

Exhibit No. JLM-1T  
Docket No. TG-200250  
Witness: Jeffery McMahon

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Application of:**

**DOCKET TG-200250**

**ADE DUMPSTERS, LLC**

**for Authority to Operate as a Solid Waste  
Collection Company in Washington**

Direct Testimony of

**JEFFERY L. MCMAHON**

On behalf of Waste Management of Washington, Inc.

December 9, 2020

## **Table of Contents**

I.	Experience and Summary of Testimony	1
II.	Waste Management Already Provides the Drop Box Services that ADE Proposes	3
III.	Damage Rarely Results from Waste Management's Drop Box Services	9

1                   **I.       EXPERIENCE AND SUMMARY OF TESTIMONY**

2

3   **Q.     Please state your name and business address.**

4   A.     My name is Jeffery L. McMahon. My business address is 6211 234<sup>th</sup> Street  
5           Southeast, Woodinville, WA 98072.

6

7   **Q.     By whom are you employed and in what capacity?**

8   A.     I am employed by Waste Management of Washington, Inc. (“Waste Management”)  
9           d/b/a Waste Management – North Sound and Waste Management - Marysville as a  
10          District Manager.

11

12 **Q.     What is the purpose of your testimony?**

13 A.     First, I will testify about the many options Waste Management offers its drop box  
14          customers in the area of overlap with ADE’s application. Second, I will discuss  
15          how we avoid damage when serving our customers, and how we rectify damage on  
16          those rare occasions when it occurs.

17

18 **Q.     Would you please describe your professional employment experience?**

19 A.     I joined Waste Management in April, 1989, and have served in management for  
20          20 years, including 13 years as a District Manager.

21                 Prior to joining Waste Management, I worked for a trucking company for  
22          nine years driving semi-trucks. I continued as a full-time driver for my first 13  
23          years at Waste Management, as both a residential and commercial collection driver,

1 a roll-off driver, and a driver trainer. I drove roll-off trucks for about four of those  
2 years.

3 In 2000, I became a Route Manager, and then in 2007 a District Manager,  
4 first for what was then Waste Management's Bothell, Washington site, and then its  
5 Kirkland / King County site. In 2011, Waste Management merged those sites with  
6 operations farther north and I became the District Manager of what is now the North  
7 Sound operation. I also oversee the District Manager directly responsible for our  
8 Marysville and Skagit operations.

9  
10 **Q. Please describe your relevant professional qualifications and training.**

11 A. I earned my commercial driver's license ("CDL") in 1984 and have maintained it  
12 ever since. In my 32 years with Waste Management, I have also received, and  
13 continue to receive, a wide range of training covering safety, environmental  
14 protection, business and financial management, and personnel issues in the solid  
15 waste hauling industry, among others.

16  
17 **Q. What are your primary responsibilities for Waste Management?**

18 A. As District Manager, I oversee all Waste Management's day-to-day operations  
19 based in Woodinville, Washington, including sizeable areas of King County subject  
20 to the Washington Utilities and Transportation Commission's ("Commission" or  
21 "UTC") jurisdiction over solid waste collection under UTC Tariff No. 19. Including  
22 both UTC-jurisdictional and locally contracted service areas, North Sound is the

1 seventh-largest Waste Management operation in the United States, with 137 daily  
2 routes (commercial and residential) and 250 employees.

3 The North Sound operation that I oversee provides drop box service subject  
4 to UTC jurisdiction in King County roughly within the area from Interstate 90 north  
5 and from around the north end of Lake Washington east to the northeast corner of  
6 the county. All of that area is within the area ADE Dumpsters LLC (“ADE”)  
7 proposes to serve in its certificate application in this docket. Within that area, I am  
8 ultimately responsible for Waste Management staffing and collection scheduling;  
9 making sure we have enough collection vehicles and other equipment in good  
10 working order to make our collections; dealing with requests for new, changed, or  
11 individually-scheduled service; responding to other safety and collection issues  
12 from customers and the general public; and ensuring Waste Management maintains  
13 compliance with applicable regulations and other requirements.

14  
15 **II. WASTE MANAGEMENT ALREADY PROVIDES THE DROP BOX**  
16 **SERVICES THAT ADE PROPOSES**

17  
18 **Q. Please describe Waste Management’s drop box services.**

19 A. As discussed in Mr. Weinstein’s testimony, we offer drop box service in 10, 15, 20,  
20 25, 30, and 40-yard containers. Just in the North Sound fleet, we have about 25 roll-  
21 off trucks to deliver and haul these containers. We also offer smaller dumpsters at  
22 two-yard increments below 10 yards, though I understand ADE is not proposing to  
23 provide service that small.

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**Q. When a customer wants new service in one of those containers, how can they get it from Waste Management?**

A. A new drop box customer would call Waste Management’s customer service line. The Waste Management representative will make sure the customer is in a location and wants a commodity hauled that are within Waste Management’s UTC certificate or city franchised authority. Then they will discuss the customer’s needs, like sending the right size of box for what they need hauled. For waste from a household cleanout, up to a 30-yard box might be appropriate because those materials aren’t too heavy. You might have two to three tons in the box. With something like roofing shingles or concrete though, the call center would probably tell a customer to take no more than a 10- or 20-yard box, because those materials get much heavier. You could probably load 20 tons of shingles into a 30-yard box, but we wouldn’t want to do that.

The call center will also ask the customer about where the container is going to be placed and discuss the best option. Driveways are typical. They aren’t usually made for heavy equipment, so that’s something the call center will take into account and why they would usually recommend a smaller box for heavier loads. For heavy materials like concrete or shingles, we wouldn’t recommend placing the box on grass or dirt because the loaded truck might sink into the ground. In hot times of the year, heavy containers can sometimes sink into asphalt, too. The call center will take all of that information into account to recommend the right size of container,

1 and can discuss other steps the customer can take, like having wood available to put  
2 down when the driver delivers the box to protect the surface below.

3  
4 **Q. What happens when the driver arrives to drop off the box?**

5 A. Our drivers are well-trained and experienced. They're good at what they do, and  
6 they evaluate the situation again when they arrive at the customer's site. When they  
7 see the situation on the ground, they'll identify potential problems and warn the  
8 customer if they believe damage could result, including due to heavy materials the  
9 customer plans to put in the box. Ultimately, it would be the customer's decision to  
10 approve the final plan after hearing any risks from the driver—but as I discuss  
11 below, damage resulting from the weight and placement of drop boxes is rare in my  
12 experience. If the customer has wood or other materials on hand to protect the  
13 ground, our driver will place the box on the wood for protection.

14  
15 **Q. Have you read the testimony from Anthony Douglas filed by ADE in this case?**

16 A. Yes.

17  
18 **Q. Mr. Douglas is asked how he proposes to correct “deficiencies” in available  
19 drop box services and responds that ADE has “same day pick up and deliver  
20 and can provide multiple pick ups in the same day.”<sup>1</sup> Does Waste Management  
21 offer those services?**

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<sup>1</sup> Exh. ACD-1T at 5:9-10.

1 A. Yes. Regarding same-day service, if we receive a call by 10:00 a.m. and have the  
2 equipment and drivers available, we will schedule service the same day. That  
3 includes not only dropping off the box initially, but also hauling, potentially even  
4 multiple loads the same day. In my experience at North Sound, we do this almost  
5 every day.

6 With pre-scheduled service, it's also common for needs to change on the  
7 day, and we can typically accommodate that, too. Often our driver is the one talking  
8 to the customer at the site. If the customer requests another haul on the spot, the  
9 driver will call that request into our dispatch center, who will figure out how to get  
10 the haul scheduled and done.

11

12 **Q. What about multiple hauls in one day?**

13 A. No problem. If scheduled in advance, we often assign a dedicated driver to a single  
14 job site. If a customer commits to seven loads in a day, we'll run them all day. Or  
15 if a customer needed a driver for half a day once a week, or whatever their need is,  
16 we'll meet it, as long as there's a plan worked out with their salesperson. I've never  
17 seen an issue with our inability to do multiple trips in a day. For big sites, the  
18 customer will have the direct phone number for an individual sales representative to  
19 set things up. We even have an "Easy Button" line where the customer hits a  
20 button, a ticket is created automatically and the haul goes through.

21



1 **Q. ADE’s witness Shom Barrientos claims that ADE would offer weekend**  
2 **pickups, which would “set[] ADE Dumpsters apart from the solid waste**  
3 **companies[.]” Do you agree?**

4 A. No. We typically provide drop box service on weekdays, but we will make  
5 accommodations for customers including weekend service when needed, especially  
6 if there’s an urgent need. We have one North Sound drop box haul that happens  
7 regularly on Saturdays, and could do so for others as well.

8  
9 **Q. Mr. Douglas also claims that his equipment is “different” because his**  
10 **containers are only four feet high, allowing easier loading.<sup>2</sup> Does Waste**  
11 **Management offer such containers?**

12 A. Yes. We have multiple low-sided container options up to 30 yards, including 10-  
13 and 20-yard containers under 4 feet tall.

14  
15 **Q. How often are you able to accommodate customers’ drop box needs?**

16 A. Almost always. We are proud of our great service and we’re committed to get those  
17 hauls done for the customer. In the peak season, there may be times when we can’t  
18 accommodate a request, but it’s rare. We usually have trained backup drivers  
19 available to cover our service obligations if a driver calls in sick or takes vacation.  
20 We always have some drivers who want overtime and are willing to work later than  
21 scheduled. And as I said, we have about 25 roll-off vehicles to serve drop box  
22 customers—enough to rotate them out for maintenance and still have a backup

1 available at all but the very busiest times. Especially if a customer is in a situation  
2 where a haul absolutely needs to be done, we'll do everything we can to make it  
3 happen. No backup plan is perfect, but the vast majority of the time we're able to  
4 serve our customers with no interruption even when a driver or equipment is  
5 unexpectedly unavailable.

6

7 **Q. ADE also claims that it will offer various other services, such as cleaning up for**  
8 **the customer, loading drop boxes, and delivering construction and landscaping**  
9 **commodities. Does Waste Management offer those services?**

10 A. No. We are a solid waste hauling company, and those services are beyond our  
11 business model. I also understand, based on Mr. Weinstein's testimony, that those  
12 services are beyond the scope of a UTC certificate.

13 However, we do make every effort to prevent and clean up any kind of mess  
14 that occurs in the course of our services, as Mr. Weinstein explains. Safety is our  
15 top priority, and all our drivers receive monthly training around customer service,  
16 environmental impacts, and handling all types of incidents that may happen in the  
17 course of service.

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<sup>2</sup> Exh. ACD-1T at 16:28-17:5.



1 **Q. Mr. Douglas claims that a Waste Management roll-off truck plus drop box**  
2 **“when loaded could easily exceed 60,000 pounds[.]”<sup>3</sup> Is he correct?**

3 A. Not for smaller drop boxes like those ADE wants to compete with, and not on the  
4 kinds of sites he describes. I’ve explained how Waste Management works to  
5 understand the customer’s needs and choose the right container option given the  
6 type of waste and the drop site. We just don’t see the kinds of weight-related  
7 damage he describes. We occasionally see a container leave marks if it sits too long  
8 in one spot on an asphalt driveway, but that’s why we like to see customers put  
9 down wood underneath. When it comes to concrete driveways, I have never seen  
10 weight be an issue in our drop box services.

11

12 **Q. Mr. Douglas also claims that the height of a Waste Management truck and**  
13 **container, fully loaded, “create a hazard to overhead electrical, cable and**  
14 **internet wires.”<sup>4</sup> Do you agree?**

15 A. No. Our roll-off trucks are lower than a delivery truck or box van; they sometimes  
16 drive under buildings and load off of loading docks. Ordinarily road rights-of-way  
17 require 14-foot clearance, and our roll-off trucks are under that height even with a  
18 40- or 50-yard drop box, let alone the smaller containers we use for the services  
19 ADE proposes. Occasionally customers’ overgrown trees make delivery a  
20 challenge. All of our drivers go through yearly training to deal with hazards like  
21 these.

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<sup>3</sup> Exh. ACD-4 at 10-21.

<sup>4</sup> Exh. ACD-1T at 4:21-22.

1

2 **Q. ADE's application also conflicts with Waste Management's services out of its**  
3 **Seattle and South Sound operations. How do the situations there compare?**

4 A. I'm obviously much more familiar with the operation I oversee, North Sound, and  
5 can't speak to specific details of those other operations. But I would expect  
6 everything I've said to apply to those units as well. I'm not aware of anything that  
7 would make me expect differently.

8

9 **Q. Does ADE's application demonstrate a need for service or improvements**  
10 **beyond the terms of Waste Management's existing tariff?**

11 A. No. As I have explained, Waste Management already offers virtually all of the solid  
12 waste options Mr. Douglas claims ADE will offer. Waste Management has the  
13 personnel and equipment to meet our service obligation far more consistently and  
14 efficiently over a large geographic area and customer base, and we've done that for  
15 many years with only very isolated problems.

16

17 **Q. Does this conclude your direct testimony?**

18 A. Yes.