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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In Re Application of
WASTE MANAGEMENT OF
WASHINGTON, INC.
d/b/a WM Healthcare Solutions
of Washington
720 4th Ave. Ste 400
Kirkland, WA 98033-8136

Docket No. TG-120033
NOTICE OF ERRATA RE PREFILED
REBUTTAL TESTIMONIES OF TAYA
BRILEY AND MIKE PHILPOTT

Counsel for Stericycle of Washington, Inc. has discovered an error on the numbering of the Prefiled Rebuttal Testimonies of Taya Briley and Mike Philpott.

Briley’s Prefiled Rebuttal Testimony was numbered as Stericycle Exhibit No. ____ (TB-1CT), it should read: “Stericycle Exhibit No. ____ (TB-1T).”

Philpott’s Prefiled Rebuttal Testimony was numbered as Stericycle’s Exhibit No. ____ (MP-27), it should read: “Stericycle’s Exhibit No. ____ (MP-17)”.

Please replace the title pages with the revised title pages attached hereto.

1 DATED this 26th day of November, 2012.

2
3 Respectfully submitted,

4 GARVEY SCHUBERT BARER

5
6 By 

7 Stephen B. Johnson, WSBA #6196

8 Jared Van Kirk, WSBA #37029

9 Attorneys for Protestant Stericycle of
10 Washington, Inc.

CERTIFICATE OF SERVICE

I, Dominique Barrientes, certify under penalty of perjury under the laws of the State of Washington that, on November 26, 2012, I caused to be served on the person(s) listed below in the manner shown a copy of NOTICE OF ERRATA RE PREFILED REBUTTAL TESTIMONIES OF TAYA BRILEY AND MIKE PHILPOTT:

Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. SW
PO Box 47250
Olympia, WA 98504-7250
(360) 664-1160
records@utc.wa.gov

- Via Legal Messenger
- Via Facsimile
- Via FedEx
- Via Email

Administrative Law Judge
Gregory Kopta
gkopta@utc.wa.gov

- Via Email

Jessica Goldman
Polly L. McNeill
Summit Law Group
315 – 5th Avenue South
Seattle, WA 98104
jessicag@summitlaw.com
pollym@summitlaw.com
kathym@summitlaw.com
deannas@summitlaw.com

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,
Postage Prepaid
- Via Email

James K. Sells
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PMB 22, 3110 Judson Street
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*Attorney for Protestant WRRRA,
Rubatino, Consolidated, Murrey's and
Pullman*

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,
Postage Prepaid
- Via Email

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Frona Woods
Office of the Attorney General
Utilities and Transportation Division
1400 S. Evergreen Park Drive SW
PO Box 40128
Olympia, WA 98504-0128
(360) 664-1225
(360) 586-5522 Fax
fwoods@utc.wa.gov
BDeMarco@utc.wa.gov

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,
Postage Prepaid
- Via Email

Dated at Seattle, Washington this 26th day of November, 2012.



Dominique Barrientes
dbarrientes@gsblaw.com

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In Re Application of
WASTE MANAGEMENT OF
WASHINGTON, INC.
d/b/a WM Healthcare Solutions
of Washington
720 4th Ave. Ste 400
Kirkland, WA 98033-8136

Docket No. TG-120033

PREFILED REBUTTAL TESTIMONY OF
TAYA BRILEY

1. I am over the age of 18 and am competent to testify to the matters addressed below.

2. I am the President of Washington Hospital Services (“WHS”), a wholly owned subsidiary of the Washington State Hospital Association (“WSHA”). WSHA is a non-profit trade association representing 97 hospitals located throughout Washington. WHS works to ensure that WSHA’s members have access to the services they need to support their operations and facilities at the best prices, including biomedical waste collection services. My testimony is based on my personal knowledge and on consultations with WSHA and WHS staff, present and former.

3. WHS was asked by WSHA and WSHA’s member hospitals to evaluate the services proposed by Stericycle of Washington, Inc. and its parent company, Stericycle, Inc. (collectively, “Stericycle”) when Stericycle entered the medical waste marketplace in

EXHIBIT B Stericycle Exhibit No. ____ (MP-17)

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In Re Application of

WASTE MANAGEMENT OF
WASHINGTON, INC.
d/b/a WM Healthcare Solutions
of Washington
720 4th Ave. Ste 400
Kirkland, WA 98033-8136

Docket No. TG-120033

**PROTESTANT STERICYCLE OF
WASHINGTON, INC.'S SECOND DATA
REQUESTS TO APPLICANT WASTE
MANAGEMENT OF WASHINGTON,
INC. AND SUPPLEMENTAL
RESPONSES THERETO**

Subject to the Commission's October 3, 2012 order and, otherwise subject to its previously stated objections, Waste Management of Washington, Inc. ("Waste Management") provides the following supplemental responses to Stericycle of Washington, Inc.'s ("Stericycle") Second Data Requests.

DATA REQUESTS

DATA REQUEST NO. 3:

Please Identify when and how frequently you have collected material in Washington for Your ecoFinity Sharps Recycling Services, how long the material collected was stored at Your Seattle processing facility, and when and how frequently such material was transported to California for processing.

Supplemental Response: Waste Management collects waste at St. Joseph's Medical Center for ecoFinity processing weekly.

DATA REQUEST NO. 4:

Please Describe the "pilot" program for Your ecoFinity Sharps Recycling Services that is being conducted or has been conducted at St. Joseph Medical Center. Please produce all records describing the services involved in that "pilot" program.

Supplemental Response: See Waste Management's responses to Stericycle's first Data Request Nos. 18(A), 18(E), and 18(G). See also WM000148-154, WM000174-75, WM000189-92, and www.bd.com/ecoFinity.

PROTESTANT STERICYCLE OF WASHINGTON,
INC.'S SECOND DATA REQUESTS TO APPLICANT
WASTE MANAGEMENT OF WASHINGTON, INC.
AND OBJECTIONS AND RESPONSES THERETO-1