

TG-230429

May 30, 2023

Received Records Management May 30, 2023

Ms. Amanda Maxwell Executive Director and Secretary Attn: Records Section Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

RE: Tariff Revision to Tariff Items 240 and 240-1 for Waste Connections of Washington, Inc., Certificate Number G-253

Dear Mr. Maxwell:

As a part of recent and ongoing automation efforts to improve safety and efficiencies, Waste Connections of Washington (WCW) is in the process of replacing residential can service with carts. Automated equipment can safely collect dozens of homes per hour, but it cannot collect commercial containers. The rear-load vehicles being phased out are more flexible in their capabilities but are several magnitudes slower and less safe than the side-load trucks used for carts. In order for the investment in automation to reach its goals, it is important that most customers utilize the cart system, leaving the containers for commercial use. Cart service meets the volume needs of most single-family residences and is the standard service throughout the US.

Approximately 500 household customers in unincorporated Clark County have opted for container service in lieu of can service. As with a similar request by Yakima Waste Systems, WCW is not requesting a change in rates. Instead, WCW requests additional language under Item 240: Container Service—Dumped in Company Vehicle, clearly stating that container service is intended for commercial business. Customers who cannot demonstrate that they are a business will not qualify for regular container service. Under this proposal, single family customers may still choose container service, but only at substantially higher pricing for on-call collection charges. Single families who operate businesses on their properties that qualify as such under WAC 480-70-041 would be able to continue their current service under the commercial rate table.

Customers subject to conversion will see a decrease in rates. A customer with a 1-yard container serviced weekly currently pays \$102.48 per month before taxes. The default replacement of 2 96-gallon carts will cost \$68.74 per month. Similarly, a swap of 3-96 gallon roll carts with a 1.5 yard container serviced weekly will result in a decrease from \$135.39 to \$103.11.

The customer letter accompanies this request, which has been reviewed by John Cupp and will be



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mailed by May 31, 2023. WCW will also make a good-faith effort to contact customers individually by phone during the month of June to facilitate appropriate accommodation. Finally, because automation is generally implemented over time, it is important to note that these changes will be rolled out over approximately two months. The Company will change billing rates and service descriptions soon after delivery of the carts is confirmed.

In addition, WCW also asks the Commission to revise Item 240-1: Pickle Fork Container Service—To Disposal Site and Return. First, the name of the item is outdated and confusing to customers. This service is intended for one-time clean-up projects. WCW calls this "Rent-A-Bin" service in its incorporated cities. For consistency and improved messaging, WCW asks to extend this nomenclature to the UTC service area. Second, we request that service levels above 4 yards be removed from the tariff because large containers have damaged our equipment and are difficult to safely manage when full. The Company does not seek changes to the remaining rates.

WCW respectfully requests this filing to become effective July 1, 2023. Since customers will see a reduction in rates due to the change from container to cart service WCW is filing this under WAC 480-70-262 - Tariffs Requiring Seven-day Notice to the Commission. Additionally, WCW is requesting an exemption from workpaper requirements described in WAC 480-07-520 as we are not requesting any changes to the rates in the current tariff. With this request the Company is willing to provide Staff information to assist in their review of this matter.

If you have any questions regarding this filing, please contact me at (360) 566-6925 or via email at Lindsay.Waldram@WasteConnections.com.

Sincerely,

Lindsay Waldram Senior Pricing Analyst