

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

**DATA REQUEST NO. 005:**

Produce all communications between BDI and the Commission relating to PCA, Jammie's, old corrugated cardboard, OCC Rejects, or otherwise relating to the claims or defenses in the consolidated dockets referenced above. To the extent there is no record relating to a communication (because the communication was verbal or otherwise), provide a detailed description of the communication including the date, participants, and content of the communication.

**RESPONSE:**

Objection. This request seeks information that is irrelevant in the discovery sense; it is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Basin is producing documents with bates numbers **BDI 00086 through BDI 00099**.

**SUPPLEMENTAL RESPONSE OF 07/28/2022:**

Basin restates its objects that communications with UTC staff are not relevant to any fact in controversy. The following narrative descriptions are provided subject to Basin's objections.

February 2, 2022. Basin's legal counsel, Blair Fassburg, spoke with UTC Staff, Kathryn McPherson by telephone to discuss Basin's informal complaint against Jammie's Environmental, Inc.

February, 23, 2022. Basin's legal counsel, Blair Fassburg, spoke via Microsoft Teams with UTC Staff, Kathryn McPherson and Matthew Perkinson, and the UTC's legal counsel, Jeff Roberson, to discuss Basin's informal complaint against Jammie's Environmental, Inc. and the respective legal interpretations of Commission exemptions from RCW 81.77.040.