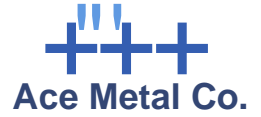


Ace Metal Company
11110 Mukilteo Speedway, Ste 202
Mukilteo, WA 98275
Office: 425-493-6802
Fax: 425-493-6809
info@acemetalco.com



September 7, 2022

Executive Director and Secretary Amanda Maxwell
Utilities and Transportation Commission
State of Washington

Dear Ms. Maxwell,

Attached is a petition of ACE METAL COMPANY for an exemption from
WAC480-14-250 (1) (a).

If you need further information, please feel free to contact us at 425-493-6802.

Regards,

Imee Yoo
Vice President
Ace Metal Company

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Records Management
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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

September 8, 2022

Re: PETITION FOR AN EXEMPTION FROM WAC 480-14-250(1) (a.)

Petitioner: ACE METAL COMPANY

Business Address: 11110 Mukilteo Speedway, Mukilteo, WA 98275

Representative Name and Title: Imee Yoo, Vice President

Representative Phone number: (425) 493-6802

BACK GROUND:

Petitioner, ACE METAL COMPANY (DBA ACE METALS), is licensed under the state of Washington as a scrap metal processor. It has a contract with the Washington Materials Management and Financing Authority (WMMFA) to haul electronics (such as TVs, computers and laptops) from the participating collectors within the state for processing or disassembling at its shop in Mukilteo, Washington.

Ace Metals has a **USDOT Number 2362103**. It has been in operations for over fifteen (15) years and is covered with Commercial Auto Liability Insurance policy for two trucks. One, is an Isuzu straight box truck with a scale weight of 9,869 lbs. and the other one is a step van with a scale weight of 17,460 lbs. It has passed the annual inspection report, in accordance with 49 CFR Part 396.

The company has only one driver. Ace Metals has never experienced a fatal accident over its fifteen years of operations. It does not have any record of collision or crashes.

It was recently covered by Progressive Insurance but after two months, it was cancelled since it does not meet with Company's guidelines. It also availed the services of its former insurer, United States Fire Insurance Company but it was not allowed to renew due to high hazard/severity of the property exposure inherent to the risks.

APPLICABLE LAW:

Under WAC 480-14-250 (1), each applicant for a common carrier authority must file with the Commission evidence of currently effective liability and property damage insurance written by a company authorized to write such insurance in the State of Washington.

The Petitioner, Ace Metals is requesting to get an insurance from surplus lines insurer that is not authorized to write insurance in the State of Washington. Surplus lines insurance, can provide coverage to companies like Ace Metals which has a high risk and does not meet the standard guidelines of insurers.

Ace Metals has identified as a surplus lines insurer, Prime Insurance Company thru its broker, Evolution Insurance Brokers. AM Best financial rating for Prime Insurance Company is currently "A" (excellent). The insurance broker, Rick J Lindsey, Evolution Insurance Brokers, is licensed by the WA State Office of the Insurance Commissioner to produce surplus lines insurance in WA.

The exemption for Ace Metals to avail on an insurer intrastate will allow the company to continue its operations while protecting the public against damage and injury. Hauling and trucking services is inherent in Ace Metals' e-scrap processor business.

With such exemption, Ace Metals will be suffering the following losses:

- 1) Financial loss due to additional cost of operations if it will avail of the services of outside contractors for hauling;
- 2) Non-performing assets. The company owned vehicles will no longer be operational.
- 3) Loss of contract to accept electronics processing from WMMFA due to non-availability of trucking/hauling services.
- 4) Permit or certificate of Common Carrier will be cancelled if we do not file a proof of insurance certificate (Form E) by Oct. 7, 2022.
- 5) Possible closure of business and lay off of ten employees.

Ace Metal Company

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PRAYER:

The Petitioner, ACE METAL COMPANY, requests an exemption from WAC 480-14-250 (1), allowing it to avail of an insurance from surplus lines insurer that is not authorized to write insurance in the State of Washington.

September 7, 2022.

Petitioner: ACE METAL COMPANY

Business Address: 11110 Mukilteo Speedway, Mukilteo, WA 98275

Representative Name and Title: Imee Yoo, Vice President

Signature of Representative:

Representative Phone number: (425) 493-6802