

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
Murrey's Disposal Co., Inc. d/b/a Olympic Disposal  
Responses to Staff Data Requests 1-6

DATE PREPARED:	February 23, 2024	WITNESS:	Kevin Joyce/Joe Wonderlick
DOCKET:	TG-230778	RESPONDER:	Joe Wonderlick
REQUESTER:	UTC Commission Staff		

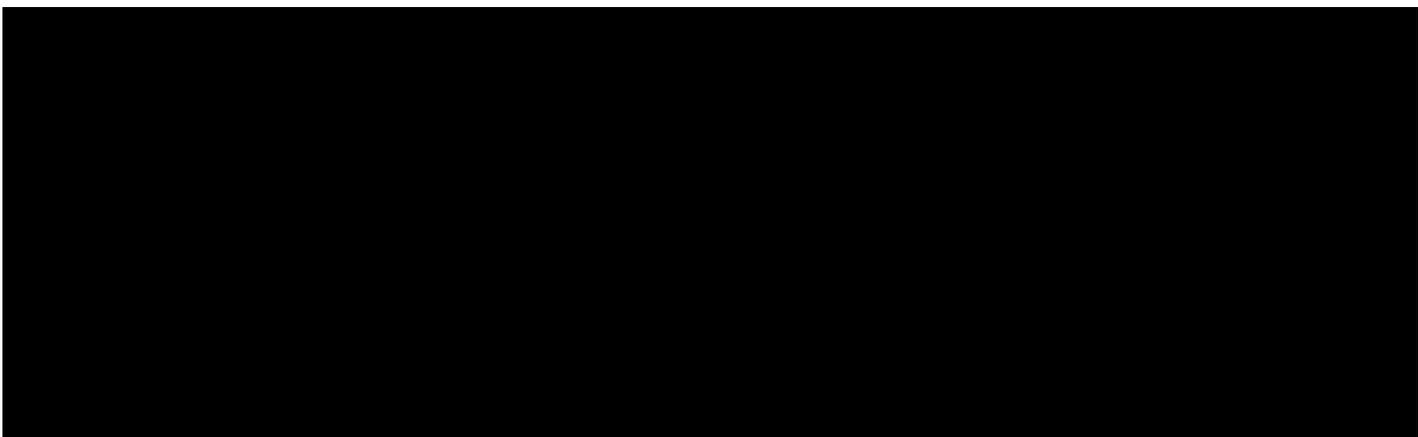
**UTC STAFF DATA REQUEST NO. 1:**

Please provide all documentation related to current insurance policies for vehicles utilized by the Company for regulated activity. Please make sure that the documentation includes the following information, as well as any and all other information available to the Company:

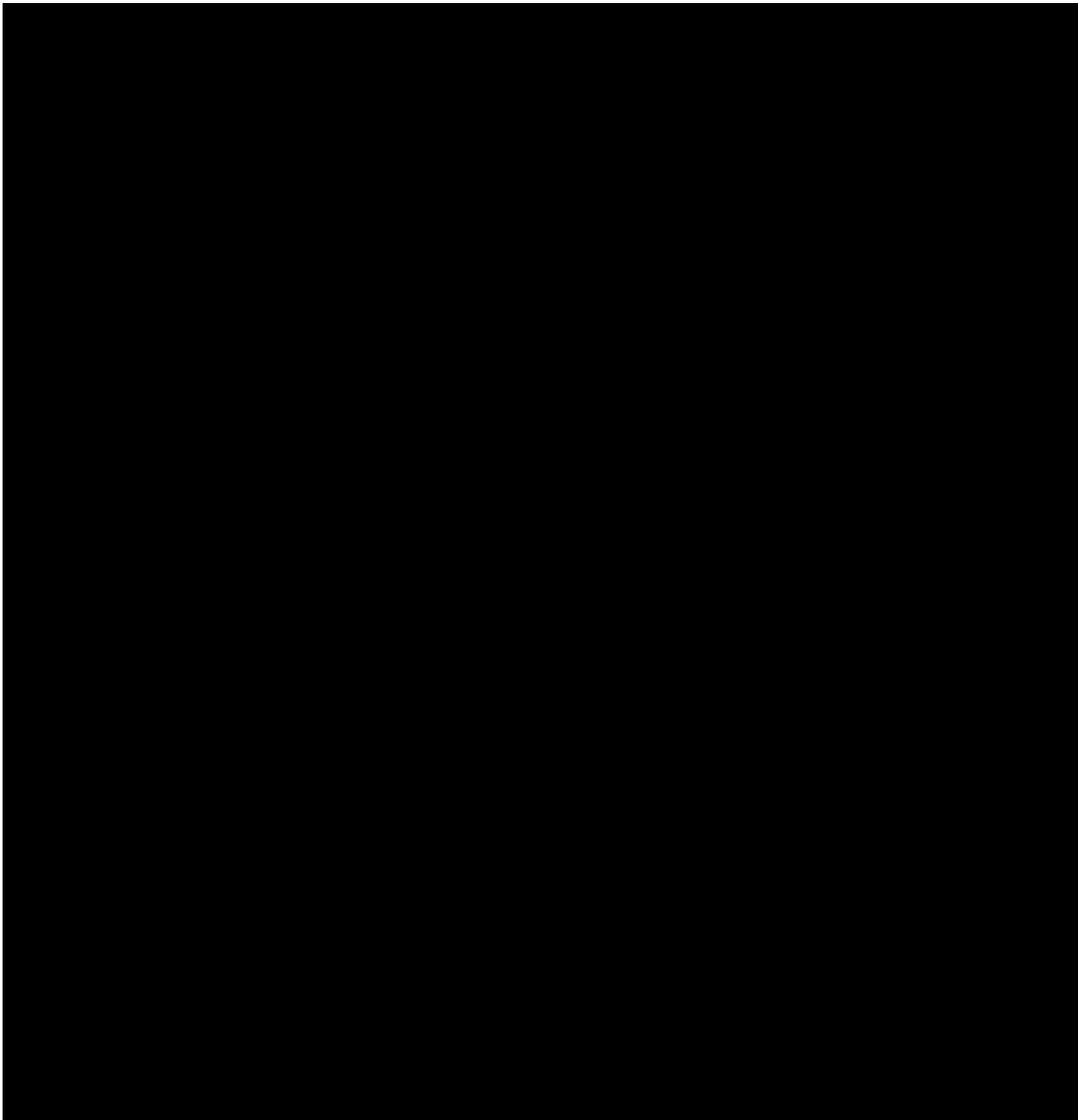
- a. Policy limits, deductibles, premiums, any accounting practices for the setting aside of premium amounts in holding accounts in anticipation of future claims, and the current balance of said accounts along with details of the type and interest rates of said accounts.
- b. Information on how claims are processed, what entity pays claims, the division of payment liability between different entities if multiple entities are responsible for payment of claim, and any certification or licensure for issuing insurance policies that is held by entities issuing these policies.

**RESPONSE TO DATA REQUEST NO. 1:**

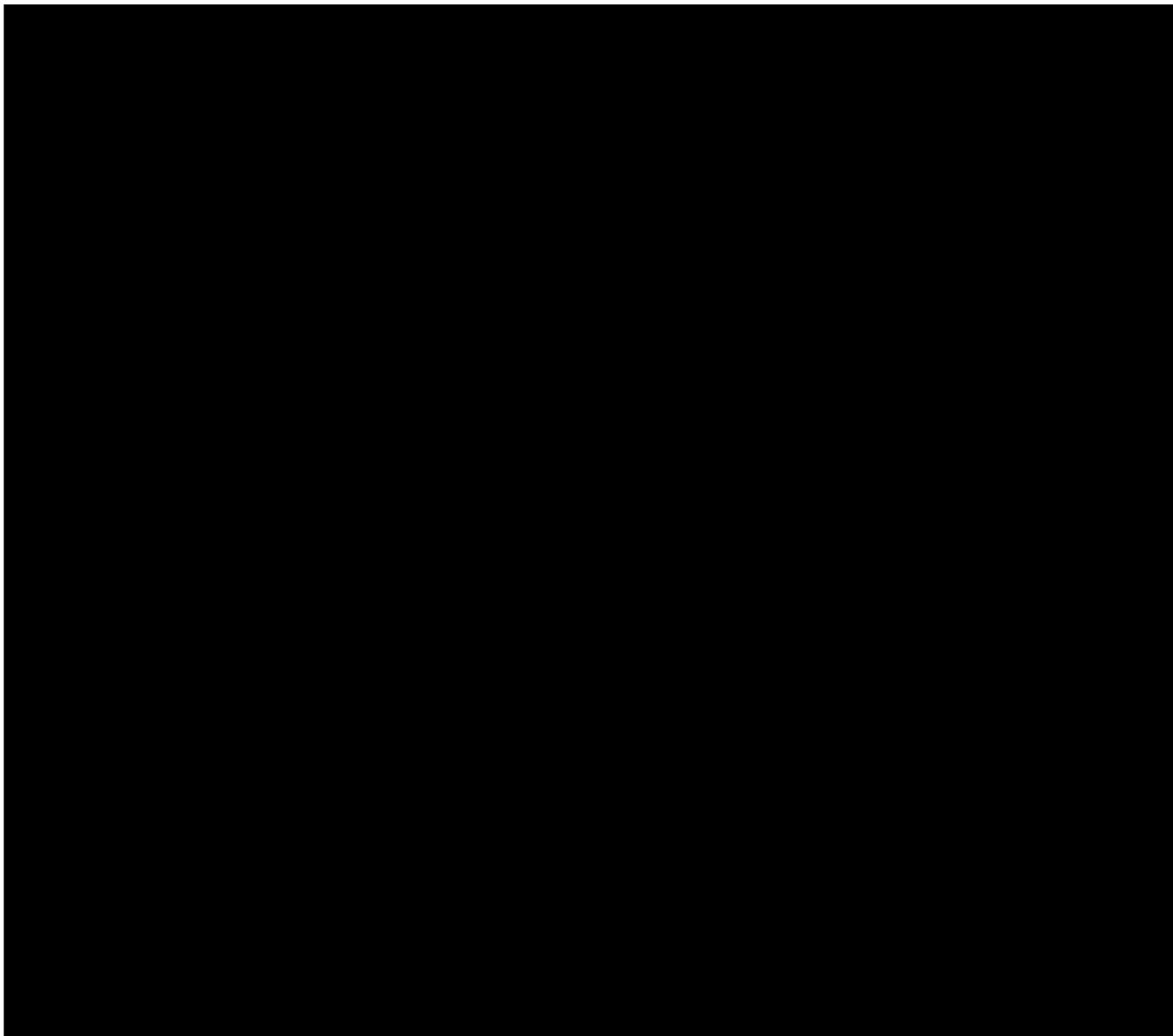
Murrey's Disposal Co., Inc. d/b/a Olympic Disposal ("The Company") objects to this data request as overly broad, unduly burdensome, and not reasonably calculated to lead to admissible evidence. The Company also objects to this data request to the extent it seeks to violate legal privileges and immunities, including but not limited to, attorney-client privilege, work-product privilege, and to the extent it seeks legal conclusions or opinions. The Company also objects to the fact Staff has not provided sufficient definitions to identify the information it seeks and as such the data requests are vague and ambiguous. Without waiving these objections, the Company answers as follows:



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