

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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

No. TG-200083

MOTION FOR A PROTECTIVE ORDER

I. MOTION

1 Pursuant to RCW 34.05.446, RCW 81.77.210, and WAC 480-07-420, Respondent
Ridwell, Inc. (Ridwell), moves for a protective order in order to protect confidential and
valuable commercial information and financial information as described in those provisions.
Counsel for Commission Staff, the only other party in this proceeding, has indicated that Staff
has no objection to a protective order.

2 We request the standard form of protective order outlined in WAC 480-07-420 with
provisions for both confidential and highly confidential information as defined in WAC 480-07-
160. In addition, because of the logistical limitations on parties and their representatives
working remotely, we request that the Commission in the protective order permit electronic
signatures on all documents, including confidential information agreements, consistent with
WAC 480-07-190 and dispense with the colored paper requirements set forth in WAC 480-07-
160(4) so long as no hard copies of documents are being filed or served.

II. STATEMENT OF FACTS AND LAW

3 We understand that the issue of confidential information could have been raised at the
prehearing conference. However, at that time, Respondent Ridwell had no intention of including
in its case confidential information.

4 The issue has come up in developing responses to data requests from Staff. In those DRs,
Staff requested two types of sensitive information. First, Staff requested the identity of

Ridwell's business partners who work with Ridwell to reuse or recycle the material Ridwell picks up from its customers. This list of business partners was developed over many months and with substantial effort on the part of Ridwell. Second, Staff requested data about the quantities of materials Ridwell picks up in various categories.

5 If this requested information were made public and available to potential competitors such competitors would gain knowledge of Ridwell's business practices. Ridwell spent months, and a great deal of effort, to develop these practices.

6 The hearing in this matter is set for May 12, and, pursuant to agreement of the parties, Ridwell is to provide its responses to Staff's DRs by today, April 29. To be fair to Staff, we would like to meet that deadline, or come close to it, so that Staff can prepare its case, file any supplemental direct testimony it deems necessary by April 30, and participate meaningfully in the Commission-required Settlement Conference that the parties have agreed to hold on May 1, 2020.

III. CONCLUSION AND RELIEF REQUESTED

7 Therefore, Ridwell requests that the Commission issues its Standard Form Protective Order in this matter, modified as described above.

Respectfully submitted,

CASCADIA LAW GROUP PLLC

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Attorneys for Ridwell, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have served the attached Motion for a Protective Order on behalf of Ridwell, Inc., upon the person and entities listed on the service list below via electronic, addressed as show below.

DATED at Seattle, Washington, this 29th day of April, 2020.

/s/ Katie Dillon

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