

DATE PREPARED: November 4, 2022 DOCKET: TG-220243-220215 REQUESTER: Basin Disposal, Inc.	WITNESS Kurt Thorne Brian Wilhelm Kasey Markland Responder: Packaging Corporation of America and Kasey Markland
--	---

DATA REQUEST NO. 15:

Regarding the prefiled testimony of Skyler Rachford in Exhibit No. 01T [sic] on page 29, stating “...we had to follow up several times to understand what the quote meant and what they would be charging,” produce all Communications by which PCA followed up for additional information or explanation from BDI.

RESPONSE:

No documents responsive to this request are believed to exist.

PCA recalls at least two follow up calls to Richard Dietrich after the meeting in September 2021 when BDI presented their proposal. The first call was shortly after the meeting. The first call was made to seek clarification on the pricing information related to the price difference listed for hauling costs and on-site services. In the second call, PCA was seeking clarification on what costs were actual costs versus theoretical costs. Even after these phone calls, PCA had to make several assumptions due to the theoretical nature of the estimates provided in the proposal.

PCA reserves the right to supplement or amend its response.