contain only recyclable materials?

UTC STAFF DATA REQUEST NO. 18:

Does the company enter into contracts with its customers to collect materials? If so, please supply a copy of each type of contract.



JONATHAN C. THOMPSON
Assistant Attorney General



Rob McKenna

ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

1400 S Evergreen Park Drive SW • PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

March 14, 2008

Sent Via Facsimile, E-mail and U S Mail

Donald L. Anderson
Eisenhower & Carlson, PLLC
1200 Wells Fargo Plaza
1201 Pacific Avenue
Tacoma, WA 98402


Re: *In the Matter of Determining the Proper Carrier Classification of Glacier Recycle, LLC; Hungry Buzzard Recovery, LLC; and T&T Recovery, Inc.*
Docket No. TG-072226
UTC Data Requests Nos. 19-22 to Glacier Recycle, LLC

Dear Mr. Anderson:

To facilitate the Washington Utilities and Transportation Commission (UTC or Commission) Staff's examination in Docket No. TG-072226, please provide responses to each of the following requests on separate sheets of paper and repeat the data request at the top of the page on which the response begins. Also, indicate on both the hard copy and any electronic version provided, the date the data response was prepared, the individual who prepared the response and the telephone number of the preparer.

Please provide an original and two (2) copies of the initial written responses to these data requests in accordance with WAC 480-07-405(7). Please direct all responses to these requests to Jonathan C. Thompson, Assistant Attorney General, P.O. Box 40128, 1400 S. Evergreen Park Drive SW, Olympia, Washington, 98504-0128. Any questions concerning these data requests should be directed to Vicki Elliot at (360) 664-1100.

Sincerely,



JONATHAN C. THOMPSON
Assistant Attorney General

JCT:tmw
Enclosures
cc: Parties



UTC STAFF DATA REQUEST NO. 19:

Please explain the relationship between Glacier Recycle, LLC and Democon Container Services, LLC, if any. Please provide the approximate dates of any significant transactions between the companies (e.g., purchase of one company by the other, transfer of assets, name change, or transfer of ownership).

Please indicate whether Democon Container Services, LLC exists as a separate and distinct company from Glacier Recycle, LLC. If so, do Democon Container Services, LLC and Glacier Recycle, LLC share any joint operations or assets? If so, please describe.

UTC STAFF DATA REQUEST NO. 20:

If Democon Container Services, LLC exists as a separate company, does Glacier Recycling, LLC have any knowledge about whether Democon Container Services, LLC has hauled material to the Weyerhaeuser facility in Longview?

If so, is Democon Container Services, LLC still hauling material to the Weyerhaeuser facility in Longview? If Democon Container Services, LLC is not presently doing so, but has done so in the past, when did it stop?

UTC STAFF DATA REQUEST NO. 21:

What is the relationship, if any, between Democon Container Services, LLC and Democon L.L.C.?

UTC STAFF DATA REQUEST NO. 22:

Does Glacier Recycling, LLC have any knowledge about whether Democon, L.L.C. has hauled material to the Weyerhaeuser facility in Longview?

If so, is Democon, L.L.C. still hauling material to the Weyerhaeuser facility in Longview? If Democon, L.L.C. not presently doing so, but has done so in the past, when did it stop?



JONATHAN C. THOMPSON
Assistant Attorney General