BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Docket No. TG-230778

Complainant,

v.

MURREY'S DISPOSAL COMPANY, INC. d/b/a OLYMPIC DISPOSAL,

Respondent.

RESPONDENT MURREY'S DISPOSAL COMPANY, INC'S PREFILED DIRECT TESTIMONY OF MARK GINGRICH

MARCH 19, 2024

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Table of Contents I. IDENTIFICATION OF WITNESS II. SUMMARY OF TESTIMONY......2 III. IV. SUMMARY OF TESTIMONY As detailed herein, Mr. Gingrich will address general operations and safety aspects of the Company's service and particularly address issues such as incentive pay, employee meals, "Blue Team" temporary employment assignments and safety and training expenses at issue in this proceeding.

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PREFILED DIRECT TESTIMONY OF MARK GINGRICH LIST OF EXHIBITS

Exh. MG-2 Gingrich Resume 2024

Exh. MG-3 Expense Policy Report (C)

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I. IDENTIFICATION OF WITNESS

- Q. Please state your name, business address for the record.
- **A.** My Name is Mark Gingrich. My business address is 4822 70th Ave. E, Fife, WA 98424.
- Q. Please describe your professional qualifications.
- **A.** Refer to my resume at MG-2 "Gingrich Resume 2024"
- Q. What are your responsibilities with respect to the operation of the Company?
- A. I am responsible for all solid waste management operations for the Waste Connections 'Rainier Division,' which consists of 17 hauling and post-collection solid waste and recycling companies spread throughout a North-Western portion of Washington State. This includes management, oversight of hauling operations, post-collection, landfill, and recycling locations, as well as maintenance, customer service, sales, medical waste collection, and recycling. I am part of a management team that makes strategic decisions regarding municipal contracts, regulatory and environmental requirements, personnel, forecasting, budgeting, the deployment of capital post-corporate approval, customer service and sales initiatives. Specifically, my duties also include managing 46 employees in leadership capacities in the markets we serve.
- Q. How long have you been working with the Company?
- **A.** This August will be my twenty-second year working with the Company. During that time, I have had nearly 11 years of responsibility for operations within Washington State.
- Q. During that time what have been your job duties?
- A. During my nearly 22 years with the Company, I've held a variety of positions of increasing responsibility working at and/or responsible for numerous Waste Connections sites throughout the western US. My background and knowledge of the industry is quite broad, having started as a Customer Service representative and holding

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such leadership responsibilities as Customer Service Manager, Operations Manager, District Manager, and Division Vice President. Approximately half of my career has been in Washington State, including several years where I had responsibility for a large hauling district with multiple tariffs. Additionally, I hold a commercial driver's license (CDL) and am a current Board member of the Washington State Refuse and Recycling Association. (WRRA).

II. SUMMARY OF TESTIMONY

- Q. Please summarize the topics of your testimony in this docket.
- A. My testimony will provide additional information and perspective on some of the topics described in Joe Wonderlick's testimony. I will provide information and insight from the operational perspective I have cultivated over tenure with the Company. During this time, I have seen firsthand the positive impact many of the items I will discuss have had on employees, the Company, and the community. My testimony will discuss:
 - a. A description of work-performance, metric-based compensation programs, (also referred to as incentive pay programs), and the indispensable nature of these programs for the Company;
 - b. Description of travel-related expenses, including lodging, meals, automobile
 mileage reimbursement and off-site meeting expenses, to include the Company's Blue
 Team program, and the indispensable nature of these expenditures for the Company;
 and
 - c. Description of the annual safety-event, and the indispensable nature of this program for the Company.

III. DISCUSSION OF INCENTIVE PROGRAMS

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Q. What is a straight pay program, and what are the advantages of incentive pay programs?

A. A straight pay program is a traditional hourly pay system in which an employee earns a per-hour rate until an overtime threshold is reached, after which an employee earns a premium pay rate (overtime).

Like many employers, Olympic Disposal has introduced a series of programs that allow employees to earn above their straight pay when they prioritize or perform selected activities with extra care and attention. Integrating incentive pay programs with mentorship and coaching offers numerous advantages over a traditional straight pay structure. These combined programs motivate employees to exceed expectations, align efforts with organizational goals, foster a high-performance culture, and strengthen talent retention while equipping employees with skills for consistent outstanding results. The cost-effectiveness of incentive pay is clear, aligning directly with employee contributions and creating a merit-based recognition system that fosters a results-oriented work environment.

- Q. Does payment of a compensatory wage structure contribute to or otherwise insure the development of a successful program?
- A. Absolutely, but the aim of our incentive programs extend beyond mere compensation; we recognize that new hourly hires may initially hesitate to fully embrace incentive structures, preferring the security of a consistent wage. Our strategy involves offering competitive average "straight time" hourly and overtime pay to new hires while using incentives to boost performance levels. We've observed that improved performance becomes contagious within our workforce: self-motivated employees who engage with incentive programs create an atmosphere of peer encouragement, inspiring others to enhance their own performance. Ultimately, if our employees operate at 110% efficiency compared to what we'd typically see with straight pay wages, we're willing to reward

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them with incentive payments ranging from 105% to 110% above market average. This approach yields a more productive, stable and positive workforce. Our ratepayers benefit from the heightened satisfaction, efficiencies, experience and commitment of our service professionals, surpassing what a straight wage could achieve.

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Q. Are these programs unique to Olympic Disposal or Waste Connections?

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21 22 A. No. As stated in an article published by Robert Half, from November 8, 2022, I understand that about 57% of typical employers now offer some sort of incentive payments. Post-pandemic I would expect that that percentage has only increased in the face of nationwide labor shortages. Although incentive program specifics and goals discussed here are unique to Olympic Disposal and Waste Connections, incentive programs are again prevalent in a wide variety of organizations, as evidenced by the article referenced above.

0. Does it concern you that your approach on incentive pay might be different than others?

No. Over the years, I have been involved in more than a dozen acquisitions of garbage Α. hauling companies. Within a year or two, we nearly always energize the prior company workforce and see solid improvements in a variety of metrics, from safety performance, reduced truck downtime, improved customer service, and more. Incentive programs are not the only factor at play in these improvements, and progress is rarely linear, but I've seen enough benefits of incentive programs over the past 20 years to now swear by them.

Q. What are the specific incentive programs you are going to discuss in your testimony?

I will speak to the business benefits of the programs listed in the table below. I've also A. listed the full cost to Olympic Disposal for each program in the test year. The cost allocated to the regulated area is about 60% of these totals, depending on the allocation

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factor used. Mr. Wonderlick's testimony contains the specific policies as exhibits, and the general rate case workpapers also contain the exact dollars applicable to the regulated area.

Incentive Program Name	Primary Purpose	Total Company Test Year Expense
Tooty "Secret Shopper" Incentive Program	High performing customer service individuals and teams	\$10,975
Accounts Receivable Collection Program	Effective use of customer collection calls and other tools to expedite payment from delinquent customers	\$1,663
Sign On/Stay On Incentive Program	Motivates a potential candidate to take a position with Olympic Disposal	\$23,000
Referral Incentive Program	Encourages employees to actively promote employment with the Company to like-minded people in the community	\$3,200
Safety Culture Incentive Program	Encourages employees to take safety and a positive workplace culture to heart through action	\$13,108

- Q. Please describe the Tooty "Secret Shopper" incentive program listed above, and its benefit to the organization.
- **A.** "Tooty" Program –Tooty, Inc. ("Tooty") offers a variety of programs to evaluate customer service and employee performance. Tooty's qualifications include garbage industry experience, including offering "Garbage University Training." Although the Company does not subscribe to this employee training program, we appreciate the

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industry specific knowledge that Tooty brings to the company to evaluate and provide coaching opportunities for our Customer Service Representatives.

The Tooty Incentive program evolved out of the Company's subscription to Tooty's "secret shopper" training program. In this program, Tooty places 5 calls each month to our Customer Service Representatives. On these calls, a Tooty employee acts as a customer in the Company's service area. They pose a variety of different questions and scenarios, including requests for new service, service change, and cancellation of service. The customer service representative is evaluated and scored on specific procedures they do or do not follow during the call. Tooty then submits the results to a Company manager, and those results are utilized for important coaching sessions. Only employees who receive a score of 90% or higher are eligible for incentive pay.

Q. Why the focus on customer service representatives?

As front-line employees, Customer Service Representatives are employees that interact with customers and government entities every day. Learning the nuances of solid waste service takes continuous training and attention to detail. Customer Service Representatives must have knowledge on multiple tariff areas and rate structures, including ensuring compliance with Washington Utilities and Transportation Commission ("WUTC") approved tariffs. The Company also prides itself on having very brief hold times when an inquiring customer calls. Further, the skills developed through this program translate well into other Customer Service roles, such as billing accuracy and customer education. These individuals are key in communicating the Company's acceptable recyclable materials, and receptacle placement instructions for efficient and safe collection, among many other service-related

education elements.

Q. What is your view is the cost/benefit of this specialized Tooty training and incentive pay program?

- A. The overall cost of this program is minimal, at approximately \$.30 to \$1.25 per hour. The benefits of this program outweigh the nominal cost of the program. For all the reasons I stated above, I believe it is imperative Tooty program incentive pay is included in rates. For additional program specifics please also refer to the Tooty Program Policy in Joe Wonderlick's testimony Exhibit "JW-21C Tooty Incentive Program (C)."
- Q. Please describe the Accounts Receivable incentive program listed above, and its benefit to the organization.
- A. The objective of this incentive program is to reward Account Receivable Collections
 Representatives for meeting and/or exceeding Company payment collection goals and
 continually improving collection metrics while remaining customer service focused.

 Metrics include: dollar percent of 60 and 90 day customer outstanding balances collected,
 number of accounts in those categories collected, Days Sales Outstanding improvement,
 and bad debt expense improvement.

 Collecting outstanding customer balances is a challenging task in any industry. Our
 industry is complicated by the overlay of various City contract and State regulatory rules
 and laws that govern collection procedures. As you are aware, the required collection
 process and related service cancellation for our regulated customers is specifically
- Q. What other issues are implicated by invoice collection rates?

prescribed in WAC 480-70-376 for regulated customers.

A. The percentage of bad debt is one of the components the Company inputs into the Lurito-Gallagher model to arrive at our revenue requirement. The higher the bad debt percentage, the higher the revenue requirement. Therefore, reducing bad debt also results in a reduced impact on customer rates. At a cost of approximately \$1.25 per hour, this

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incentive program pay is a cost that is targeted, reasonable and necessary for our Company and should be included in rates.

For more program specifics, refer to the Accounts Receivable Collections Program Policy in Joe Wonderlick's testimony – Exhibit JW-17C "Accounts Receivable Collection Program (C)."

- Q. Please describe the Onboarding (Sign On and Referral) incentive programs listed above, and their benefit to the organization.
 - Sign-On incentive pay can range from \$1,000 to \$5,000 per individual employee, depending on the position, market, and amount of time the position has been open. The Company has historically found that attracting and retaining employees, at any level within the Company, is historically difficult in the solid waste industry and that has been exacerbated by the post-pandemic labor market nationally and the low unemployment rates. Driver candidates for instance, must pass strict driving record standards, potentially work non-standard shifts, including some holidays, and endure the day-to-day difficulties and risks inherent to operating a heavy vehicle. This is not always appealing to those in the job market. Hiring for professional positions also has its difficulties. Our industry requires a unique mix of professional, technical, and "boots on the ground" traits. Many professionals are not drawn to this environment. We continuously experience the loss of good candidates to employers with more recognizable branding or those that do not require front-line employee and managerial in-person attendance in the environmental arena. For more program specifics, refer to the Employee Referral and Stay On Incentive Program Policies in Joe Wonderlick's testimony - Exhibit JW-19C

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"Employee Referral Program (C)," and Exhibit JW-20C "Stay On Incentive Program (C)."

Q. Are there other benefits to offering incentive pay particularly to front-line employees?

Yes. Through experience, the Company has found that reducing the time a position is A. open by offering sign-on incentive pay is less expensive than paying overtime. Further, continued unfilled positions increase the risk of additional turnover due to reduced employee morale and "burn-out," safety risks, and the potential for service interruptions caused by understaffing.

What about pay for referring prospective employees? Q.

The same points apply to Referral Incentive Pay, with the addition of lower cost per hire compared to engaging external marketing/recruiting agencies, higher-quality candidates which means less time spent interviewing candidates who don't fit the Company's needs, and protection of Company culture and brand, with increased employee retention. According to HR Morning, "candidates hired through employee referral programs have higher retention rates than those sourced through other channels. In fact, referred employees remain with the company 70% longer than non-referral hires. On average, they have a 46% retention rate compared to 33% for job board hire." An additional benefit from a financial standpoint is the reduced hiring costs, which allows us to rely less on external marketing programs and focus on our current employees as tools to a candidate pool. Interestingly, "7% of all applicants are referrals, but comprise up to 45% of all hires".

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¹ Castrillon, Caroline, "The Complete Guide To Effective Employee Referral Programs, HR Morning, June 5, 2023, https://www.hrmorning.com/articles/employee-referral/#:~:text=Candidates%20hired%20 through%20employee %20referral,according%20to%20research%20by%20Zippia (Last accessed March 19, 2024).

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Q. What are your conclusions about sign-on and referral incentive pay programs continuing in the future?

- A. Sign-On and Referral Incentive Program payments are and will continue to be recurring and necessary business expenses as the labor market continues to evolve and present challenges for our industry. For this and the reasons I listed above, I believe these program costs should be included in rates.
- Q. Please describe the Safety Culture incentive program listed above.
 - At Waste Connections, our employees are accountable for creating a culture that perpetuates our values: Safety, Integrity, Customer Service, To Be a Great Place to Work, and Be the Premier Waste Services Company in North America. The goal of the Safety Culture Program is to recognize and reward positive contributions to the culture at Waste Connections. In this program, employees are eligible to earn recognition in the form of Safety Culture Incentive Pay for each pre-planned, approved, and intentional action they complete. Examples of these activities include, leading a safety "tailgate" meeting, leading a designated portion of a safety meeting, having zero coachable DriveCam events for a semi-annual period, formally mentoring a new hire or struggling employee, and getting CPR certification. The maximum incentive earning potential for this program is less than \$.30 per hour, or about \$600/year.

 For more program specifics, refer to the Safety Culture Program Policy in Joe

Wonderlick's testimony - Exhibit JW-18C "Safety Culture Program (C).".

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A. This program encourages employees to venture from their day-to-day duties and learn/cross-train the functions of other departments. When employees understand the full scope of our business, they are empowered to find ways to improve their job duties, contribute in additional ways as well as communicate throughout departments for better

What does the Safety Culture Incentive program entail?

synergy. Promoting from within is a strong value of the Company. This program fosters

that initiative, in turn reducing hiring and training costs, and improving employee morale

and engagement. For this reason, and the reasons I listed above, I also believe these

program costs should be included in rates.

Q. How has the workplace culture that you've have observed changed over the past 22 years?

A. Over the past few decades, employee expectations and motivators have undeniably changed. To continue to be a premier waste services company, we have had to stretch to develop innovative incentive programs that drive home our values, including safety, and deliver observable results. These results may often be hard to quantify but based on my 22 years of experience either being managed, and managing employees myself, it is clear these programs produce tangible workplace improvements. Such plans are ongoing and consistent and are definitely not "management paying management."

Q. How do you view some of these more novel and innovative training and incentive programs?

A. It is true that incentive programs such as those described above likely did not exist when the WUTC started regulatory solid waste collection oversight in 1961. Over the years, as

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incentive programs have developed and evolved, the term "bonus" has been used an allencompassing term to describe any pay other than non-straight hourly or salary pay.

Q. How do you perceive the "bonus pay" label is viewed by staff?

A. In my view, Staff has developed an aversion to that term, and almost automatically disallows any pay that holds that generic title. I believe however that the Staff should evaluate, in the context of the current employment environment and increasing expectation that companies work to foster a culture that benefits employees and customers, the merit of the program and the related pay before making wholesale eliminations or adjustments to the costs associated with the program.

IV. DISCUSSION OF TRAVEL EXPENSES

- Q. There is also disagreement between the Parties on what is termed "travel expenses" in this case as you understand. Please define what expenses are included in the broad category "travel expenses" you mentioned in your introduction?
- Employee travel at our Company is a commonplace and necessary activity. We are A. largely "front line" workers. One cannot provide integrated solid waste collection services remotely, obviously. When employees travel for business purposes, it is the Company's policy to reimburse them for reasonable meals, lodging, airfare or personal vehicle mileage reimbursement. This is standard business practice in virtually any organization..

Q. What types of travel expenses are incurred?

Employees travel to training courses, meetings, and to help cover open positions at other A. affiliate companies. The Company and its affiliates have extensive operating locations and resources expertise throughout the Country. The Company leverages that expertise

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for training, leadership, and support. Travel expense is related to that leverage, minimizing duplication of costs across the system. For instance, in-house training reduces the need for third-party trainers. Sending employees to help at a district with open positions reduces the risk of service delays. For a detailed list of all travel expenses incurred during the test period refer to Exhibit JW-24C "DR8-10 Travel – Details" in Joe's Wonderlick's testimony.

Q. What other illustrations of travel expense can you provide?

- For example, my jurisdiction includes 17 locations. Although the evolution of virtual meetings has decreased the need for travel, there are still circumstances that require me to travel to provide effective leadership and supervision. There are certain conversations and tasks that are more effectively accomplished in-person. This is especially true of meetings with our front-line employees. These employees do not have an office where virtual meetings can be held. In my experience, the intangible benefit of taking the time to meet face-to-face has proven beneficial. Examples of in-person meetings include safety meetings, interviews, coaching sessions, and overall operational review and improvement discussions. To reduce travel expenses, an alternative could be hiring additional senior-level managers to lead a smaller number of locations. This may or may not materially decrease travel, but it would certainly increase salary expenses.
- Q. Please provide specific examples and details for training meetings employees travelled to during the test period.
- The Company's Maintenance Manager attended the Maintenance Manager training at the A. Vancouver, WA Regional Office. The topics included:

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a.	Safety - Cultural Drift presented by Herb Bailey, WCN Western Region Safety
	Manager

- b. Are you a manager or leader? Presented by Kurt Froening, WCN Division VP, Denali (Alaska) Division
- c. Financial review presented by Kevin Joyce, WCN Western Region Controller
- d. Maintenance update presented by Jared Streuli and Dave Torrey, WCN Western Region Maintenance Managers

Some Company employees attended the annual division Meeting. Employees from all departments, including Customer Service, Operations, Human Resources, and Accounting, attended the Division Meeting. The topics there included:

- a. Region and Division Financial Updates by WCN Region VP Dan Schooler and WCN Region Controller Kevin Joyce
- b. Driver Training, Accountability presented by Michael Grove, WCN Western Region Assistant Safety Manager
- c. Engineering Update presented by George Duvendack, WCN Western Region Engineering Team
- d. Legislative Update (WRAP Act, WA Carbon Tax) presented by Jody Snyder, WCN Western Region Government Affairs Manager
- e. Billing and Customer Service training presented by Marie Most, WCN Rainier Division Billing Manager
- f. Managing a Shop with an Ops Background presented by Jared Streuli, WCN Western Region Maintenance Manager
- g. Recruiting Update presented by Mya Kim, WCN Western Region Recruiter assigned to Rainier Division
- h. Recruiting Brainstorm with entire management team in attendance
- i. First Five Starting them Off Right presented by Laura Hoel, WCN Western Region HR Manager

j. Managing Expense presented by Mark Gingrich and Adam Balogh, WCN Rainier Division Senior Managers

- Q. You mention travel meals above. Can you provide more detail on employee meals and their purpose?
- A. Yes. First, I would like to note that non-travel work-related employee meal expenses are also included in this category of expenses. I will include them here so I can address all employee provided meal expenses in this question. As employee meal expenses arise out of several different business purposes, it will be helpful for me to describe each of those business purposes.
 - 1. Travel meals: These are meals provided when employees travel away from their operations base, for reasons I state above, making it difficult to safely or conveniently store food brought from home. This could be out of town travel for a long day or for overnight travel.
 - 2. Training meals: Meals purchased to accompany important training presentations, usually in a group setting. Group meals foster networking and topical discussions around the training material. They also foster teamwork and camaraderie, which is important when employees must rely on each other to complete routes after breakdowns or other problems that occur in the field.

 3. Coaching meals: Supervisors and employees often find it easier to break through communication issues or solve work problems when sharing a meal. Route supervisors perform in-cab route observations, and these often include a meal/break following or during the observation to go over issues without the

interference of a truck or other operational equipment running in the background.

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4. Celebration meals: These meals, often presented in the form of an all-employee BBQ, celebrate an achievement, such as one year of zero safety incidents at a site and encourage recognition and acknowledgment of accomplishments that benefit the company, employees and our customers as a whole.

- Q. Who initiates the purchase of non-travel employee meals?
- **A.** Generally, a Supervisor or Manager initiates the purchase of these meals.
- Q. Who approves the purchase of employee meals?
- A. Meals are reimbursed to employees via the expense report process. Expense reports are prepared by Supervisors and Managers. A Manager and/or Controller who did not incur the expense, or submit the expense report, approves all expense reports up to \$1,000. The Division Controller and Division Vice President approve the expense reports of the site manager, plus all expense reports over \$1,000. The Region controller and/or region vice president also approve all expense reports over \$1,000. See Exhibit MG-3 "Expense Report Policy" for the full report.²
- Q. Above you mention travel expenses related to employees traveling to assist another site. Can you explain that further?
- A. Yes. The Company has a program called "Blue Team." The Blue Team program provides staffing for sites in need of additional support. These staffing needs can arise from voluntary or involuntary turnover, or to fulfill a sudden surge of business at the location. Blue Teams are most often made up of drivers and mechanics but can consist of supervisors or customer service employees. The District Manager will request help from the Division Vice President (DVP) if Blue Team assistance is needed. That DVP will then reach out to

² While it references another number, that Report is actually six pages in total.

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other districts to see if they have any employees available to assist. Based on the responses, the DVP will identify the most efficient options, typically based on location and experience of the Blue Team employees. Blue Team employees will travel to the site in need, and perform their normal functions (i.e. Driver, supervisor, maintenance, customer service, etc.). Depending upon needs at the home site and the recipient site, Blue Team members may only be able to serve in short stints, so several Blue Team workers may fill a single vacancy over different work periods. Mr. Wonderlick reports that Blue Team travel expenses made up more than half of Olympic's travel expense cost for the test year.

Q. Why is the "Blue Team" important?

A. The Blue Team program is a clear illustration of how the Company and its affiliates pool resources to serve our customers and employees when there is a temporary dip in staffing levels due to turnover or vacant positions. Without the Blue Team, there is a risk the affected site might not be able to operate scheduled routes, or repair equipment in a timely manner with immediate impacts on service. While overtime is a tool that can assist in periods of low staffing, CDL (commercial driver's license) holders are regulated by their hours of service and there occasionally may not be enough available hours within our local driver rosters to lawfully operate all our routes. Although Blue Team members are required to travel away from home, the employees selected for this program carry a sense of pride in being able to assist affiliate companies, and more importantly, their fellow co-workers.

Q. What are Blue Team members reimbursed and/or compensated for while assisting another location?

A. Blue Team members receive \$75/day to recognize their extra effort, dedication, and burden of traveling away from home. They also receive another \$50 per diem as reimbursement for food and expenses incidental to traveling away from home. Overnight lodging and

transportation from their home site to the work site is also reimbursed or paid for directly by the Company.

- Q. Does the Blue Team employee's home location or their work reflect/ recognize these expenses?
- A. All Blue Team expenses, including regular wage pay incurred while assisting the location in need, are recognized by that location. This is important to ensure each location knows the true cost of operating their business.
- Q. Can you explain your mention of "safety-event" above, and its significance to the Company?
- A. The company celebrates positive safety outcomes and prioritizes safety in several ways.

 Most importantly, the Company uses a variety of tools to keep safety at the forefront of our employees' minds. As identified previously, daily tailgate meetings and required reading material attempt to implant safety values in the hearts and minds of our employees. Rewards for safe operations over various periods (30 days, quarters, years) without reportable incidents encourage employees to operate safely to maintain spotless records for the entire group.

Finally, drivers who achieve exceptional safety and operational excellence have the opportunity to participate in a driver skill showcase event in which drivers compete to be the best driver at their district, division, region, and potentially, the Company. This event has been named "Safety Rodeo," as drivers compete against one another, testing their driving agility, maneuverability and backing skills against other recognized outstanding CDL holders. Although the name of the event may be unconventional, it is not an event

the employees take lightly, and it is not easy to be eligible to participate. Participation in the safety-event requires the following:

- 3 years of employment with the Company, or affiliated company.
- Zero scored DriveCam events for the previous three years.
- Zero incidents for the previous 3 years.
- Zero disciplinary actions for the previous 3 years.
- Q. By the way, what are DriveCams that you have mentioned previously?
- A. DriveCams are on-board cameras and driving activity recording devices. Scored

 DriveCam events include following another vehicle too closely, rolling through a stopsign, using a cell phone, and not looking far enough ahead, reacting slow to a changing
 light, for example.

With these safety elements in mind, including the annual safety event, drivers are more likely to be alert and safety focused as the do their work along the roads of Clallam and Jefferson Counties Washington. In my view, the ratepayers and their friends, family and neighbors in their respective operating territory are safer and therefore direct beneficiaries of this culture.

- Q. Does this otherwise conclude your testimony at this point?
- **A.** Yes, it does.