

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:
--	--

DATA REQUEST NO. 21:

Feeser testifies (Exh. BF-1T at 16:20-17:2) that “While this investigation focuses on Tariff 14, Item 240, Douglas County, Staff believes the non-compliance could be spread across the Company’s entire service area and without Commission intervention, the Company’s practices could continue.” In this regard:

- a. Please describe all evidence known to Staff in support of the stated belief.
- b. Please produce all relevant documents.
- c. Please describe any investigation by Staff to substantiate the stated belief.
- d. Please admit that Staff undertook no investigation of this factor in support of its recommended penalty. 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:

See Staff Response to Public Counsel Data Request No. 3.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSES TO DATA REQUEST

DATE PREPARED: November 13, 2024 DOCKET: TG-240189 REQUESTER: Public Counsel WITNESS: Glenn A. Watkins RESPONDER: Glenn A. Watkins TELEPHONE:	WITNESS: Bridgit Feeser RESPONDER: Bridgit Feeser TELEPHONE: (360) 664-1111
--	---

DATA REQUEST NO. 3:

Please provide any support Staff may have for the statement that “it is likely that Waste Management is also withholding ever-other-week pick-up service to customers with permanent containers covered by Item 240 in other Company tariffs, resulting in more than 25 customers being affected.”

RESPONSE:

Douglas County is not the only rural county that Waste Management of Washington (Waste Management) serves. For example, other rural counties that Waste Management serves are Kittitas, Grant, Benton, Chelan, and others. Staff believes that it is likely that Waste Management could be treating customers in similar situations the same as those in Douglas County.

Because Douglas County was the focus of Staff’s investigation, Staff does not have documentation showing that there are issues in the other rural counties served by Waste Management. However, Staff is recommending that the company audit its compliance with Item 240 service frequency state-wide, including all routes to which Item 240 applies, as a condition for suspended penalties.