

**EXH. JDS-12  
DOCKETS TG-220215/TG-220243  
WITNESS: JAMMIE D. SCOTT**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Application of  
JAMMIE'S ENVIRONMENTAL,  
INC.,**

**For Authority to Operate as a Solid  
Waste Collection Company in  
Washington**

**Docket TG-220243**

**BASIN DISPOSAL, INC.,**

**Complainant,**

**v.**

**JAMMIE'S ENVIRONMENTAL,  
INC.,**

**Respondent.**

**Docket TG-220215**

**ELEVENTH EXHIBIT (NONCONFIDENTIAL) TO THE  
PREFILED DIRECT TESTIMONY OF**

**JAMMIE D. SCOTT**

**ON BEHALF OF JAMMIE'S ENVIRONMENTAL, INC.**

**SEPTEMBER 16, 2022**

DATE PREPARED: July 21, 2022	WITNESS: Charlie Dietrich
DOCKET: TG-220215 and 220243	RESPONDER: Basin Disposal, Inc. and
REQUESTER: Jammie's Environmental, Inc.	Charlie Dietrich

**DATA REQUEST NO. 003:**

Identify each and every customer BDI has hauled or is currently hauling OCC Rejects for other than PCA. For any customers identified, describe in detail the services provided, and provide all documents relating to that service.

**RESPONSE:**

Objection. This request seeks information that is irrelevant in the discovery sense to the issues raised in Basin Disposal's formal complaint against Jammie's, which proceeding involves only the question of whether Jammie's is authorized to provide solid waste collection service to PCA to transport OCC Rejects for disposal.

The Commission has not specifically authorized discovery in Docket TG-220243, Jammie's Application for Solid Waste Authority. *See* WAC 480-07-400(2). Thus, this data request is inappropriate and the exceeds the scope of permissible discovery. To the extent such discovery, were authorized this request exceeds the scope of information relevant to an application proceeding. Specifically, Jammie's has not applied for authority to provide solid waste collection service beyond the facility operated by PCA near Wallula, WA. Thus, the information sought by this request cannot establish any fact in controversy. Additionally, the fitness of the protestant is not an issue in application proceedings. *See In Re: Application E-18894 of Carl Oscar Lundell, d/b/a Lundell Trucking, for Extension of Auth. Under Common Carrier Permit No. 36044.*, Order M.V. No. 129479 (Apr. 6, 1984). Moreover, this request also exceeds the reasonable test period typically relied upon by the Commission. *See In re Application of Sharyn Pearson*, Order M.V.C. No. 2041 (Mar. 9, 1994).

**SUPPLEMENTAL RESPONSE OF 08/23/22:**

Subject to and without waiving the foregoing objections regarding the scope of the request, Basin Disposal responds as follows:

There are no other paper mills generating OCC Rejects within Basin's Disposal's certificate territory, and thus there are no records or information responsive to this request.

Basin Disposal reserves the right to supplement or amend its response if additional responsive records are identified.