

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

STERICYCLE OF WASHINGTON, INC.,

Complainant,

v.

WASTE MANAGEMENT OF
WASHINGTON, INC., d/b/a WM
HEALTHCARE SOLUTIONS OF
WASHINGTON,

Respondent.

DOCKET TG-121597

COMMISSION STAFF'S
RESPONSE TO STERICYCLE OF
WASHINGTON, INC.S
PROPOSED DISCOVERY PLAN

1 Pursuant to the Notice Setting Filing Deadlines of February 8, 2013, Commission
Staff (Staff) reviewed Stericycle's proposed discovery plan and submits the following
comments.

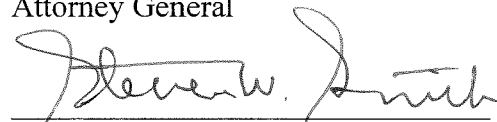
2 As a full party to this proceeding, staff requests that the final plan include Staff as a
recipient of copies of records produced by third party witnesses in depositions (Paragraph 7)
and as a participant in those depositions (Paragraph 9).

3 Paragraphs 11 and 13 Stericycle's proposal could negate the purpose of the
discovery plan. Consequently, Staff proposes that the phrase "and subject to the agreement
of the parties or by order of the Commission" be added at the end of each of those
paragraphs.

Dated this 5th day of March, 2013.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General



STEVEN W. SMITH
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff