

WUTC v. Waste Management of Washington, Inc.

Docket No. TG-240189 - Vol. I

June 21, 2024



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BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)
TRANSPORTATION COMMISSION,)
)
Complainant,)
)
vs.) DOCKET NO. TG-240189
)
WASTE MANAGEMENT OF)
WASHINGTON, INC.,)
)
Respondent.) PAGES 1-22
)

PREHEARING CONFERENCE - VOL I

June 21, 2024

BEFORE ADMINISTRATIVE LAW JUDGE MICHAEL HOWARD

Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98504

TRANSCRIBED BY: ELIZABETH PATTERSON HARVEY, WA CCR 2731

1 June 21, 2024 - 1:30 p.m.
2 -o0o-

3
4 JUDGE HOWARD: Let's be on the record. The
5 time is 1:30 p.m. My name is Michael Howard, and I'm an
6 administrative law judge for the Washington Utilities and
7 Transportation Commission.

8 We're here today for a prehearing conference
9 in Docket TG-240189, which is captioned Washington
10 Utilities and Transportation Commission versus Waste
11 Management Washington, Incorporated.

12 We are recording this prehearing conference
13 right now and transcribing it later. If you remain on
14 the call, then we're presuming you consent to being
15 recorded as part of that.

16 Let's start by taking appearances, beginning
17 with the company.

18 ATTORNEY STANOVSKY: Good afternoon, your
19 Honor. Walker Stanovsky with Davis Wright Tremaine,
20 representing Waste Management.

21 And with me virtually is Ame Lewis, inhouse
22 counsel for the company.

23 JUDGE HOWARD: Thank you.

24 And could we have an appearance for staff?

25 ATTORNEY GAFKEN: Yes, good afternoon, Judge

1 A P P E A R A N C E S
2 FOR THE COMPANY:

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14 FOR COMMISSION STAFF

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20 FOR PUBLIC COUNSEL:

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25 robert.sykes@atg.wa.gov

1 Howard. My name is Lisa Gafken. I'm an assistant
2 attorney general appearing on behalf of staff.

3 JUDGE HOWARD: Thank you.

4 And public counsel?

5 ATTORNEY SYKES: Good afternoon, your Honor.
6 My name is Rob Sykes. I'm an assistant attorney general
7 with the public counsel unit.

8 JUDGE HOWARD: All right. Thank you.

9 And we can certainly address this later. I'm
10 just noting, though, that if the company's inhouse
11 counsel would also like to be added to the main service
12 list, we can certainly do that. I'm not seeing Lewis on
13 it.

14 ATTORNEY STANOVSKY: Yes, please, your Honor.
15 She was included on the entry of appearance that was
16 submitted on my letterhead. But yes, we'd like her on
17 the service list, and a couple of staff folks as well.

18 We can address later or now as you prefer. Now?

19 JUDGE HOWARD: Are they noted on your notice
20 of appearance?

21 ATTORNEY STANOVSKY: I don't think so as
22 requested recipients. But they're not attorneys. So no.

23 But I think they may have been included on
24 some emails to this point.

25 In any case, my legal assistant, Nancy Foley,

Page 5

1 so that's N-A-N-C-Y-F-O-L-E-Y@dwt.com, and Sabrina
 2 Goodwin with Waste Management, who -- give me just moment
 3 to find her e-mail address. I apologize. I should have
 4 had that up. But two seconds.
 5 ATTORNEY LEWIS: I can jump in, Walker, if
 6 you --
 7 ATTORNEY STANOVSKY: Sure.
 8 ATTORNEY LEWIS: Yes. It's
 9 S-G-O-O-D-W-I-1@wm.com.
 10 JUDGE HOWARD: All right. Thank you.
 11 And feel free to e-mail me with any
 12 corrections or additions after our conference today.
 13 ATTORNEY STANOVSKY: Thank you.
 14 JUDGE HOWARD: All right. Now, do we have
 15 anyone on the call who wishes to intervene in this
 16 proceeding?
 17 All right. Hearing none, we'll -- I imagine
 18 most of our discussion today is going to be about the
 19 schedule for this proceeding. Have the parties had a
 20 chance to discuss the procedural schedule, or should I go
 21 offline and let the parties discuss? That's our
 22 customary practice here.
 23 ATTORNEY GAFKEN: We have had an opportunity
 24 to discuss the schedule, and we have an agreed schedule
 25 that we can present. So no need to go off the record.

Page 6

1 JUDGE HOWARD: That would be great. Please
 2 go ahead.
 3 ATTORNEY GAFKEN: Okay. So it starts with
 4 the prehearing conference, which is today.
 5 The next item is the settlement conference,
 6 which we've agreed to July 19, 2024.
 7 Staff testimony will be due on October 22,
 8 2024.
 9 Company and public counsel response will be
 10 due November 22, 2024. And at that point, discovery
 11 response deadlines will reduce to seven business days.
 12 Staff rebuttal and cross-answering testimony
 13 will be due on December 20, 2024. At that time,
 14 discovery responses will be due in five business days.
 15 It will ratchet down again.
 16 The discovery deadline will be January 27,
 17 2025.
 18 Cross estimates, exhibits, and I think errata
 19 is usually done. There's a number of things that usually
 20 happen on that date. That is February 10, 2025.
 21 Hearing would be February 18, 2025.
 22 And simultaneous briefs would be due on March
 23 18, 2025.
 24 JUDGE HOWARD: All right.
 25 ATTORNEY GAFKEN: And I can e-mail those

Page 7

1 dates out as well to make it easier.
 2 JUDGE HOWARD: That might be good just to
 3 confirm. I think I have all of them correctly, but if
 4 you could e-mail me and CC the other parties, I'd
 5 appreciate that.
 6 ATTORNEY GAFKEN: Absolutely.
 7 JUDGE HOWARD: Did any party have any
 8 clarifications or additions to that?
 9 All right. Hearing none, I would plan on
 10 including a requirement in the prehearing conference
 11 order essentially requiring all the data requests and
 12 responses to be shared with each other party to the
 13 proceeding. Is there any objection to my including that
 14 in this prehearing conference order?
 15 ATTORNEY GAFKEN: No objection from staff.
 16 We would support that.
 17 ATTORNEY SYKES: No objection from public
 18 counsel.
 19 ATTORNEY STANOVSKY: No objection from Waste
 20 Management.
 21 JUDGE HOWARD: All right. Great. Thank you.
 22 Seeing if there's anything else we should
 23 discuss. I will double check the notices of appearances
 24 that have already been filed in the docket and make sure
 25 the service list reflects everyone included there. I've

Page 8

1 made a note of the additional individuals we were
 2 discussing at the start of our conference today.
 3 If anyone would need to submit additional
 4 staff or courtesy service requests, feel free to e-mail
 5 me at Michael.Howard@utc.wa.gov.
 6 And in terms of circling back to the
 7 procedural schedule -- I'm sorry; I don't anticipate
 8 there being any difficulties with this schedule. I would
 9 say this as being an ALJ only proceeding. And it does
 10 appear that that hearing date would work. So I don't
 11 have any concerns from that end.
 12 Is there anything else that we should address
 13 before we adjourn?
 14 ATTORNEY STANOVSKY: Yes, a couple things
 15 from the company, your Honor.
 16 As far as -- I mean, just according to the --
 17 you know, the commission's rules on prehearing
 18 conference, one of the topics for discussion is
 19 identifying and simplifying the issues.
 20 And we just wanted to flag that, you know,
 21 consistent with the company's answer, we don't anticipate
 22 any substantial, you know, material factual dispute as to
 23 the nature or number of the violations. But I just
 24 thought we'd take the opportunity to -- and particularly
 25 given that the service issue was resolved as we answered

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| <p style="text-align: right;">Page 9</p> <p>1 over a year ago. 2 So I wanted to take the opportunity to just 3 put that out there and see if either public counsel or 4 staff is in a position, if they feel differently, to sort 5 of let us know what we might expect as far as factual 6 disputes. It seems to us that penalty is probably the 7 main issue. 8 JUDGE HOWARD: Any comments from staff or 9 public counsel? 10 ATTORNEY GAFKEN: The company has admitted to 11 violations in their response, and so that certainly does 12 narrow the issues. We don't have to argue about whether 13 there were violations. 14 And so I agree with the company in terms of 15 the scope of the hearing being related to the level of 16 penalties. 17 ATTORNEY SYKES: And your Honor, public 18 counsel concurs with both staff and company. The amount 19 of issue is the amount of penalty. 20 ATTORNEY STANOVSKY: Thank you. I recognize 21 you all didn't have to do that, so I appreciate just 22 getting cards on the table. And yes. Thank you. 23 So another topic or two, if that's all right? 24 JUDGE HOWARD: Certainly. 25 ATTORNEY STANOVSKY: One is discovery. I</p> | <p style="text-align: right;">Page 11</p> <p>1 is certainly how I would understand the issues following 2 the company's answer. 3 And although this is a -- essentially appears 4 to be a question of determining the amount of any penalty 5 and mitigation and other things of that nature, I would 6 definitely -- I was definitely looking to see what the 7 party's views were on the schedule. And I think the 8 parties have arrived at kind of what I would consider a 9 more full schedule with the prefiled testimony and things 10 of that nature. 11 But that certainly seems -- it's certainly 12 agreeable to all the parties who have stipulated to it, 13 and also seems reasonable given the maximum hypothetical 14 amount of the penalty that staff could request given the 15 complaint. So I don't have any concerns there. 16 Anything further? 17 ATTORNEY STANOVSKY: Yes. We would propose 18 entry of a protective order, just to sort of keep 19 discovery clicking along. You know, obviously there are 20 matters of locating individual customers. 21 And so I would propose a slight tweak to the 22 commission's standard protective order. And this -- I'm 23 trying to remember, your Honor. I don't think it was 24 you. I think it was Judge Pearson who handled a case 25 several years ago that I was involved with.</p> |
| <p style="text-align: right;">Page 10</p> <p>1 think we would propose the commission's normal discovery 2 rules unless anybody had objections or other thoughts? 3 JUDGE HOWARD: Any response from the 4 parties? Sorry. 5 ATTORNEY GAFKEN: Just a point of 6 clarification. Certainly the normal discovery rules is 7 what staff had anticipated. But we had also talked about 8 ratcheting down the discovery response dates along with 9 the testimony dates. 10 If that's not something that the parties want 11 to do, then we're certainly open to just leaving them at 12 ten days. We'll need to -- 13 ATTORNEY STANOVSKY: No, I'm sorry about 14 that. 15 ATTORNEY GAFKEN: -- look at the procedural 16 schedule, though. 17 ATTORNEY STANOVSKY: Apologies. I didn't 18 mean to talk over that. But no, I agree. I missed that 19 point. Yes, subject to those agreed changes in the 20 turnaround times. 21 ATTORNEY SYKES: Public counsel agrees. 22 JUDGE HOWARD: All right. Great. 23 I also understood the proposed schedule as 24 including the formal discovery, so with those adjustments 25 in response times. And that understanding of the issues</p> | <p style="text-align: right;">Page 12</p> <p>1 But we had a standard protective order in 2 place, and we circled back later during discovery for an 3 additional waiver of the commission's rules for 4 protection of customer's information because there's no 5 exception in that WAC for discovery to a party other than 6 the commission. 7 So just to completely make sure the company 8 is covered on including customer information in discovery 9 responses to public counsel, we would request that the 10 standard protective order be modified to include waiver 11 of WAC 480-70-421 to the extent necessary to permit 12 confidential discovery of protected customer information 13 or otherwise personally identifiable information that 14 might be protected by that -- you know, general privacy 15 laws that the company is subject to. 16 And to point the commission, your Honor, to 17 the order that -- the add-on order from the previous 18 time, that was Order 03 in Docket TG-18023 issued July 19 17, 2019, according to my records. So that would have an 20 example of sort of the rationale and the ALJ's 21 acceptance. 22 So we figured we'd just get that on the 23 initial order, rather than have to come back if it 24 becomes an issue. 25 But I haven't discussed that with the</p> |

3 (Pages 9 to 12)

1 parties, so open to responses or objections if they have
 2 any.
 3 ATTORNEY GAFKEN: I do have a question about
 4 the request in terms of whether the personally
 5 identifiable information about customers would still be
 6 marked confidential. I think that would be my
 7 preference. And then anybody who is signing the
 8 protective order would certainly have access to the
 9 confidential information.
 10 But I believe that the company can mark
 11 customer information, identifiable information, as
 12 confidential.
 13 ATTORNEY STANOVSKY: Yes, that would be our
 14 intent, to mark it confidential, or, I mean, simplest
 15 would be to the extent, you know, identifiable
 16 information isn't needed, you know, maybe we can have
 17 random identifiers or something. But we can work that
 18 out. If there were protected information we would mark
 19 that confidential, yes.
 20 JUDGE HOWARD: And I will turn to public
 21 counsel in a moment. But just given how the Public
 22 Records Act is read in Washington -- and I will certainly
 23 go back and read that order you referred to -- is there
 24 an exemption that would apply to the commission that
 25 would justify us withholding this data if we received a

1 more concern that that exception doesn't expressly cover
 2 sharing with it public counsel or with anybody else, and
 3 so just making sure that we don't run afoul of the
 4 customer protection information protection rule of the
 5 commission. It's not so much a PRA requirement.
 6 JUDGE HOWARD: All right. That -- go ahead.
 7 ATTORNEY STANOVSKY: No, sorry. Separate
 8 thought, please.
 9 JUDGE HOWARD: Well, this is helpful for me
 10 to think through, and I'll go read about it more. I'll
 11 ask staff and public counsel to weigh in in a moment.
 12 I wonder if this might justify referring to
 13 these affected customers by identifiers, like you were
 14 suggesting earlier.
 15 Any thoughts -- well, first I'll turn to
 16 public counsel because I skipped you before. Sykes?
 17 ATTORNEY SYKES: Yes, first of all, thank
 18 you, Ms. Gafken, for getting the clarifications. I
 19 wanted to have that clarification on the order.
 20 Mr. Stanovsky, can you read me off that order
 21 number one more time?
 22 ATTORNEY STANOVSKY: Sure. It's docket
 23 TG-181023. And it's Order 03. And it was a little
 24 different. In that case, both Waste Management and the
 25 other party -- the only other party were private parties.

1 public records request for it?
 2 That's typically a situation where we'd be
 3 compelled to hand something over. And then we have that
 4 statute allowing for the protective orders in utility and
 5 solid waste cases. But off the top of my head, I'm not
 6 sure that applies to customer information. I don't
 7 believe it does.
 8 So is there another provision that would
 9 cover us for a Public Records Act issue?
 10 ATTORNEY STANOVSKY: Well, your Honor, I
 11 didn't check the Public Records Act specifically.
 12 Obviously, your order can't change the, you
 13 know, requirements or exemptions of the Public Records
 14 Act as far as I'm aware. So we just presume that it
 15 would apply, you know, by its terms.
 16 But the commission's own regulations do
 17 provide that the company -- an exception for the
 18 company's requirement not to share customer information
 19 in the case of responding to the commission's
 20 investigation requests. So it's certainly information of
 21 a type that regularly passes between the company and the
 22 commission.
 23 And we don't have any problem -- I suppose if
 24 that's disclosable under the PRA in that circumstance,
 25 the same would be true of it in discovery here. It was

1 So the concern was a little heightened there.
 2 But nevertheless, there's on the face of WAC
 3 480-70-421 no exception for sharing information with
 4 public counsel or in the context of discovery comparable
 5 to what there is for responding to commission
 6 investigations.
 7 So maybe we're being overly cautious. But
 8 you know, we take protection of customer information
 9 seriously, as well as, you know, the commission's
 10 regulations.
 11 And we're not trying to withhold any
 12 information. We just want to make sure we've got any
 13 waiver in place to the extent there could be an argument
 14 that sharing information needed in discovery is
 15 inconsistent with another rule of the commission.
 16 ATTORNEY SYKES: Your Honor, public counsel
 17 would request some time to read that order before we
 18 agree to waive the WAC provision.
 19 ATTORNEY STANOVSKY: The company wouldn't
 20 object. I'm happy to discuss offline if helpful.
 21 JUDGE HOWARD: All right. I think the
 22 parties can certainly discuss more amongst themselves.
 23 If -- I think if any party would like to
 24 submit a response on this issue, I would request that
 25 maybe within one week of today, filed in the docket in a

Page 17

1 letter format, I believe would be suitable.
 2 And I am just glancing at this regulation
 3 right now. I can appreciate the company wanting to be on
 4 the safe side. I think, though, the Section 3 does seem
 5 to cover the situation where it's being released to
 6 resolve complaints filed by the commission.
 7 I wouldn't -- I think it's fair, though to
 8 address that in the protective order to resolve any
 9 potential ambiguity.
 10 And then I think there's a further question
 11 that I have about how the Public Records Act might affect
 12 either the commission's receipt of this information, or
 13 staff or public counsel. And perhaps the parties could
 14 work out an arrangement to just use identifiers for the
 15 affected customers so we don't make records of private
 16 individual information to resolve this issue. That's
 17 just a suggestion.
 18 ATTORNEY GAFKEN: If I might add just
 19 briefly, under the Public Records Act, the company would
 20 receive notice if the commission did receive a public
 21 records request. And there's confidential information
 22 that has been identified in the filing.
 23 And then, of course, the commission has
 24 obligations with respect to other types of information as
 25 well.

Page 18

1 But certainly anything that's marked
 2 confidential under the protective order, the company
 3 would receive a notice from the commission, and then they
 4 could seek a protective order through the superior court
 5 within ten days.
 6 The other point that I wanted to just note is
 7 that public counsel does have access to confidential
 8 information similar to the commission. Certainly the
 9 commission has the investigatory powers, and the
 10 companies must provide the information. But certainly in
 11 an adjudication, or even outside of an adjudication,
 12 under the statute 80-04-095, public counsel is also able
 13 to access the confidential information and would have to
 14 abide by the same rules and protections as the
 15 commission.
 16 So there's a couple of things -- couple of
 17 issues kind of swirling around together in this request.
 18 You know, I think it would be sufficient to
 19 have, you know, nonidentifying information in terms of
 20 customer information for purposes of this docket. Or if
 21 customer information is part of what the company
 22 provides, it could certainly be marked confidential and
 23 protected that way.
 24 ATTORNEY STANOVSKY: Thank you for that
 25 citation. I'm just checking. That's not a public

Page 19

1 counsel specific statute, right? That's --
 2 ATTORNEY GAFKEN: It refers to the attorney
 3 general's office.
 4 ATTORNEY STANOVSKY: Oh, the attorney
 5 general. There it is. Yes, thank you.
 6 ATTORNEY GAFKEN: And the commission.
 7 ATTORNEY STANOVSKY: Okay. That's helpful.
 8 To your Honor's point a moment ago about
 9 Subsection 3 of the WAC I cited, I mean, it only refers
 10 to release of information to the commission. And it --
 11 it's not clear to me whether "to the commission" includes
 12 to public counsel. Is public counsel regarded as part of
 13 the commission?
 14 I didn't frankly check the definition of
 15 commission in the WAC for that purpose. So I may be
 16 creating an issue where there is none. If so, I
 17 apologize. But it's --
 18 JUDGE HOWARD: No, that --
 19 ATTORNEY STANOVSKY: -- just something that
 20 came up in a previous case.
 21 JUDGE HOWARD: That's perfectly fine.
 22 ATTORNEY STANOVSKY: Slightly different
 23 posture.
 24 JUDGE HOWARD: No, I'm glad we're discussing
 25 this now. And if any of the parties would like to submit

Page 20

1 additional comments in a letter to the docket over the
 2 next week, that would be perfectly fine.
 3 And I'm going and looking right now at RCW
 4 81.77.210, which is what I think of as the ten-day letter
 5 statute. And also possibly the statute would be intended
 6 to -- would intend to cover any customer specific
 7 information. It refers to customer's specific usage
 8 information. So I just wanted to raise that.
 9 I will -- go ahead.
 10 ATTORNEY STANOVSKY: It appears that it would
 11 require notice to the individual customers that would be
 12 covered by the information as well. So even just
 13 providing that notice seems like it would be quite a
 14 hassle for the commission. So that seems like it might
 15 be something to try and avoid too, even if the
 16 information were ultimately protected.
 17 JUDGE HOWARD: I imagine they would prefer
 18 not to get that letter.
 19 All right. Well, thanks everyone. And I
 20 will take this under advisement. And I will look for any
 21 further responses from the parties.
 22 And I will likely plan on issuing the
 23 prehearing conference order the first week of July,
 24 because I will be out of the office next week. But that
 25 will give me enough time to receive these responses and

1 to look through this.
 2 Is there anything else that we should address
 3 before we adjourn?
 4 ATTORNEY STANOVSKY: I'm just checking my
 5 list, your Honor, but I think that's it for the company.
 6 ATTORNEY GAFKEN: Nothing more for commission
 7 staff.
 8 ATTORNEY SYKES: And there's nothing more
 9 from public counsel.
 10 ATTORNEY STANOVSKY: Nor from the company,
 11 unless Ame is remembering something I have forgotten or
 12 something has occurred to her.
 13 ATTORNEY LEWIS: Nothing here. Thank you.
 14 JUDGE HOWARD: All right. Great. Well,
 15 thank you all. I appreciate the parties conferring
 16 beforehand on this. And we are adjourned. Thank you.
 17 (Proceedings concluded at 1:55 p.m.)
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 25

C E R T I F I C A T E

1 STATE OF WASHINGTON)
 2) ss
 3 COUNTY OF KING)
 4
 5
 6

7 I, Elizabeth Patterson Harvey, a Certified Court
 8 Reporter and Registered Professional Reporter within
 9 and for the State of Washington, do hereby certify under
 10 penalty of perjury that the foregoing legal recordings
 11 were transcribed under my direction; that I received the
 12 electronic recording in the proprietary format; that I
 13 am not a relative or employee of any attorney or counsel
 14 employed by the parties hereto, nor financially
 15 interested in its outcome.

16 IN WITNESS WHEREOF, I have hereunto set my hand
 17 this 3rd day of July, 2024.
 18

19
 20
 21  
 22 ELIZABETH PATTERSON HARVEY, WA CCR 2731
 23
 24
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|---|---|--|--|---|
| <p style="text-align: center;">A</p> <p>abide 18:14 able 18:12 Absolutely 7:6 acceptance 12:21 access 13:8 18:7,13 Act 13:22 14:9,11 14:14 17:11,19 add 17:18 add-on 12:17 added 4:11 additional 8:1,3 12:3 20:1 additions 5:12 7:8 address 4:9,18 5:3 8:12 17:8 21:2 adjourn 8:13 21:3 adjourned 21:16 adjudication 18:11 18:11 adjustments 10:24 administrative 1:13 3:6 admitted 9:10 advisement 20:20 affect 17:11 afoul 15:3 afternoon 3:18,25 4:5 ago 9:1 11:25 19:8 agree 9:14 10:18 16:18 agreeable 11:12 agreed 5:24 6:6 10:19 agrees 10:21 ahead 6:2 15:6 20:9 ALewis6@wm.c... 2:12 ALJ 8:9 ALJ's 12:20 allowing 14:4 ambiguity 17:9 Ame 2:8 3:21 21:11 amount 9:18,19</p> | <p>11:4,14 answer 8:21 11:2 answered 8:25 anticipate 8:7,21 anticipated 10:7 anybody 10:2 13:7 15:2 Apologies 10:17 apologize 5:3 19:17 appear 8:10 appearance 3:24 4:15,20 appearances 3:16 7:23 appearing 4:2 appears 11:3 20:10 applies 14:6 apply 13:24 14:15 appreciate 7:5 9:21 17:3 21:15 argue 9:12 argument 16:13 arrangement 17:14 arrived 11:8 assistant 4:1,6,25 attorney 2:16,22 3:18,25 4:2,5,6,14 4:21 5:5,7,8,13,23 6:3,25 7:6,15,17 7:19 8:14 9:10,17 9:20,25 10:5,13 10:15,17,21 11:17 13:3,13 14:10 15:7,17,22 16:16 16:19 17:18 18:24 19:2,2,4,4,6,7,19 19:22 20:10 21:4 21:6,8,10,13 22:13 attorneys 4:22 Avenue 2:5,10,23 avoid 20:15 aware 14:14</p> <p style="text-align: center;">B</p> <p>back 8:6 12:2,23</p> | <p>13:23 beginning 3:16 behalf 4:2 believe 13:10 14:7 17:1 Box 2:17 briefly 17:19 briefs 6:22 business 6:11,14</p> <p style="text-align: center;">C</p> <p>C 2:1 22:1,1 call 3:14 5:15 captioned 3:9 cards 9:22 case 4:25 11:24 14:19 15:24 19:20 cases 14:5 cautious 16:7 CC 7:4 CCR 1:24 22:22 certainly 4:9,12 9:11,24 10:6,11 11:1,11,11 13:8 13:22 14:20 16:22 18:1,8,10,22 Certified 22:7 certify 22:9 chance 5:20 change 14:12 changes 10:19 check 7:23 14:11 19:14 checking 18:25 21:4 circled 12:2 circling 8:6 circumstance 14:24 citation 18:25 cited 19:9 clarification 10:6 15:19 clarifications 7:8 15:18 clear 19:11 clicking 11:19</p> | <p>Clinton 2:3 come 12:23 comments 9:8 20:1 commission 1:2,4 1:15 2:14 3:7,10 12:6,16 13:24 14:22 15:5 16:5 16:15 17:6,20,23 18:3,8,9,15 19:6 19:10,11,13,15 20:14 21:6 commission's 8:17 10:1 11:22 12:3 14:16,19 16:9 17:12 companies 18:10 company 2:2 3:17 3:22 6:9 8:15 9:10,14,18 12:7 12:15 13:10 14:17 14:21 16:19 17:3 17:19 18:2,21 21:5,10 company's 4:10 8:21 11:2 14:18 comparable 16:4 compelled 14:3 Complainant 1:5 complaint 11:15 complaints 17:6 completely 12:7 concern 15:1 16:1 concerns 8:11 11:15 concluded 21:17 concurs 9:18 conference 1:11 3:8 3:12 5:12 6:4,5 7:10,14 8:2,18 20:23 conferring 21:15 confidential 12:12 13:6,9,12,14,19 17:21 18:2,7,13 18:22</p> | <p>confirm 7:3 consent 3:14 consider 11:8 consistent 8:21 context 16:4 corrections 5:12 correctly 7:3 counsel 2:20 3:22 4:4,7,11 6:9 7:18 9:3,9,18 10:21 12:9 13:21 15:2 15:11,16 16:4,16 17:13 18:7,12 19:1,12,12 21:9 22:13 COUNTY 22:5 couple 4:17 8:14 18:16,16 course 17:23 court 18:4 22:7 courtesy 8:4 cover 14:9 15:1 17:5 20:6 covered 12:8 20:12 creating 19:16 Cross 6:18 cross-answering 6:12 customary 5:22 customer 12:8,12 13:11 14:6,18 15:4 16:8 18:20 18:21 20:6 customer's 12:4 20:7 customers 11:20 13:5 15:13 17:15 20:11</p> <p style="text-align: center;">D</p> <p>D 2:21 data 7:11 13:25 date 6:20 8:10 dates 7:1 10:8,9 Davis 2:4 3:19 day 22:17</p> |
|---|---|--|--|---|

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|--|--|--|---|--|
| days 6:11,14 10:12 18:5 | employee 22:13 | further 11:16 17:10 20:21 | 12:16 14:10 16:16 21:5 | interested 22:15 |
| deadline 6:16 | entry 4:15 11:18 | | Honor's 19:8 | intervene 5:15 |
| deadlines 6:11 | errata 6:18 | G | Howard 1:13 3:4,5 3:23 4:1,3,8,19 | investigation 14:20 |
| December 6:13 | essentially 7:11 11:3 | Gafken 2:15 3:25 4:1 5:23 6:3,25 | 5:10,14 6:1,24 7:2 7:7,21 9:8,24 10:3 | investigations 16:6 |
| definitely 11:6,6 | estimates 6:18 | 7:6,15 9:10 10:5 10:15 13:3 15:18 | 10:22 13:20 15:6 15:9 16:21 19:18 | investigatory 18:9 |
| definition 19:14 | example 12:20 | 17:18 19:2,6 21:6 | 19:21,24 20:17 21:14 | involved 11:25 |
| determining 11:4 | exception 12:5 14:17 15:1 16:3 | general 2:16,22 4:2 4:6 12:14 19:5 | hypothetical 11:13 | issue 8:25 9:7,19 12:24 14:9 16:24 17:16 19:16 |
| different 15:24 19:22 | exemption 13:24 | general's 19:3 | | issued 12:18 |
| differently 9:4 | exemptions 14:13 | getting 9:22 15:18 | I | issues 8:19 9:12 10:25 11:1 18:17 |
| difficulties 8:8 | exhibits 6:18 | give 5:2 20:25 | identifiable 12:13 13:5,11,15 | issuing 20:22 |
| direction 22:11 | expect 9:5 | given 8:25 11:13,14 13:21 | identified 17:22 | item 6:5 |
| disclosable 14:24 | expressly 15:1 | glad 19:24 | identifiers 13:17 15:13 17:14 | J |
| discovery 6:10,14 6:16 9:25 10:1,6,8 10:24 11:19 12:2 12:5,8,12 14:25 16:4,14 | extent 12:11 13:15 16:13 | glancing 17:2 | identifying 8:19 | January 6:16 |
| | F | go 5:20,25 6:2 13:23 15:6,10 20:9 | imagine 5:17 20:17 | judge 1:13 3:4,6,23 3:25 4:3,8,19 5:10 5:14 6:1,24 7:2,7 7:21 9:8,24 10:3 10:22 11:24 13:20 15:6,9 16:21 19:18,21,24 20:17 21:14 |
| discuss 5:20,21,24 7:23 16:20,22 | F 22:1 | going 5:18 20:3 | include 12:10 | July 6:6 12:18 20:23 22:17 |
| discussed 12:25 | face 16:2 | good 3:18,25 4:5 7:2 | included 4:15,23 7:25 | jump 5:5 |
| discussing 8:2 19:24 | factual 8:22 9:5 | Goodwin 5:2 | includes 19:11 | June 1:12 3:1 |
| discussion 5:18 8:18 | fair 17:7 | great 6:1 7:21 10:22 21:14 | including 7:10,13 10:24 12:8 | justify 13:25 15:12 |
| dispute 8:22 | far 8:16 9:5 14:14 | | inconsistent 16:15 | |
| disputes 9:6 | February 6:20,21 | H | Incorporated 3:11 | K |
| docket 1:6 3:9 7:24 12:18 15:22 16:25 18:20 20:1 | feel 5:11 8:4 9:4 | hand 14:3 22:16 | individual 11:20 17:16 20:11 | keep 11:18 |
| | Fifth 2:5,23 | handled 11:24 | individuals 8:1 | kind 11:8 18:17 |
| double 7:23 | figured 12:22 | happen 6:20 | information 12:4,8 12:12,13 13:5,9 13:11,11,16,18 14:6,18,20 15:4 16:3,8,12,14 17:12,16,21,24 18:8,10,13,19,20 18:21 19:10 20:7 20:8,12,16 | KING 22:5 |
| due 6:7,10,13,14,22 | filed 7:24 16:25 17:6 | happy 16:20 | inhouse 3:21 4:10 | know 8:17,20,22 9:5 11:19 12:14 13:15,16 14:13,15 16:8,9 18:18,19 |
| E | file 15:15,17 20:23 five 6:14 | Harvey 1:24 22:7 22:22 | intend 20:6 | L |
| E 2:1,1 22:1,1 | flag 8:20 | hassle 20:14 | intended 20:5 | Lacey 1:16 |
| e-mail 5:3,11 6:25 7:4 8:4 | Foley 4:25 | head 14:5 | intent 13:14 | law 1:13 3:6 |
| earlier 15:14 | folks 4:17 | hearing 5:17 6:21 7:9 8:10 9:15 | | laws 12:15 |
| easier 7:1 | following 11:1 | heightened 16:1 | | leaving 10:11 |
| either 9:3 17:12 | foregoing 22:10 | helpful 15:9 16:20 19:7 | | legal 4:25 22:10 |
| electronic 22:12 | forgotten 21:11 | | | |
| Elizabeth 1:24 22:7 22:22 | formal 10:24 | hereto 22:14 | | |
| emails 4:24 | format 17:1 22:12 | hereunto 22:16 | | |
| employed 22:14 | frankly 19:14 | Honor 3:19 4:5,14 8:15 9:17 11:23 | | |
| | free 5:11 8:4 | | | |
| | full 11:9 | | | |

| | | | | |
|--|--|---|--|---|
| <p>Let's 3:4,16 letter 17:1 20:1,4 20:18 letterhead 4:16 level 9:15 Lewis 2:8 3:21 4:12 5:5,8 21:13 Lisa 2:15 4:1 lisa.gafken@atg... 2:19 list 4:12,17 7:25 21:5 little 15:23 16:1 LLP 2:4 locating 11:20 look 10:15 20:20 21:1 looking 11:6 20:3 Loop 1:16</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>main 4:11 9:7 making 15:3 Management 1:7 2:9 3:11,20 5:2 7:20 15:24 March 6:22 mark 13:10,14,18 marked 13:6 18:1 18:22 material 8:22 matters 11:20 maximum 11:13 mean 8:16 10:18 13:14 19:9 Michael 1:13 3:5 Michael.Howard... 8:5 missed 10:18 mitigation 11:5 modified 12:10 moment 5:2 13:21 15:11 19:8</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>N 2:1</p> | <p>N-A-N-C-Y-F-O-... 5:1 name 3:5 4:1,6 Nancy 4:25 narrow 9:12 nature 8:23 11:5,10 NE 2:10 necessary 12:11 need 5:25 8:3 10:12 needed 13:16 16:14 nevertheless 16:2 nonidentifying 18:19 normal 10:1,6 note 8:1 18:6 noted 4:19 notice 4:19 17:20 18:3 20:11,13 notices 7:23 noting 4:10 November 6:10 number 6:19 8:23 15:21</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>o0o- 3:2 object 16:20 objection 7:13,15 7:17,19 objections 10:2 13:1 obligations 17:24 obviously 11:19 14:12 occurred 21:12 October 6:7 office 2:16 19:3 20:24 offline 5:21 16:20 Oh 19:4 Okay 6:3 19:7 Olympia 2:18 open 10:11 13:1 opportunity 5:23 8:24 9:2 order 7:11,14</p> | <p>11:18,22 12:1,10 12:17,17,18,23 13:8,23 14:12 15:19,20,23 16:17 17:8 18:2,4 20:23 orders 14:4 Oregon 2:11 outcome 22:15 outside 18:11 overly 16:7</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>P 2:1,1 p.m 3:1,5 21:17 P.O 2:17 PAGES 1:9 part 3:15 18:21 19:12 particularly 8:24 parties 5:19,21 7:4 10:4,10 11:8,12 13:1 15:25 16:22 17:13 19:25 20:21 21:15 22:14 party 7:7,12 12:5 15:25,25 16:23 party's 11:7 passes 14:21 Patterson 1:24 22:7 22:22 Pearson 11:24 penalties 9:16 penalty 9:6,19 11:4 11:14 22:10 perfectly 19:21 20:2 perjury 22:10 permit 12:11 personally 12:13 13:4 place 12:2 16:13 plan 7:9 20:22 please 4:14 6:1 15:8 point 4:24 6:10 10:5,19 12:16</p> | <p>18:6 19:8 Portland 2:11 position 9:4 possibly 20:5 posture 19:23 potential 17:9 powers 18:9 PRA 14:24 15:5 practice 5:22 prefer 4:18 20:17 preference 13:7 prefiled 11:9 prehearing 1:11 3:8,12 6:4 7:10,14 8:17 20:23 present 5:25 presume 14:14 presuming 3:14 previous 12:17 19:20 privacy 12:14 private 15:25 17:15 probably 9:6 problem 14:23 procedural 5:20 8:7 10:15 proceeding 5:16,19 7:13 8:9 Proceedings 21:17 Professional 22:8 propose 10:1 11:17 11:21 proposed 10:23 proprietary 22:12 protected 12:12,14 13:18 18:23 20:16 protection 12:4 15:4,4 16:8 protections 18:14 protective 11:18,22 12:1,10 13:8 14:4 17:8 18:2,4 provide 14:17 18:10 provides 18:22</p> | <p>providing 20:13 provision 14:8 16:18 public 2:20 4:4,7 6:9 7:17 9:3,9,17 10:21 12:9 13:20 13:21 14:1,9,11 14:13 15:2,11,16 16:4,16 17:11,13 17:19,20 18:7,12 18:25 19:12,12 21:9 purpose 19:15 purposes 18:20 put 9:3</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>question 11:4 13:3 17:10 quite 20:13</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>R 2:1 22:1 raise 20:8 random 13:17 ratchet 6:15 ratcheting 10:8 rationale 12:20 RCW 20:3 read 13:22,23 15:10,20 16:17 reasonable 11:13 rebuttal 6:12 receipt 17:12 receive 17:20,20 18:3 20:25 received 13:25 22:11 recipients 4:22 recognize 9:20 record 3:4 5:25 recorded 3:15 recording 3:12 22:12 recordings 22:10 records 12:19</p> |
|--|--|---|--|---|

| | | | | |
|--|---|---|---|--|
| <p>13:22 14:1,9,11 14:13 17:11,15,19 17:21 reduce 6:11 referred 13:23 referring 15:12 refers 19:2,9 20:7 reflects 7:25 regarded 19:12 Registered 22:8 regularly 14:21 regulation 17:2 regulations 14:16 16:10 related 9:15 relative 22:13 release 19:10 released 17:5 remain 3:13 remember 11:23 remembering 21:11 Reporter 22:8,8 representing 3:20 request 11:14 12:9 13:4 14:1 16:17 16:24 17:21 18:17 requested 4:22 requests 7:11 8:4 14:20 require 20:11 requirement 7:10 14:18 15:5 requirements 14:13 requiring 7:11 resolve 17:6,8,16 resolved 8:25 respect 17:24 Respondent 1:9 responding 14:19 16:5 response 6:9,11 9:11 10:3,8,25 16:24</p> | <p>responses 6:14 7:12 12:9 13:1 20:21 20:25 right 3:13 4:8 5:10 5:14,17 6:24 7:9 7:21 9:23 10:22 15:6 16:21 17:3 19:1 20:3,19 21:14 Rob 4:6 Robert 2:21 robert.sykes@at... 2:25 rule 15:4 16:15 rules 8:17 10:2,6 12:3 18:14 run 15:3</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>S 2:1 S-G-O-O-D-W-I... 5:9 Sabrina 5:1 safe 17:4 schedule 5:19,20 5:24,24 8:7,8 10:16,23 11:7,9 scope 9:15 SE 1:16 Seattle 2:6,24 seconds 5:4 Section 17:4 see 9:3 11:6 seeing 4:12 7:22 seek 18:4 Separate 15:7 seriously 16:9 service 4:11,17 7:25 8:4,25 set 22:16 settlement 6:5 seven 6:11 share 14:18 shared 7:12 sharing 15:2 16:3 16:14</p> | <p>side 17:4 signing 13:7 similar 18:8 simplest 13:14 simplifying 8:19 simultaneous 6:22 situation 14:2 17:5 skipped 15:16 slight 11:21 Slightly 19:22 solid 14:5 sorry 8:7 10:4,13 15:7 sort 9:4 11:18 12:20 specific 19:1 20:6,7 specifically 14:11 Square 1:16 ss 22:4 staff 2:14 3:24 4:2 4:17 6:7,12 7:15 8:4 9:4,8,18 10:7 11:14 15:11 17:13 21:7 standard 11:22 12:1,10 Stanovsky 2:3 3:18 3:19 4:14,21 5:7 5:13 7:19 8:14 9:20,25 10:13,17 11:17 13:13 14:10 15:7,20,22 16:19 18:24 19:4,7,19 19:22 20:10 21:4 21:10 start 3:16 8:2 starts 6:3 State 22:3,9 statute 14:4 18:12 19:1 20:5,5 stipulated 11:12 subject 10:19 12:15 submit 8:3 16:24 19:25 submitted 4:16</p> | <p>Subsection 19:9 substantial 8:22 sufficient 18:18 suggesting 15:14 suggestion 17:17 suitable 17:1 Suite 2:5,23 superior 18:4 support 7:16 suppose 14:23 sure 5:7 7:24 12:7 14:6 15:3,22 16:12 swirling 18:17 Sykes 2:21 4:5,6 7:17 9:17 10:21 15:16,17 16:16 21:8</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>T 22:1,1 table 9:22 take 8:24 9:2 16:8 20:20 talk 10:18 talked 10:7 ten 10:12 18:5 ten-day 20:4 terms 8:6 9:14 13:4 14:15 18:19 testimony 6:7,12 10:9 11:9 TG-18023 12:18 TG-181023 15:23 TG-240189 1:6 3:9 thank 3:23 4:3,8 5:10,13 7:21 9:20 9:22 15:17 18:24 19:5 21:13,15,16 thanks 20:19 things 6:19 8:14 11:5,9 18:16 think 4:21,23 6:18 7:3 10:1 11:7,23 11:24 13:6 15:10 16:21,23 17:4,7</p> | <p>17:10 18:18 20:4 21:5 thought 8:24 15:8 thoughts 10:2 15:15 time 3:5 6:13 12:18 15:21 16:17 20:25 times 10:20,25 today 3:8 5:12,18 6:4 8:2 16:25 top 14:5 topic 9:23 topics 8:18 transcribed 1:24 22:11 transcribing 3:13 Transportation 1:2 1:4,15 3:7,10 Tremaine 2:4 3:19 true 14:25 try 20:15 trying 11:23 16:11 turn 13:20 15:15 turnaround 10:20 tweak 11:21 two 5:4 9:23 type 14:21 types 17:24 typically 14:2</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>ultimately 20:16 understand 11:1 understanding 10:25 understood 10:23 unit 4:7 usage 20:7 use 17:14 usually 6:19,19 Utilities 1:2,4,15 3:6,10 utility 14:4</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>versus 3:10</p> |
|--|---|---|---|--|

| | | | | |
|--------------------------------------|--------------------------------------|-----------------|--|--|
| views 11:7 | 17:14 | <u>5</u> | | |
| violations 8:23 9:11 9:13 | wouldn't 16:19 17:7 | 55th 2:10 | | |
| virtually 3:21 | Wright 2:4 3:19 | <u>6</u> | | |
| VOL 1:11 | | 621 1:16 | | |
| vs 1:6 | <u>X</u> | <u>7</u> | | |
| <u>W</u> | <u>Y</u> | 7227 2:10 | | |
| W 2:15 | year 9:1 | <u>8</u> | | |
| WA 1:24 22:22 | years 11:25 | 80-04-095 18:12 | | |
| WAC 12:5,11 16:2 16:18 19:9,15 | <u>Z</u> | 800 2:23 | | |
| waive 16:18 | <u>0</u> | 81.77.210 20:4 | | |
| waiver 12:3,10 16:13 | 03 12:18 15:23 | <u>9</u> | | |
| Walker 2:3 3:19 5:5 | <u>1</u> | 920 2:5 | | |
| walkerstanovsky ... 2:7 | 1-22 1:9 | 97218 2:11 | | |
| want 10:10 16:12 | 1:30 3:1,5 | 98104 2:6,24 | | |
| wanted 8:20 9:2 15:19 18:6 20:8 | 1:55 21:17 | 98504 1:16 2:18 | | |
| wanting 17:3 | 10 6:20 | | | |
| Washington 1:1,4 1:8,15,16 2:6,18 | 17 12:19 | | | |
| 2:22,24 3:6,9,11 | 18 6:21,23 | | | |
| 13:22 22:3,9 | 19 6:6 | | | |
| waste 1:7 2:9 3:10 3:20 5:2 7:19 | <u>2</u> | | | |
| 14:5 15:24 | 20 6:13 | | | |
| way 18:23 | 2000 2:23 | | | |
| we'll 5:17 10:12 | 2019 12:19 | | | |
| we're 3:8,14 10:11 16:7,11 19:24 | 2024 1:12 3:1 6:6,8 6:10,13 22:17 | | | |
| we've 6:6 16:12 | 2025 6:17,20,21,23 | | | |
| week 16:25 20:2,23 20:24 | 21 1:12 3:1 | | | |
| weigh 15:11 | 22 6:7,10 | | | |
| WHEREOF 22:16 | 27 6:16 | | | |
| wishes 5:15 | 2731 1:24 22:22 | | | |
| withhold 16:11 | <u>3</u> | | | |
| withholding 13:25 | 3 17:4 19:9 | | | |
| WITNESS 22:16 | 3300 2:5 | | | |
| wonder 15:12 | 3rd 22:17 | | | |
| Woodland 1:16 | <u>4</u> | | | |
| work 8:10 13:17 | 40128 2:17 | | | |
| | 480-70-421 12:11 16:3 | | | |