

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

MURREY’S DISPOSAL COMPANY,

Respondent

DOCKET TG-230778

COMMISSION STAFF’S MOTION
FOR LEAVE TO AMEND STAFF’S
MOTION FOR SPECIAL
PROTECTIVE ORDER

I. INTRODUCTION

1 On March 12, 2024, Staff filed in this proceeding a Motion for a Special Protective Order¹ regarding Murrey’s Disposal Company’s (Murrey’s) Data Requests 1, 2, 3, 4, 7(a), 7(b), and 8 to Staff. Murrey’s has not yet responded to this motion. Staff, pursuant to WAC 480-07-395(5), hereby requests leave to amend its original Motion for Protective Order in order to promote fair and just adjudication of the issues currently before the Commission.

II. RELIEF REQUESTED

2 Staff respectfully requests that the Commission issue an order granting Staff leave to amend the Motion for a Special Protective Order currently before the Commission. Staff has filed the Amended Motion for a Special Protective Order concurrently with this motion.

III. REQUEST FOR LEAVE TO AMEND

3 Under WAC 480-07-395(5), “[t]he commission may allow amendments to pleadings, motions, or other documents on such terms as promote fair and just results.” Such conditions are

¹ WAC 480-07-420(3).

present in this instant situation. Staff wishes to amend its motion to raise additional, timely objections to the data requests served on it by Murrey's. As evidenced by the WAC, the Commission has a vital interest in ensuring that cases before it are fully, justly, and fairly adjudicated. Leave to amend this motion will ensure that all parties are able to present and litigate all necessary objections to the applicable data requests. This leave to amend is timely, as neither Murrey's nor the Commission have yet given input on the motion.

4 As noted, Murrey's has not yet responded to the original Motion for Protective order. Therefore, Murrey's will not be prejudiced by amendment to this motion. Lack of any prejudice or harm to the fair and just results of this proceeding is further evidenced by the nature of the amendments themselves. Staff plans to make no wholly new arguments or objections in this amendment, only extend existing arguments applied to some DRs within the original motion to others also listed in the original motion.

IV. CONCLUSION

5 Staff respectfully requests that the Commission grant it leave to amend its motion for a special protective order to facilitate a just and fair outcome of this case.

DATED this 14th day of March 2024.

Respectfully submitted,

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