



1 **What are the duties of your current position?**

2 Working directly with road authorities on projects such as at-grade crossing elimination,  
3 crossing improvement and modification projects, maintenance, grade separation, quiet zone, and  
4 other public projects.

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6 **In his prefiled testimony, Brett Johnson indicated that federal funds are being used to**  
7 **upgrade the Barker Road Crossing. Do you know what type of federal funds these are?**

8 Not specifically. It is my understanding this project is not part of the Railway-Highway  
9 Crossing program managed by the State of Washington to provide funding for safety  
10 improvements to reduce the number of fatalities, injuries, and crashes at public grade crossing,  
11 known as Section 130 to provide agencies funding specifically for safety improvement projects.

12

13 **DECLARATION**

14 I, PEGGY YGBUHAY, declare under penalty of perjury under the laws of the State of  
15 Washington that the foregoing PREFILED TESTIMONY OF PEGGY YGBUHAY is true and  
16 correct to the best of my knowledge and belief.

17

18 DATED this 26<sup>th</sup> day of April 2022.

19

20 /s/ Peggy Ygbuhay  
21 PEGGY YGBUHAY

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1 **DECLARATION OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that I  
3 caused a true and correct copy of the foregoing to be served via the methods below on this 26<sup>th</sup>  
4 day of April, 2022 on the following counsel/party of record:

|   |  |
|---|--|
| 5 Kenneth W. Harper<br>6 MENKE JACKSON BEYER, LLP<br>7 807 N. 39 <sup>th</sup> Avenue<br>8 Yakima, WA 98902<br>9 Phone: (509) 575-0313<br>10 Email: <a href="mailto:kharper@mjbe.com">kharper@mjbe.com</a><br><a href="mailto:zfoster@mjbe.com">zfoster@mjbe.com</a><br><a href="mailto:gplant@mjbe.com">gplant@mjbe.com</a><br><a href="mailto:Julie@mjbe.com">Julie@mjbe.com</a><br><i>Attorneys for City of Spokane Valley</i> | <input type="checkbox"/> via U.S. Mail, first class, postage<br>prepaid<br><input type="checkbox"/> via Legal Messenger Hand Delivery<br><input type="checkbox"/> via Facsimile<br><input checked="" type="checkbox"/> via E-mail: |
| 11 Washington Utilities & Transportation<br>12 Commission   | <input checked="" type="checkbox"/> <a href="http://efiling.utc.wa.gov/form">efiling.utc.wa.gov/form</a>   |
| 13 Jeff Roberson<br>14 Assistant Attorney General<br>15 Office of the Attorney General<br>16 Utilities and Transportation Division<br>17 P.O. Box 40128<br>18 Olympia, WA 98504-0128<br>19 Phone: (360) 664-1188<br>20 E-mail: <a href="mailto:jeff.roberson@utc.wa.gov">jeff.roberson@utc.wa.gov</a><br><a href="mailto:betsy.demarco@utc.wa.gov">betsy.demarco@utc.wa.gov</a>   | <input type="checkbox"/> via U.S. Mail, first class, postage<br>prepaid<br><input type="checkbox"/> via Legal Messenger Hand Delivery<br><input type="checkbox"/> via Facsimile<br><input checked="" type="checkbox"/> via E-mail: |

21 /s/ Elizabeth Pina  
22 Elizabeth Pina, Legal Assistant  
[Elizabeth.Pina@lewisbrisbois.com](mailto:Elizabeth.Pina@lewisbrisbois.com)