

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSES TO DATA REQUESTS

DATE PREPARED: November 20, 2024 DOCKET: TG-240189 REQUESTER: Waste Management	WITNESS: Bridgit Feeser RESPONDER: Bridgit Feeser TELEPHONE:
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DATA REQUEST NO. 9:

Does Staff believe monthly residential solid waste collection is inherently unreasonable? Please explain.

RESPONSE:

Objection. Irrelevant. Without waiving the objection, Staff provides the following response:

Staff involved in this investigation are not responsible for reviewing tariff proposals. Compliance Investigations Staffs' expertise and focus is on ensuring companies comply with laws, rules, and tariffs. Staff has no opinion on if monthly residential solid waste collection is inherently unreasonable.

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DATA REQUEST NO. 10:

Please admit that the Commission has often approved monthly residential garbage service, including under Item 100 of Tariff 14. If your response is anything other than an unqualified admission, please state what Staff believes the truth of the matter to be and produce all relevant documents.

RESPONSE:

Objection. Irrelevant, overly broad and burdensome, vague, seeks information that is publicly available. Without waiving the objection, Staff provides the following response:

Neither Item 100 of Tariff 14 nor whether the commission has approved monthly residential garbage service apply to this case. This case is about the Company not providing service to customers under Tariff 14, Item 240, permanent container pick-up service, which requires every other week pick-up service.

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DATA REQUEST NO. 11:

Please admit that the Commission's standard solid waste tariff, posted on its website, provides for monthly residential garbage service under Item 100. If your response is anything other than an unqualified admission, please state what Staff believes the truth of the matter to be and produce all relevant documents.

RESPONSE:

Objection. Irrelevant and seeks information that is publicly available. Without waiving the objection, Staff provides the following response:

Item 100 does not apply to this case. This case is about the Company not providing service to customers under Tariff 14, Item 240, permanent container pick-up service, which requires every other week pick-up service.

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DATA REQUEST NO. 12:

Please identify any case where Staff has opposed a proposed monthly solid waste collection service frequency.

RESPONSE:

Objection. Irrelevant, overly broad and burdensome, vague, seeks information that is publicly available. Without waiving the objection, Staff provides the following response:

This case is about the Company not providing service to customers under Tariff 14, Item 240, permanent container pick-up service, which requires every other week pick-up service. This case has nothing to do with whether staff has opposed a proposed monthly solid waste collection service frequency.

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DATA REQUEST NO. 13:

Please identify any case where the Commission has rejected a proposed monthly solid waste collection service frequency.

RESPONSE:

Objection. Irrelevant, overly broad and burdensome, vague, seeks information that is publicly available. Without waiving the objection, Staff provides the following response:

This case is about the Company not providing service to customers under Tariff 14, Item 240, permanent container pick-up service, which requires every other week pick-up service. This case has nothing to do with whether the Commission has rejected a proposed monthly solid waste collection service frequency.

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DATA REQUEST NO. 14:

Please explain any reason Staff believes monthly service might be reasonable for residential garbage collection under Item 100 but not under Item 240.

RESPONSE:

Objection. Irrelevant, overly broad and burdensome, vague. Without waiving the objection, Staff provides the following response:

This case is about the Company not providing service to customers under Tariff 14, Item 240, permanent container pick-up service, which requires every other week pick-up service. This case has nothing to do with Item 100, which speaks for itself. Compliance Investigations Staffs' expertise and focus is on ensuring companies comply with laws, rules, and tariffs. Staff has no opinion on if monthly service might be reasonable for residential garbage collection under Item 240.