

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSES TO DATA REQUESTS

DATE PREPARED: January 13, 2025 DOCKET: TG-240189 REQUESTER: Waste Management	WITNESS: Bridgit Feeser RESPONDER: Bridgit Feeser EMAIL: Bridgit.Feeser@utc.wa.gov
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DATA REQUEST NO. 28:

Refer to Feeser Rebuttal, Exh. BF-4T, at 5:8-14, claiming that Ms. Feeser “argue[s] throughout [her direct] testimony” that WMW “provided inadequate and unreasonable . . . service.” In this regard:

- a. Please cite by page and line each passage in Ms. Feeser’s direct testimony that provides evidence that WMW provided inadequate service in any respect other than the failure to serve in compliance with the tariff.
- b. Please cite by page and line each passage in Ms. Feeser’s direct testimony that provides evidence that WMW provided unreasonable service in any respect other than the failure to serve in compliance with the tariff.
- c. Please identify all other evidence known to Staff that tends to show that the service provided by WMW to the customers at issue in this case was inadequate or unreasonable in any respect other than the failure to serve in compliance with the tariff, and produce all relevant documents.

RESPONSE:

Objection. Not reasonably calculated to lead to the discovery of admissible evidence. Without waiving and subject to the stated objection, Staff responds as follows:

- a. Staff has not alleged that Waste Management has provided inadequate service in any other respect other than failure to provide service that complies with Tariff 14, Item 240. Failing to comply with the tariff is the nature and scope of the violations, which Waste Management has already conceded occurred.
- b. Staff has not alleged that Waste Management has provided unreasonable service in any other respect other than failure to provide service that complies with Tariff 14, Item 240. Failing to comply with the tariff is the nature and scope of the violations, which Waste Management has already conceded occurred.
- c. See response to section (a) and section (b). See also Staff’s Response to Waste Management Data Request No. 25.