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EXHIBIT RM-1T
DOCKET: TG-200083
RIDWELL INC.
WITNESS: RYAN METZGER

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF DETERMINING THE
PROPERTY CARRIER CLASSIFICATION
OF:
RIDWELL, INC.

No. TG-200083

DIRECT TESTIMONY OF
RYAN METZGER
ON BEHALF OF RIDWELL, INC.

May 5, 2020

RIDWELL, INC.
DIRECT TESTIMONY OF
RYAN METZGER

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	RIDWELL’S BUSINESS.....	3
A.	Overview	3
B.	Difference Between Ridwell and a “Solid Waste Company”	7
C.	Vehicles.....	11
D.	Items Picked Up and Transported.....	12
E.	Ridwell’s Facilities	26
III.	LOCAL SOLID WASTE MANAGEMENT PLANS	27
IV.	IMPACT OF RIDWELL’S OPERATION ON THE WASTE STREAM.....	30
V.	IMPACT OF RIDWELL ON EXISTING SOLID WASTE CARRIERS	31
VI.	REACTION OF CUSTOMERS AND THE COMMUNITY TO RIDWELL’S OPERATIONS	32
VII.	INTERACTIONS WITH COMMISSION STAFF.....	35
VIII.	PRACTICAL IMPLICATIONS OF BEING REGULATED AS A SOLID WASTE COMPANY	36

1 I. INTRODUCTION

2
3 **Q. Please state your name and position.**

4 A. My name is Ryan Metzger. I am the CEO and co-founder of Ridwell, Inc.

5
6 **Q. When did you found Ridwell?**

7 A. July 30, 2018

8
9 **Q. Please describe briefly what you did professionally before founding Ridwell.**

10 A. Prior to Ridwell, I worked at several companies selling to consumers such as Zulily
11 and Blue Nile, and also worked at Microsoft. Immediately before founding Ridwell, I
12 worked at a local investment firm where I advised companies on their marketing
13 strategies. I received an MBA from the Kellogg School of Management at
14 Northwestern University.

15
16 **Q. What led you to found Ridwell?**

17 A. My family has always valued sustainability and helping our community. My son
18 Owen and I had a project called "Owen's List" where we researched places that you
19 could donate your old stuff so it would be recycled or reused. These were all
20 categories not accepted in Seattle's single-stream recycling. We wanted to act on what
21 we found and, since some partners (like NW Lions Eyeglass Recycling Center outside
22 Olympia) were 30 or more minutes away from where we live, and we had extra space
23 in our car, we offered to take neighbors' stuff along with our own. We would tell
24 people what category we were picking up on a social media post and people would
25 leave it out on their porch for us to pick it up.

1 The community responded in a big way by participating in our pickups, by giving us
2 ideas for more categories, and by telling others about our project. Within a few
3 months, 4,500 people had signed up to hear about our pickups and we had done over
4 1,200 of them across more than 20 categories of materials. Here are some links to
5 some news stories of our early efforts:
6

- 7 • <http://www.seattleschild.com/This-Seattle-6-year-old-is-so-good-at-recycling-he-helps-other-people/>
- 8 • <https://www.king5.com/article/news/local/father-and-son-turn-recycling-into-a-neighborhood-event/281-510300741>
- 9 • <https://www.myballard.com/2018/01/10/family-starts-owens-list-to-pick-up-recyclable-items-from-neighbors/>

10 We received such an encouraging response to the need that we were filling that a few
11 friends and I brainstormed how we might offer a similar service at a greater scale. As
12 we learned more about how single-stream recycling works, and some challenges
13 facing it, we also wanted to create a system that complemented existing efforts by
14 removing contaminants. Our intention was always to offer reuse and recycling
15 categories not offered by local jurisdictions, and that is how we designed Ridwell to
16 operate. We know that not everyone will be interested in using our service, but for
17 those who are environmentally-conscious, and lack the time to take all of these trips
18 on their own, we wanted to make it easier for them to reuse and recycle more.
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1 **II. RIDWELL'S BUSINESS**

2 **A. Overview**

3 **Q. Please describe Ridwell's business**

4 A. Essentially, provides its customers with the opportunity to find new uses for materials
5 in their homes that they want to get rid of. It provides an alternative to the customers
6 making trips to various donation centers or recycling operations. Our company's
7 vision and mission, and values describes the focus of our business:
8

9 **Vision**

10 Empowering communities to build a less wasteful future

11 **Mission**

- 12
- 13 1. Make it simple to get rid of stuff responsibly
 - 14 2. Discover and enable new options for old or unused things
 - 15 3. Support responsible consumption

16 **Values**

17 Empathy, Integrity, Trust, Resourcefulness, Accountability, Aspirational

18 In a word, what we do is facilitate "upcycling" for our customers.

19

20 **Q. How do you collect the "stuff" that your customers seek to get rid of responsibly?**

21 A. Ridwell offers customers a chance to schedule a pickup every two weeks. We provide
22 bags so they can source-separate and a bin for them to place the bags. Bins are
23 ordinarily placed on a customer's porch, but may also be at the side of the house.
24 They are not placed on the curb or anywhere near it. Customers get an email or a text
25 message asking them if they would like us to pick up from them along with a
26
27
28

1 description of what we plan to pick up. If they say “yes,” we send a van or car to pick
2 up their materials.
3

4
5 Unlike refuse and recycling companies that work in the various jurisdictions, we do
6 not run on a route or any established or a pre-selected course of travel. Though we
7 only pick up on certain days of the week in a given area, we are “on call” for those
8 days and only pick up when asked. That means that the 40-50 stops that a driver has
9 each day is completely different from when the driver was in the same area a few
10 weeks prior. We are not picking up from every home on a block and instead may
11 travel far distances between people who requested a stop that day.
12

13
14
15 We do not perform any of the actual recycling or reuse of what we pick up, but instead
16 collect from local families and provide their material to local partners.
17

18 **Q. How many people do you employ?**

19 A. We employ 13 people. Depending on the workload, we also employ 10-15 contractors
20 who handle some of the pickups.
21

22
23 **Q. How do you choose your employees?**

24 A. We conduct interviews of potential employees, who also undergo background checks
25 and checks on their driving records. We are proud of our safety record and that our
26 employee retention has been extremely high. We get applications often from people
27
28

1 wanting to work for Ridwell given how much enthusiasm there is in our community
2 for our mission to make it easy for people to waste less and help local communities.
3
4

5 **Q. How many customers do you have?**

6 A. We have over 7,000 active customers as of May 1, 2020.

7 **Q. Please describe how your business has grown.**

8 A. In our first month of service in October 2018, we had 99 customers. We have grown
9 in each month and had our largest growth in January 2020, as King County residents
10 learned that they could no longer put plastic bags in their recycling bins. During that
11 period, over 1,000 families were searching for an alternative means of recycling
12 plastic film and decided to sign up for Ridwell rather than seek out a grocery store that
13 might have a plastic film collection bin.
14
15

16
17 **Q. Do you operate in a given territory?**

18 A. No, not really. We operate where we have a sufficient number of customers to make it
19 worthwhile. So far, we have limited our business to portions of King and Snohomish
20 Counties where there has been enough people expressing interest by signing up with
21 their email address and zip code.
22
23

24 **Q. Where do you do business in those counties?**

25 A. As of April 1, 2020, we do business in 33 zip codes. In King County, we do business
26 in the cities of Seattle, Shoreline, Mercer Island, Kirkland, Lake Forest Park,
27
28

1 Kenmore, Redmond, and a very small part of Burien. In Snohomish County, we do
2 business in Edmonds, Woodway, and Mountlake Terrace.

3
4 We have received considerable demand for our service in cities outside of the above.
5
6 Once there are enough people to serve a community, we begin service there but only
7 after verifying that nothing we take could be reused or recycled through what is
8 provided by local jurisdictions. Cities closest to receiving service include Bellevue,
9 Woodinville, Renton, Sammamish, Issaquah, and Bothell in King County and
10 Lynnwood, and Brier in Snohomish County.

11
12
13 **Q. Do you have plans to expand to other areas?**

14 A. We have received interest from potential customers and partners in a number of
15 places, across the country. Just in the last few months, we have had people reach out
16 from Portland, Oregon, Boston, Massachusetts, West Virginia, and Cleveland, Ohio.
17 We also visited with community groups and a government official in Boise, Idaho,
18 who were interested in helping us expand there, while we were on vacation last
19 summer. We know that there is substantial demand for the services we offer in many
20 places. However, right now, any plans are on hold while the country, and our
21 business, works through the current public health crisis.
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1
2 **B. Difference Between Ridwell and a “Solid Waste Company”**

3 **Q. Do you consider yourself a “solid waste company.”**

4 A. No, for several reasons. First, we pick up and transport no garbage or refuse. While I
5 understand that recyclables are included in the definition of “solid waste,” and that we
6 pick up some items that may be considered recyclable, that is not the focus of our
7 business. Second, we do not hold ourselves out as a solid waste company; we have a
8 different focus.
9

10
11 **Q. What is that focus?**

12 A. As I said earlier, the focus of our business is helping residents of Washington live
13 more sustainably by helping them re-distribute items of value that they are not using to
14 others in the community. Whenever possible, this takes the form of local reuse as we
15 spend considerable time locating local non-profits who have specific needs that could
16 be served by what may be sitting idle in people’s homes. This could be eyeglasses,
17 could be non-perishable food or Halloween candy, or could be winter coats. When
18 there is not a reuse option available, we look for specialized recyclers who are not
19 accessible through city-provided services, but who are located nearby and available if
20 people handled the transportation on their own. Making this whole system possible, is
21 technology we have created to stay in close contact with our members so we can
22 answer their questions and they can request a pick-up.
23
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1 **Q. Are there any other differences between Ridwell and a traditional solid waste**
2 **company?**

3
4 A. Let me refer to Exh. RM-02, which was prepared under my supervision. It shows the
5 various types of entities that transport solid waste and compares them to what we do at
6 Ridwell. The left-hand column shows traditional haulers. They pick up at curbside,
7 operate over a fixed route and provide a monopoly service to all customers within
8 their territory. They pick up refuse and garbage and also pick up *some* recyclables
9 (those required to be picked up by the local Solid Waste Management Plan) usually on
10 alternate weeks. They take garbage and refuse to the landfill or transfer station and
11 take recyclables to a Materials Recycling Facility (MRF). These haulers also
12 generally will pick up extra bags of garbage, for an extra charge, and also will deliver
13 and pick up drop boxes for larger amounts of garbage or debris, and again for an extra
14 charge. These companies are fully regulated by the UTC or through an exclusive
15 contract with a city.
16
17

18
19 The next column shows a “junk hauler.” Such companies, such as 1-800-GOT-JUNK
20 pick up garbage and refuse on request, generally in large trucks. They pick it up from
21 the home, garage, or yard, wherever the customer indicates. They take the materials to
22 the transfer station and landfill, and, on occasion, to an MRF. (However, as I
23 understand it, there is no separation by the customer of recyclables. At least none is
24 required.) Even though junk haulers “compete” with the traditional solid waste carriers
25 for refuse and garbage, the UTC does not regulate them as solid waste carriers. The
26
27
28

1 UTC Staff considers them to be “private carriers” and exempt from such regulation,
2 even regulation as a common carrier. As described below, this regulatory vacuum for
3 junk haulers has raised some concerns with the traditional haulers. The Commission
4 Staff has indicated that it deems the junk haulers to be providing a “clean out” service,
5 and hauling the materials to a landfill is “incidental” to that business. Therefore, junk
6 haulers can escape regulation as private carrier.
7

8
9
10 Let me jump to the column on the far right. That describes a self-hauler. These are
11 individuals who take loads to the landfill or transfer station and also take materials to
12 recycling drop-off points or, where appropriate, to donation centers that will accept the
13 items for reuse, or for processing into reusable items. This is something my family did
14 often and the time and effort it took to do this is what inspired us to create Ridwell.
15

16
17 Returning to the third column from the left, that describes Ridwell’s operations. At
18 the request of our customers, we pick at the materials on the customer’s porch, on the
19 side of the house, or occasionally in their backyard. We deliver the materials to one of
20 about 30 reuse or specialized recycling partners. Unlike the junk haulers, Ridwell does
21 not compete with the traditional haulers for garbage or recyclables.
22

23
24 **Q. Regarding junk haulers, what is the source of your information?**

25
26 A. Much of my information comes from personal knowledge. I have not used a junk
27 hauler myself but have spoken with people who operate that type of business. In
28

1 addition, we asked the Commission for information about 1-800-GOT-JUNK and
2 other junk haulers in public records requests and sent data requests to Commission
3 Staff.
4

5
6 Filed as Exh. RM-03 is the response to Ridwell's DR 2, along with two common
7 carrier permits to affiliates of 1-800-GOT-JUNK for transportation of commodities.

8 Filed as Exh. RM-04 is the narrative UTC Response to Ridwell Public Records
9 Request. That response references a number of documents in "GovQA responsive
10 documents." We are filing the following of those documents:
11

- 12
13 • Exh. RM-05 is a copy of a letter dated Aug. 22, 2011, from Commission Staff
14 to Happy Hauler setting forth the reasons why the Commission Staff does not
15 deem Happy Hauler a solid waste company under RCW 81.77.
16
- 17 • Exh. RM-06 is a chart labeled "Common Carrier, Solid Waste Collection
18 Company, and Private Carrier" dated June 2011 that was provided in response
19 to our public request asking for documents explaining why junk hauler are not
20 regulated by the Commission.
21
- 22 • Exh. RM-07 is a letter dated March 17, 2011 from Commission Staff to a
23 representative of 1-800-GOT-JUNK asking why that company should not be
24 required to obtain a solid waste certificate when it appears to be advertising for
25 solid waste collection services.
26
27
28

- 1 • Filed as Exh. RM-08 is a certification from 1-800-GOT-JUNK dated February
- 2 1, 2013, indicating that it is “engaged in the solid waste collection business”
- 3 for purpose of the solid waste collection tax.
- 4
- 5 • Filed as Exh. RM-09 is an early 2013 email chain between Brad Lovaas, head
- 6 of the Washington Refuse and Recycling Association (WRRA) and
- 7 Commission Staff regarding 1-800-GOT-JUNK’s regulatory status.
- 8
- 9 • Filed as Exhs. RM-10, and RM-11 are common carrier permits for Northwest
- 10 Rubbish Removal, Inc., and Busby Junk Removal LLC.
- 11
- 12 • Filed as Exh. RM-12 is a households and general commodities permit for
- 13 South Sound College Hunks, LLC.
- 14

15 **C. Vehicles**

16 **Q. In what types of vehicles are the goods transported?**

17 A. We use both passenger cars and a cargo van. The cargo van is typically used when a
18 customer has an add-on that takes up more space. The majority of our pickups are
19 small in volume and a standard passenger typically will fit materials from 40 stops in
20 their vehicle. We run background checks on the drivers and also perform visual safety
21 inspections on the vehicles prior to them performing work for us. None of our vehicles
22 are large enough to require a CDL, so it would be impossible for us to provide a
23 service that collected garbage or even single-stream recycling.
24
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1 **D. Items Picked Up and Transported**

2 **Q. What items do you pick up from your customers?**

3 A. We pick up four categories of items on an ongoing basis: clothing/shoes, batteries,
4 light bulbs, and plastic film. The fifth category rotates. Popular rotating categories
5 have been: eyeglasses, wine corks, backpacks, calculators and small kitchenware.
6

7
8 Based on customer requests, we have also added add-on categories that are larger than
9 what will fit in a Ridwell bin, but small enough to still fit in a cargo van. These are
10 also reuse or specialty recycling items that would otherwise require a customer to self-
11 haul their own material. An example of an add-on would be car seats where we had
12 both a reuse and recycling partner, depending on the condition of the car seat someone
13 wanted to donate.
14

15
16 We consider our service an alternative to self-hauling for people who wish to reuse
17 and recycle above and beyond ways that are offered by their local jurisdictions or by
18 carriers with certificates from the Utilities and Transportation Commission. Some
19 customers also might have used a service like TerraCycle, where they mail in products
20 to be recycled that are not a part of traditional recycling collection. In both cases, our
21 method reduces the transportation required to utilize this type of reuse or recycling,
22 and makes the services accessible to more of the population in the areas we serve.
23
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1 **Q. When you say “plastic film,” do you mean to include plastic bottles and other**
2 **plastic containers?**

3
4 A. No. Plastic bottles and many plastic containers generally are picked up by solid waste
5 carriers as part of the recycling programs. These types are more rigid and work better
6 in single-stream recycling. We only pick up “plastic film,” which includes plastic
7 bags, bubble wrap, grocery and newspaper bags, dry cleaning bags, produce bags,
8 plastic wrap, and six pack rings. These types of items are not picked up by solid waste
9 collection companies. We learned how much trouble this category causes local
10 material recovery facilities as the film jams the machinery and is often mistaken for
11 paper. Most cities in Washington have been telling people not to recycle plastic, and
12 in October 2019, this was made official by a joint announcement by Seattle and King
13 County (link here -> [https://www.seattletimes.com/seattle-news/seattle-king-county-](https://www.seattletimes.com/seattle-news/seattle-king-county-to-stop-taking-plastic-bags-in-recycling/)
14 [to-stop-taking-plastic-bags-in-recycling/](https://www.seattletimes.com/seattle-news/seattle-king-county-to-stop-taking-plastic-bags-in-recycling/))
15
16
17

18 **Q. Please describe each of the four core categories of items and state how each is**
19 **handled.**

20
21 A. Clothing/shoes

22 Clothing and shoes arrive in the cotton bags we provide. We then empty them and
23 place clothing and shoes from multiple customers together in much larger plastic bags.
24 We then work with partners who are members of the King County “Threadcycling”
25 Program and have been in consultation with the leader of the Program. They provide
26 storage containers to us and come by once per week to pick up the clothing and shoes
27
28

1 that we have collected. The higher quality stuff is sold in their local thrift stores. They
2 have an outlet channel beyond that, as well as overseas buyers of both reusable and
3 recyclable clothing and shoes.
4

5
6 Plastic film

7 Plastic film arrives to us in the cotton bags we provide. We provide a secondary
8 screening and filter out a small portion that is either garbage (such as manila bubble-
9 lined Amazon mailers) or appropriate for curbside recycling (such as harder plastics
10 that we put in our office recycling bin serviced by Recology). Over 98% of the plastic
11 film we collect is film that can be recycled through our partners, but not through
12 curbside collection.
13

14
15
16 We have worked with different partners as we have grown to recycle the plastic film.
17 Some common destinations for plastic film are composite decking material, garbage
18 can liners, or e-commerce packaging. Originally we aggregated all of our screened
19 plastic film into large garbage bags that eventually reached partners, but starting in
20 April 2020, we have a new warehouse and are now baling and storing plastic film.
21

22 We are thrilled to partner with the Recycling Partnership on a grant for a baler as part
23 of their efforts to provide greater accessibility to plastic film that is no longer offered
24 as part of curbside collection in Seattle and King County.
25
26
27
28

1 Batteries

2 Household batteries arrive to us in the cotton bags we provide. We empty the bags into
3 buckets and place a lid over the bucket when it is not being filled. We do not accept
4 lead acid batteries as the majority are alkaline. We transport the buckets to All Battery
5 Sales & Service in Everett who sorts them and then works with downstream recycling
6 partners. We have worked with the local health department to ensure we manage this
7 category safely and are fully compliant with their regulatory practices.
8
9

10
11 Light bulbs

12 Light bulbs arrive to us in the cotton bags we provide. We empty the bags, being
13 careful that none break while the bags are being emptied. We post clear signage so our
14 employees know what to do should light bulbs be broken during this process. We
15 accept household bulbs (not tubes) that are incandescent, CFL, Halogen, or LED. We
16 do not accept fluorescent tube lights. Bulbs are placed in boxes that we seal shut, and
17 once full, deliver them to Eco Lights Northwest for processing. We have worked with
18 the Seattle and King County Department of Public Health to ensure we manage this
19 category safely and are fully compliant with their regulatory practices.
20
21
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1 **Q. Does the local solid waste company pick up any of this material as part of its**
2 **recycling program?**

3
4 A. When we began operating, none of the jurisdictions where we operated picked up any
5 of these materials. In April 2019, the City of Seattle began offering a “Special
6 Collection” service that has some overlap in the material we collect.

7 <https://www.seattle.gov/utilities/services/garbage/garbage-at-home/special-collection>
8

9
10 Household batteries have the most overlap as customers can either include that as part
11 of their Ridwell pick, or pay \$5 and schedule a pickup with Seattle Public Utilities
12 (SPU) for a few of the battery types we accept. SPU also has special pickups for CFL
13 bulbs and Styrofoam blocks. We pick up several kinds of light bulbs, not just CFLs
14 and four types of Styrofoam, not just blocks. And SPU takes “broken and obsolete”
15 electronics; we take those plus working electronics.
16

17
18 We have not had any pushback from SPU because of these minor overlaps in service.
19 Indeed, I note that the Investigation Report that gave rise to this proceeding notes this
20 overlap and states that “SPU does not plan to address the issue with Ridwell, as the
21 residents typically have solid waste and recycling from a contracted provider” We are
22 not aware of any other cities that pick up any other materials for recycling and monitor
23 closely what is offered to ensure this does not happen.
24
25
26
27
28

1 **Q. What companies collect solid waste in Seattle?**

2 A. Recology and Waste Management
3
4

5 **Q. Do you transport anything to a landfill or transfer station?**

6 A. The only material from us that goes out to transfer stations is the incidental amount of
7 non-recyclable material that arrives to us in the plastic film bags when customers give
8 us something we cannot accept. We screen all the bags that arrive and set aside
9 material that is not recyclable. Material screened out is very infrequent and in 2019 we
10 estimated this to be less than One Percent (1%) of the total weight that we distributed
11 to reuse and recycling partners. In general we put this out for collection by our local
12 solid waste company. However, in a few occasions we have taken small loads to the
13 transfer station. It would be more cost-effective to send categories like batteries and
14 non-CFL light bulbs to a landfill (as cities often suggest its customers to do), but we
15 instead provide them to partners who will recycle them.
16
17
18
19

20 **Q. You mentioned that in addition to the four regular categories of material you**
21 **pick up, you have other categories that “rotate.” Please describe those and state**
22 **how each is handled.**

23 A. For 2019 and 2020, we have picked up the following:
24 Back to School backpacks, alarm clocks, and calculators
25
26
27
28

1 These were collected from Ridwell bins, aggregated, and then dropped off to partner
2 that provides goods and services to homeless youth. These three categories were listed
3 under 'most needed items' during the time when we provided these materials to them.
4

5
6 Non-perishable food

7 These were collected from Ridwell bins and were aggregated by the neighborhood in
8 which our customers live. Ballard customers, for example, had any food they provided
9 taken to the Ballard Food Bank. We worked with eight local food banks in ways
10 where our members were supporting people in closest proximity to them.
11

12
13 Eyeglasses

14 These were collected from Ridwell bins and then dropped off to NW Lions Eyeglass
15 Recycling Center outside Olympia. We toured their facility where volunteers clean
16 and sort eyeglasses and send usable ones to developing countries without access to
17 vision care. Any glasses that are broken or unusable, are recycled and some of the
18 proceeds are used to fund their operating costs.
19
20

21
22 Books

23 These were collected from Ridwell bins and were dropped off to the Friends of the
24 Seattle Public Library. From there, the books that fill a need were placed into our local
25 library system. Others were sold where the proceeds monetarily supported the library
26 system.
27
28

1 Hats, Scarfs, Gloves

2 These were collected from Ridwell bins and were either dropped off one of several
3 partners. We chose a partner for particular sets based on whether they were for
4 children or adults and based on where the customers lived.
5

6
7 Halloween candy

8 These were collected from Ridwell bins and were brought to Birthday Dreams. This
9 organization offers hope to homeless youth by providing a birthday party and uses the
10 candy it collects to assemble party favors for attendees.
11

12
13 Kids' Pajamas

14 These were collected from Ridwell bins and were brought to a partner that distributes
15 them to local low income babies and children.
16

17
18 Women's Dress Clothes

19 These were collected from Ridwell bins and were brought to a partner that provides
20 dress clothing for low income women to wear during interviews and during their
21 employment.
22

23
24 Travel size toiletries

25 These were collected from Ridwell bins and were brought to a partner that provides
26 support to women experiencing homelessness
27
28

1 Stuffed Animals/Legos/Action Figures

2 These were collected from Ridwell bins and were brought to the YMCA who used
3 them to support their Foster Care Program.
4

5
6 Food takeout utensils

7 These were collected from Ridwell bins and were brought to a partner that distributed
8 them along with food to local homeless and low income residents of the downtown
9 area.
10

11
12 Jewelry

13 These were collected from Ridwell bins and were brought to a partner that refurbishes
14 and sells jewelry and reclaimed metals, and uses the proceeds to be able to provide
15 grants to local women's shelters. During the most recent Ridwell drive, our partner
16 estimated we brought them enough jewelry to support \$25k in grants to local women's
17 shelters.
18

19
20
21 Loose and unused diapers

22 These were collected from Ridwell bins and were brought to a partner that provides
23 gear, clothing, and other support to low income parents.
24

1 Small kitchenware

2 These were collected from Ridwell bins and were brought to ReWA (Refugee
3 Women’s Alliance) a partner that distributed them to the refugee population it
4 supports.
5

6
7 Metal Bottle Caps and Pouch Tops

8 These were collected from Ridwell bins and were provided to two local artists
9 affiliated with a local arts festival. Both artists used these items to create upcycled
10 works of art.
11

12
13 Pet supplies and pet toys

14 These were collected from Ridwell bins and were provided to two local organizations
15 that support rescue pets and low-income pet parents.
16
17

18 Brassieres

19 These were collected from Ridwell bins and were provided to an organization that
20 supports women’s empowerment in developing countries by providing bras that can be
21 sold in local markets. This helps women become financially independent.
22
23

24 Bedding, linens, and towels

25 These were collected from Ridwell bins and were provided to a partner that uses
26 bedding, linens, and towels to comfort wild animals they rescue and try to save.
27
28

1 Planter pots

2 These were collected from Ridwell bins and were provided to a partner who reused
3 them when planting new material to be sold in their stores.
4

5
6 Wine Corks

7 These were collected from Ridwell bins and were distributed to several partners with
8 different uses. Some went to local residents who used corks to create artwork and
9 landscaping. Others went to partner that grinds the corks down to create new products
10 like parts of shoes.
11

12
13 Small electronics

14 These included such things as cords, chargers, and small portable devices like tablets
15 or cell phones. These were collected from Ridwell bins and provided to partners who
16 are certified electronics recyclers with the state of Washington.
17

18
19 Maternity clothes, pads and diapers

20 These were collected from Ridwell bins and were provided to a partner that provides
21 community-based support during pregnancy, birth, and early parenting.
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1 Fabric Scraps

2 These were collected from Ridwell bins and were provided to a partner, which is a
3 local mother and daughter project that sews them into reusable bags they sell and
4 donate at farmer's markets.
5

6
7 Toys

8 These were collected from Ridwell bins and were provided to Birthday Dreams. This
9 pickup happened after the 2019 holiday season and the toys collected will be
10 distributed to children experiencing homelessness on their birthdays.
11

12
13 As is obvious from this listing, during the course of a year, we provide Ridwell
14 customers with many more categories that are donated and reused within their
15 communities compared to what is sent to a specialized recycler. Our customers prefer
16 their items are reused, so wherever there is a partner who can do that, we will choose
17 that route over one who will recycle.
18
19

20
21 **Q. Do any of the items you pick up pose any risk to human health or the**
22 **environment or contain harmful substances?**

23 A. No. The only materials that arguably could pose such a risk is CFL bulbs. However,
24 we have worked with the Seattle and King County Departments of Public Health and
25 have received assurances that our procedures are not posing a risk. We intentionally
26 shy away from things like lead acid batteries, oil-based paints, or hazardous chemicals,
27
28

1 despite the frequent demands for us to make it easier for our customers to responsibly
2 dispose of them.
3

4
5 **Q. Do you every have some emergent community needs that you try to meet with**
6 **your special pickups?**

7 A. Yes, definitely. The spread of the Coronavirus has caused shortages of many
8 commodities, and those shortages have impacted many people. Once we learned how
9 many people might suffer, we reached out to our partners to see what they needed
10 most that may be sitting around not being used in our member's homes.
11

12
13 We learned there were many emerging needs so, on two Saturdays in March, we
14 collected hygiene items (such as toilet paper and hand sanitizer) and pet food for
15 organizations like Mary's Place, Pike Market Food Bank, and the Seattle Humane
16 Society. This pickup was offered to members free of charge and resulted in donations
17 that filled up our cargo van five times. During April after learning of a food shortage
18 from Governor Inslee, we added non-perishable food as a category and will deliver
19 over 15,000 lbs. of food to Northwest Harvest and Rainier Valley Food Bank. We are
20 continuing to monitor the situation and expect the suffering to continue and possibly
21 get worse. Our platform is flexible and our members are generous with what they give,
22 so we expect to contribute to our community again like this in the weeks and months
23 ahead.
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1 **Q You mentioned “partners.” How did you find these?**

2
3 A. It was a long process, with the result being a proprietary list the use of which
4 facilitates our operations. While some of our partners are obvious, such Goodwill for
5 used clothing, others are not. Filed as Exh. RM-13(HC) is a highly confidential list of
6 those partners and the categories of goods transported to them.
7

8
9 **Q. You also mentioned “add-on” pickups. What are those?**

10 A. Add-on categories are larger categories than what will fit in a Ridwell bin that
11 customers can select each pickup for an additional cost. These are also reuse or
12 specialty recycling and would otherwise require a customer to self-haul their own
13 material. Again, an example of an add-on is car seats where we had both a reuse and
14 recycling partner, depending on the condition of the car seat someone wanted to
15 donate . Like our other categories, no add-on categories consist of materials available
16 to the local curbside recycling services.
17
18

19
20 **Q. In any of the jurisdictions in which you operate, does the certificated solid waste**
21 **carrier pick up any of these items?**

22 A. Solid waste carriers do pick up some materials in that we pick up, but they do not
23 transport them for reuse or recycling as we do. They simply take them to transfer
24 stations (and ultimately landfills). The one exception are special pickups in Seattle
25 noted above.
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1 **E. Ridwell's Facilities**

2 **Q. Please describe any facilities that Ridwell has and what they are used for.**

3 We have a facility that is currently located at 1920 Occidental Ave. S. in Seattle. It
4 was previously located at 312 W. Republican St. In either case, this is where drivers
5 drop off bagged materials that they have picked up from customers' Ridwell bins. All
6 bags are labeled, so when a driver arrives, he or she unloads their vehicle and places
7 sets of bags together with others from that category. Next, a member of the Ridwell
8 operations team empties bags of like categories together into larger storage materials
9 (such as a large garbage bag full of clothing and shoes destined for Goodwill). Larger
10 storage bags are then stored on shelves in our facility until they are provided to a
11 partner. The final delivery is sometimes done by a partner who may have their own
12 truck and other times it is handled by Ridwell.

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17 At both locations, we have been in close contact with the King County Department of
18 Public Health to ensure we are in compliance with their regulations. This has involved
19 us providing detailed information on destinations for materials and site visits to more
20 thoroughly inspect our facility from a health and safety perspective. We are in good
21 standing with the Department of Health as demonstrated by the permit exemptions that
22 we have received for both locations. Filed as Exhs. RM-14 and RM-15 are copies of
23 those documents. Pursuant to our standard practices, and consistent with the
24 requirements of the Department of Public Health, the material we collect is handled
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1 and stored in a manner that does not present a risk to human health or the
2 environment.
3

4 III. LOCAL SOLID WASTE MANAGEMENT PLANS

5
6
7 **Q. Have you reviewed the King County Solid Waste Management Plan?**

- 8
9 • A. Yes. As I mentioned earlier, our service is focused on providing more accessible
10 specialty recycling and reuse and as such we consult the ‘where does it go’ flyers to make
11 sure nothing we collect is identified as being recyclable. Here are links to Seattle’s Guide
12 (<https://www.seattle.gov/Documents/Departments/SPU/Services/Recycling/EnglishRecycl>
13 [ingdodont.pdf](https://www.seattle.gov/Documents/Departments/SPU/Services/Recycling/EnglishRecyclingdodont.pdf)) and to that of Mercer Island ([https://41k4p01v6nzc13r4y42jb9xv-
14 wpengine.netdna-ssl.com/wp-content/uploads/2019/10/Recycle-Poster-Updated-
15 10.24.2019.pdf](https://41k4p01v6nzc13r4y42jb9xv-wpengine.netdna-ssl.com/wp-content/uploads/2019/10/Recycle-Poster-Updated-10.24.2019.pdf))
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17
18

19 And I have talked with King County officials to make sure that Ridwell’s operation is
20 consistent with that Plan. On October 18, 2019, I spoke with Jeff Gaisford, the
21 Recycling and Environmental Services Section Manager at King County, about the
22 King County Solid Waste Management Plan and he told me that he believed the Plan
23 was designed in a way that encouraged a service like ours to exist.
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27 **Q. What materials does the King County Plan designate as recyclable?**
28

1 A. Table 4-2 of the King County Plan lists “designated recyclables.”

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Category	Includes
Carpet and Pad	Carpet and pad remnants.
Clean Wood	Unpainted and untreated wood, including wood from construction and demolition projects, and pallets.
Construction and Demolition Debris	Recyclable and non-recyclable materials that result from construction, remodeling, repair or demolition of buildings, roads, or other structures and requires removal from the site of construction or demolition. Construction and demolition debris does not include land clearing materials such as soil, rock, and vegetation.
Electronics	Includes audio and video equipment, cellular telephones, circuit boards, computer monitors, printers and peripherals, computers and laptops, copier, and fax machines, PDAs, pagers, tapes and discs, and televisions.
Furniture	Includes mattresses and box springs, upholstered and other furniture, reusable household and office goods.
Glass	Clean glass containers and plate glass ¹ .
Metal	Clean ferrous and non-ferrous metals, including tin-plated steel cans, aluminum cans, aerosol cans, auto bodies, bicycles and bicycle parts, appliances, propane tanks, and other mixed materials that are primarily made of metal.
Moderate Risk Waste	Moderate risk waste from households and small quantity commercial generators, including antifreeze, household batteries, vehicle and marine batteries, brake fluid, fluorescent lights, oil-based paint, thermometers and thermostats, used oil, and oil filters.
Organics	Food scraps and food-soiled paper; fats, oils, and grease (FOG); biodegradable plastic kitchenware and bags ² ; yard waste, woody materials under 4 inches in diameter; and stable waste (animal manure and bedding).
Other Materials	Includes latex paint, toner and ink cartridges, photographic film, tires, and other materials reported as recycled to the Department of Ecology in response to annual recycling surveys.
Paper	All clean, dry paper including printing and writing paper, cardboard, boxboard, newspaper, mixed paper, and aseptic and poly-coated paper containers.
Plastic	All clean, single-resin plastic numbers 1 through 7, including containers, bags, and film (wrap).
Textiles	Includes rags, clothing and shoes, upholstery, curtains, and small rugs.

¹ 1 Plate glass is not accepted in curbside programs.

² 2 Biodegradable plastic products must be approved by organics processing facility receiving the material.

1 **Q. In King County, which of these listed items are carriers required to pick up?**

2 A The Solid Waste Management Plan describes “Single-family minimum collection
3 standards” for recyclables to include “Newspaper, cardboard, mixed paper and
4 polycoated paper; Plastic bottles, jugs, and tubs; Tin and aluminum cans; Glass bottles
5 and jars; Aseptic packaging; Small scrap metal.” Here is the relevant Table 4-5 from
6 the King County Solid Waste Management Plan:
7
8

9
10 **Table 4-5. Single-family minimum collection standards**

11

	Garbage	Recyclables	Organics
Required Materials for Collection*	Mixed solid waste	Newspaper, cardboard, mixed paper, and polycoated paper Plastic bottles, jugs, and tubs Tin and aluminum cans Glass bottles and jars Aseptic packaging Small scrap metal	Yard debris Food scraps Food-soiled paper
Container Type	Containers or wheeled carts	Wheeled carts	Wheeled carts
Container Size	Subscriptions available for various sizes	90+ gallon if collected every other week Smaller size if collected more frequently or if requested by customer	90+ gallons if collected every other week Smaller size if requested by customer
Frequency of Collection	Minimum of once a month	Minimum of every other week	Minimum of every other week
Fee Structure	Fee increases with container size	Recyclables collection included in garbage fee Additional containers available at no extra charge	Organics collection included in garbage fee Additional carts may be included in base fee or available at an extra charge Customers requesting smaller carts may be offered a reduced rate

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*Subject to status of recyclables on King County's Designated Recyclables List

1 As I understand it, they will also pick up construction debris from drop boxes.
2

3 **Q. What about the materials not picked up by the carriers?**
4

5 A The Plan relies on self-haul by the public. Or, customers can use a service like
6 Ridwell's for that small portion of the designated recyclables that it picks up.
7

8 **Q Which of these items does Ridwell pick up from its customers?**
9

10 A. The only ones we regularly pick up are: textiles, plastic film (wrap), household
11 batteries, and fluorescent lights. Through our rotating categories, we have also featured
12 electronics, and toner/ink cartridges. Latex paint was once an add-on category
13

14 **IV. IMPACT OF RIDWELL'S OPERATION ON THE WASTE STREAM**
15

16 **Q. What is the impact of Ridwell's operations on the waste stream.**
17

18 A. Between November 4, 2019 and April 1, 2020 we offered pickups for 26 categories.
19 Of those 26 categories, 21 (81%) of those categories were items where some portion
20 were donated and reused, while the remaining 5 (19%) were exclusively recycled by
21 specialized recycling partners that are not available through curbside collection.
22

23 Certainly, Ridwell's customers could have themselves transported items from each of
24 the 26 categories to various donation or recycling centers, but our experience is that
25 they do not do that. As a result, many of the items in the 26 categories would have
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1 ended up in the garbage can or remained in people's homes if Ridwell had not picked
2 them up.

3
4
5 **Q Have you attempted to quantify the amount of material diverted from the waste**
6 **stream?**

7 We are hoping to do a study to quantify both the volume of waste that is still generated
8 by Ridwell customers and the level of contamination relative to a city average. It
9 would be harder to do this longitudinally to show these measures before and after
10 Ridwell since we have not been tracking people before using our service. We could
11 undertake an exercise like that, but it is not currently being planned. However, we
12 know that between November 4, 2019 and April 1, 2020, Ridwell picked up
13 approximately 74 tons of materials. A small fraction of that material has to be
14 discarded, such as some of the plastic film that is not recyclable. But well over 99%
15 of what we pick is kept out of the waste stream.
16
17
18

19 **V. IMPACT OF RIDWELL ON EXISTING SOLID WASTE CARRIERS**

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21
22 **Q. In your opinion, have any incumbent solid or recycling transporters lost any**
23 **business because of your operation?**

24 A. We believe there to be very little loss on the part of the incumbent companies. In fact,
25 it may have improved their businesses as a result of our operation. The only loss in
26 business could come from when customers downsize their garbage can size. However,
27
28

1 we have heard of very few instances of this happening. And we have heard of nobody
2 who has cancelled their garbage service altogether as there are many kinds of waste
3 where Ridwell is offering no solutions.
4

5
6 **Q. How could the companies benefit from having their customers also use your**
7 **services?**

8
9 A. If someone keeps the same can, but has reduced volume (because, for example, plastic
10 film or clothing/shoes are now going to Ridwell), then there are fewer operating costs
11 on the part of the hauler to move around and dispose of the garbage it collects.
12 Additionally, many Ridwell customers previously improperly recycled plastic film and
13 other categories we collect, so by providing greater access to specialized recycling
14 services, contamination is going down, MRFs operate more efficiently, and traditional
15 solid waste companies are able to sell a higher quality product.
16

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18 **VI. REACTION OF CUSTOMERS AND THE COMMUNITY TO RIDWELL'S**
19 **OPERATIONS**

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21 **Q. Have you been able to assess the reaction of your customers to your service?**

22 A. Yes. We have a robust system of soliciting and recording customer comments. At
23 different intervals in a customer's tenure, we ask them to provide a customer
24 satisfaction rating. Many also provide comments there and when they begin service.
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1 **Q. What has been the reaction of your customers and potential customers to your**
2 **service?**

3
4 A The reaction has been overwhelmingly positive in ways not often shown to consumer
5 brands. We get comments all the time from customers using our service who love it as
6 well as those who are extremely excited for us to expand to where they live. I have not
7 seen the level of excitement exhibited towards Ridwell in any business I have ever
8 been a part of. I am providing as Ex. RM-16, a compilation of such customer
9 statements. Here is a typical one:
10

11 “What you are doing is so important. You’re doing amazing work. Thank
12 you for what you’re doing to make my daughter’s future better”

13 And here is one that just came in recently:

14
15 “I think joining Ridwell has been one of my smartest decisions. It makes a
16 difference not only in reducing and reusing waste, it cares about our
17 community and has taken an active role in helping others during these
18 difficult times. Thank you Ridwell!”
19
20

21 **Q From these comments and from other interactions with customers, do you have a**
22 **sense of what the customers intend for the materials they leave out for you to**
23 **pick up?**

24 A. Yes. Our customers are using our service so they can avoid sending their possessions
25 to a landfill or contaminating MRFs through improper recycling. They intend for their
26 products to be kept from a landfill and either reused locally or recycled. In other
27
28

1 words, if you ask our customers, each category has positive value because they are
2 choosing to place it carefully in a Ridwell bin rather than throwing it in the garbage.
3 Sometimes that shows up in very positive ways, like the \$25,000 in grants to a local
4 women's shelters that is expected to come from a recent jewelry rotating category.
5 Other times the positiveness comes from the satisfaction the customers receive from
6 keeping things from landfills that could go to other destinations.
7

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9
10 **Q. Do you sense that your customers are throwing away old stuff?**

11 A. No, not at all. In a sense, it is just the opposite of disposal. They want to find a higher
12 use for some of their "stuff" that is either no longer useful for them or would have a
13 higher use elsewhere
14

15
16 **Q. What has been the reaction of your community partners.**

17 A. Again, very positive. We have a letter of support from some of our non-profit
18 partners, which is provided as Ex. RM-17. Recently, as more partners have become
19 aware of Ridwell we have also received requests for specific items that non-profits
20 need to serve their communities. We try to accommodate these, such as an upcoming
21 pickup for diapers and baby food we learned about after an organization, Babies of
22 Homelessness, was very low on these categories.
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1 **Q. Have you received compliments from state and local officials?**

2 A. Yes. As Ridwell was navigating our regulatory and legislative options earlier this
3 year, we met with many state officials, including state legislators. Provided as Exh.
4 RM-18 are two letters of support for our permit efforts signed by 23 state legislators
5 supporting our operation. Exh. RM-19 is supportive letter from the Sustainability
6 Manager for the City of Mercer Island. Additionally, on page 63 of Staff's
7 Investigation report, an official with the City of Kirkland stated "Kirkland would not
8 have any issue with them (Ridwell) operating in our City collecting those specific
9 items that Waste Management does not have the exclusive right to collect."
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13 **VII. INTERACTIONS WITH COMMISSION STAFF**

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16 **Q. Please describe your first interactions with the UTC Staff and subsequent**
17 **interactions. How did you first hear of their concerns? Were you surprised that**
18 **you may need UTC permits?**

19 A. We first heard from the UTC in May of 2019. We were surprised to learn about these
20 permits because we have been providing a service that each of our customers could
21 perform on their own if they had the time and the information. After doing additional
22 research, we also thought that we did not need a Solid Waste Permit because so many
23 of our categories are reused and because any categories that partners of ours recycle
24 are not offered in curbside recycling.
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1 **Q. Would you say you have been cooperative and responsive to UTC staff inquiries**
2 **and concerns? Were there delays in your filing applications for permits?**

3
4 A. We have always responded to the UTC by the deadlines they have set. We have taken
5 their phone calls and have offered on numerous occasions to travel at our expense to
6 Lacey to meet in person, something that ultimately occurred in December after our
7 State Senator helped arrange a meeting.

8
9
10 **Q. Would you say that UTC Staff have been helpful?**

11 A. They have typically responded to questions we have asked. Because what we are
12 doing has not been done before, they have not been able to provide past examples for
13 us to learn from. So, we have had to navigate their requests with limited information
14 sometimes.

15
16
17 **VIII. PRACTICAL IMPLICATIONS OF BEING REGULATED AS A SOLID**
18 **WASTE COMPANY**

19 **Q. What would be consequence to your business if the Commission were to classify**
20 **Ridwell as a solid waste company subject to the requirements of the solid waste**
21 **statutes in RCW 81.77?**

22
23 A. I don't know how we could operate using our business model. We are a small,
24 entrepreneurial team with limited financial resources who make changes quickly based
25 on opportunities for reuse and recycling that exist beyond city services for the small
26 subset of a population who voluntarily chooses to use Ridwell. We are not a traditional
27
28

1 garbage hauler providing a utility-like service to every home in ways that are much
2 more uniform and predictable. We foresee challenges to our business across four
3 areas: tariffs, billing and accounting, territories and maps, and vehicles that I will
4 elaborate on below.
5

6
7 WAC 480-70 includes an entire section on tariffs, and its definitions do not apply to
8 us. We do not use carts, containers, drop boxes, etc. in the way garbage utilities do.

9
10 Companies providing that service have clarity on the operations requirements to
11 provide service using those materials and that terminology, as well as the price they
12 need to charge to make a rate of return for shareholders. We learn of new categories
13 often and quickly mobilize so our customers can see their old possessions maintain
14 value and avoid landfills. A recent car seat pickup is a good example. We learned of a
15 temporary local recycling option and work with a partner who will provide used car
16 seats to low income families who can reuse them. Our goal for customers was then to
17 pick up old car seats sitting in their garages and provide the car seats to ideally be
18 reused or recycled if that is not possible. Before picking up car seats, we did not know
19 the ratio that would go to either case, nor did we know the cost to provide this service.
20
21 Had a tariff been required, we would have had to submit materials to the commission
22 well in advance, using definitions that do not apply, and then an additional tariff once
23 this opportunity ended. Because we work with over 30 categories and are adding new
24 ones all the time, we would need to add a member of our staff whose primary
25 responsibility would be filing and modifying tariffs in ways that seem at odds with
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1 how tariffs are handled by traditional garbage haulers with less dynamic service
2 offerings.

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5 The regulatory fees associated with solid waste companies are based on the amount of
6 their revenue and customers that are tied to solid waste-related activities. Because our
7 business involves more categories that are reused than recycled (and therefore, not
8 solid waste activities under any definition) we would need to spend considerable
9 accounting resources in calculating jurisdictional and non-jurisdictional data in order
10 to comply with the reporting requirements.

11
12
13 Our primary business model features three pricing options: a 3-month plan, a 6-month
14 plan, and a 12-month plan, which is different than the options that would be afforded
15 to us under WAC 480-70-396. Subscribers of each of our three plans are then offered
16 opportunities for additional pickups they can choose to pay more for. We came up
17 with these three because each new customer is provided with a metal box for their
18 porch, as well as bags they can use to source-separate their materials and these
19 materials are costly to provide. This means that if a customer signed up for only one
20 month, we'd be losing money that is only made up if they continue being a customer
21 for three months or more. We could alter our prices to be considerably higher to
22 account for our costs, but this would result in a higher price for customers than they
23 pay today. Additionally, customers appreciate the 12-month option as over 65% have
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1 voluntarily opted for that longer-term option that is not allowed for in solid waste
2 regulation.

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5 Monopoly solid waste carriers are required to submit detailed maps on the territories
6 where they provide service as part of WAC 480-70-056. Rather than service every
7 household in the whole area, we service only residents who voluntarily choose to use
8 Ridwell. There is a ceiling on the number of people within a location who will ever be
9 interested in our service, so we need to be able to identify new areas that have levels
10 of demand where our service can function with enough density to be viable. We
11 monitor this interest by sign ups on a waiting list where prospective customers provide
12 their email address and zip code. With zip codes as the unit for determining service
13 availability, to comply with the mapping and territory requirements, we would have to
14 be constantly locating paper USGS maps outlining zip codes or would have to add
15 expertise in GIS software that we do not yet have and doing so would likely come
16 with both software costs and labor costs that would be difficult to absorb for a
17 company of our size.

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22 To provide service at our current pricing levels, we use a combination of passenger
23 vehicles and a cargo van. Both have a gross vehicle weight of less than 10,000 lbs.
24 The passenger vehicles are those owned by drivers who use the same vehicles for
25 other purposes when not in service of Ridwell. That would make it impossible to apply
26 permanent markings on the side of each vehicle with our name and certificate number
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1 as required by WAC 480-70-206. Moving to an entirely Ridwell-owned fleet to be
2 able to apply markings would involve a considerable rate increase for customers and
3 would not be necessary for any other operational reasons.
4

5
6 These are just a few of the issue I see. There would be more. Without a public policy
7 need to impose these requirements on Ridwell, or companies like them, I just do not
8 understand why it would be in the public interest to do so.
9

10
11 **Q. Do you have anything else you want to add?**

12 A. Just this: I hope the Commission will interpret and apply its statutes in a manner that
13 will implement Washington's strong policy preference to keep materials out of the
14 waste stream by prioritizing reuse of materials over disposal and to find ways to
15 (paraphrasing Ridwell's vision and mission statements) empower communities to
16 build a less wasteful future and make it simple for people to find new options for their
17 old and unused things. Additionally, while this hearing is taking place many residents
18 of Washington are struggling due to the effects of COVID-19. Supplies like food and
19 toilet paper are not available to a number of Washington residents right now who are
20 facing unprecedented levels of unemployment and legitimate safety concerns from
21 being out in public. We have unique capabilities to meet some of these needs at no
22 cost to the taxpayers and doing so through the generosity of our 7,000+ members is
23 something we are committed to doing.
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