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BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

WASTE MANAGEMENT OF  
WASHINGTON, INC. d/b/a WASTE  
MANGEMENT OF SPOKANE

Respondent.

DOCKET NO. TG-143889

STIPULATION REGARDING  
PRODUCTION OF CONFIDENTIAL  
WMW INFORMATION TO SPOKANE  
COUNTY'S EXPERT KEN GIMPEL

**I. INTRODUCTION**

1. The parties to this proceeding hereby enter into this Stipulation Regarding Production of WMW's Confidential Information to Spokane County's Expert Ken Gimpel in order to protect certain confidential information of Waste Management of Washington, Inc., d/b/a Waste Management of Spokane ("WMW").
2. Mr. Gimpel is currently the Assistant Utilities Division Director, Solid Waste/Fleet Services for the City of Spokane. Until October 2012, Mr. Gimpel was employed by WMW as the Municipal Relations Director for central and eastern Washington and Idaho.
3. On Friday, March 20, 2015, Spokane County disclosed that it has designated Mr. Gimpel as an expert in this proceeding.

- 1 4. WMW raised certain objections to Mr. Gimpel serving as an expert in this matter to Spokane  
2 County, including that he has a confidentiality agreement with WMW pursuant to his prior  
3 employment with WMW, that his current employer, the City of Spokane has a contract with  
4 WMW for processing city recyclable materials at WMW's Materials Recovery Facility  
5 ("MRF"), and that the City of Spokane competes with WMW for certain commercial  
6 recycling services.
- 7 5. Work papers submitted by WMW as part of its general rate request ("Work Papers") include  
8 valuable commercial information, including confidential cost and financial information,  
9 related to its commercial recycling operations, and its Spokane MRF operations. Due to  
10 WMW's concerns, Spokane County has agreed that Mr. Gimpel will not be permitted to  
11 review underlying financial analysis contained in the Work Papers related to WMW's  
12 commercial recycling operations or its Spokane MRF operations
- 13 6. As such, the parties agree that Mr. Gimpel will be provided with a separate redacted copy of  
14 WMW's work papers which exempts from view all underlying financial analysis related to  
15 WMW's commercial recycling operations and the operation of its Spokane MRF.
- 16 7. In addition, because the Commission Staffs' work papers are based on the information  
17 provided in WMW's Work Papers, any information produced to Spokane County by the  
18 WUTC during the course of this proceeding will also exempt from Mr. Gimpel's review all  
19 financial analysis and information related to WMW's commercial recycling operations and  
20 the operation of its Spokane MRF.
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## 24 II. STIPULATION

- 25 8. Pursuant to the stipulation of the parties and for the reasons stated above, the following  
26 materials will be redacted from the Work Papers that Ken Gimpel has permission to review:

- 1 A. "CM Recycle" – Operations Income Statement/Actuals and Budgets  
2 Comparison/Commercial RCY WTB: All information in this file relates to commercial  
3 recycling and is prohibited from review by Mr. Gimpel.
- 4 B. "Com'l FL Rec." – WM of Spokane – Report for Commercial Frontload Recycling  
5 (Report Dates 1/1/2013-12/31/2013): All information in this file relates to commercial  
6 recycling and is prohibited from review by Mr. Gimpel.
- 7 C. "Com'l Organics" – WM of Spokane – Report for Commercial Organics (Report Dates  
8 1/1/2013-12/31/2013): All information in this file relates to commercial recycling and is  
9 prohibited from review by Mr. Gimpel.
- 10 D. "MRF ROR Analysis" – WM of Spokane – MRF ROR Analysis: All information in this  
11 file relates to the SMaRT MRF and is prohibited from review by Mr. Gimpel.
- 12 E. "Roll Off Disposal (includes recycling disposal)" – WM of Spokane – Report for  
13 Rolloff (Report Dates 1/1/2013-12/31/2013): Redacted information in this file relates to  
14 commercial recyclable materials and is prohibited from review by Mr. Gimpel.
- 15 F. "Rolloff (includes roll off recycling)" – Operations Income Statement/Actuals and  
16 Budgets/Roll Off WTB: Redacted information in this file that relates to collection of  
17 commercial recyclable materials by roll off is prohibited from review by Mr. Gimpel.
- 18 G. "SMaRT Fixed Assets" – Net Book Value Detail/Business Unit 02968 – Spokane  
19 Material & Recycling T/Book FINANCIAL/As of Year 2013, Period 12: All information in  
20 this file relates to the SMaRT MRF and is prohibited from review by Mr. Gimpel.
- 21 H. "SMaRT Inc. Statement" – Operations Income Statement/Actuals and Prior Year  
22 Comparison/SMART Center MRF-02968: All information in this file relates to the SMaRT  
23 MRF and is prohibited from review by Mr. Gimpel.
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DATED this 31<sup>st</sup> day of March, 2015.

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