

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."

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets TG-220243 and TG-220215

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."