

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

IN RE RIDWELL INC.,

Petitioner

Docket No.

PETITION AND REQUEST FOR
DETERMINATION, CLARIFICATION,
AND EXEMPTION

I. INTRODUCTION

Petitioner respectfully requests that pursuant to WAC 480-70-016 or, alternatively, WAC 480-70-11(2) the Commission issue an order determining that Ridwell’s operations do not require a solid waste handling certificate under Chapter 81.77 RCW. In the alternative, if the Commission does not grant Ridwell’s request to be exempt for certificate requirements under WAC 480-70-016 or WAC 480-70-011(2), then Ridwell requests clarifications and exemptions from several specific solid waste handling regulations pursuant to WAC 480-70-031, WAC 480-70-051, and WAC 480-07-110. This petition describes the legal basis for Ridwell’s requests, including an explanation of how the exemption criteria and the public interest are served.

II. FACTUAL BACKGROUND

A. Procedural Background

Ridwell and the UTC have been working together to determine Ridwell’s regulatory status since May 3, 2019 when Ridwell received a letter from Mr. Mike Turcott of the UTC concerning Ridwell’s regulatory status. Ridwell responded on May 14, 2019, in a letter outlining how Ridwell’s service operates and the supportive stance of city-

1 contracted haulers. On July 12, 2019, Ridwell had the opportunity to speak with Ms.
2 Kathryn McPherson from the UTC concerning Ridwell's operations. The next day, on
3 July 13, 2019, Ms. McPherson sent an email to Ridwell stating that the UTC did not have
4 jurisdiction over Ridwell at that time.

5 In letters dated October 18 and October 22, 2019, Ridwell received notice from
6 Mr. Mathew Perkinson at the UTC stating that Ridwell needed to file an application for a
7 solid waste certificate or explain in writing why Ridwell does not need one. On
8 November 4, 2019, Ridwell responded in writing indicating that Ridwell was scheduling a
9 meeting with UTC staff to discuss in detail how Ridwell's operations differ from a
10 traditional solid waste company regulated by the UTC. Further, this November 4 letter
11 outlined how Ridwell's business model and collection items differ from those of
12 traditional solid waste haulers. On December 9, Ridwell met with Commission staff in
13 Olympia to discuss Ridwell's business model and to further the effort to gain regulatory
14 clarity. Following this meeting, Mr. Perkinson from the UTC sent Ridwell a letter on
15 December 13, 2019, directing Ridwell to submit an application for a certificate of public
16 convenience and necessity pursuant to WAC 480-70-081(1). Ridwell responded to this
17 letter on December 23, 2019, requesting an extension until January 17, 2020 in order to
18 prepare a petition for certificate exemption as well as providing client quotes in support of
19 Ridwell's services.

20 On January 17, 2020, Ridwell filed the requested application, an alternative
21 application(s) for common carrier permit(s) under Chapter 81.80 RCW, and this petition
22 requesting determination that Ridwell is not required to obtain a solid waste handling
23 certificate for collecting and hauling "solid waste" under RCW 81.77.040.

1 **B. Ridwell's Operations**

2 Ridwell is taking an innovative approach to meet a market demand to minimize the
3 amount of waste entering landfills. Ridwell customers opt to pay for a Ridwell
4 subscription in addition to charges for their regular certificated hauler garbage, yard
5 waste/compost, and recycling costs to avoid this disposal outcome. For this subscription
6 fee, Ridwell provides their residential customers a separate bin, cloth bags and the
7 opportunity to request pick-ups for specific items, including plastic film, bags, plastic
8 packaging, clothes, shoes, textiles, household batteries, and household light bulbs, in
9 addition to rotating pick-up categories. A complete list of the materials Ridwell collects is
10 included here as Attachment 1. Ridwell then works with partners to ensure items are
11 used, reused or recycled. For example, many of the rotating pick up categories are
12 delivered to non-profit organizations that reuse, or distribute to those in need who then
13 reuse these items.

14 Ridwell only collects specific items that are not accepted for curbside pickup
15 under the local comprehensive solid waste plans in the jurisdictions in which Ridwell
16 operates. Ridwell collects four categories of materials every two weeks: (1) plastic film,
17 bags, and packaging; (2) clothes, shoes, and textiles; (3) household batteries; and (4)
18 household lightbulbs. In addition, Ridwell collects a featured fifth category each time as
19 well. Examples include kitchenware, bottle caps, eyeglasses, pet supplies, jewelry and
20 wrapped Halloween candy. Customers can also pay an additional fee for Ridwell to pick
21 up specific additional items such as Styrofoam and car seats.

22 Following collection, Ridwell works with non-profit organizations, and domestic,
23 material-specific recyclers, such as Ecolights, that are permitted to handle and recycle
24 certain materials. Ridwell clients intend that none of the materials collected by Ridwell
25

1 are destined for a landfill or waste disposal.¹ Although the items Ridwell collects are
2 discarded by its clients, those clients pay Ridwell to ensure the items are not treated as
3 solid waste for landfill disposal.² Ridwell also does not collect “source recyclable”
4 materials that are designated and accepted in residential routine curbside pickup for
5 recycling. Thus, Ridwell fills a gap in current solid waste collection services by collecting
6 items not accepted by the traditional solid waste haulers for regular curbside pickup in the
7 jurisdictions in which Ridwell operates.

8 III. ARGUMENT

9 **A. Ridwell’s operations do not require a solid waste handling certificate**
10 **under RCW 81.77 because the majority of material Ridwell collects is**
11 **not solid waste destined for disposal.**

12 1. Most of the items Ridwell transports do not meet the definition of
13 “solid waste.”

14 Ridwell’s primary business involves transporting items, such as used clothing, to
15 non-profit organizations for reuse without any reprocessing. RCW 70.95.030(22) defines
16 “solid waste” or “wastes” as “all putrescible and non-putrescible solid and semisolid
17 wastes including, but not limited to, garbage, rubbish, ashes, industrial wastes, swill,
18 sewage sludge, demolition and construction wastes, abandoned vehicles or parts thereof,
19 and recyclable materials.”³ “Recyclable materials” are a subset of solid waste⁴ that are
20 separated for regular solid waste collection and recycling (e.g., primarily paper, metal, and

21 ¹ Many of the items Ridwell collects will be of value to those receiving them through the local non-profit
22 organization, such as eyeglasses for those in need or bottle caps for a local arts organization. Ridwell’s
23 primary business is to limit the materials that end up in landfills by doing the work—i.e., transporting the
24 materials to the appropriate local non-profit organization or specialized recycler.

25 ² Ridwell’s website highlights its relationship with specialized domestic recycling companies, but Ridwell
does not hold itself out to the public as a transporter of solid waste.

³ Similarly, WAC 173-350-100 defines “solid waste,” “waste materials,” or “wastes” as “all putrescible and
non-putrescible solid and semisolid wastes including, but not limited to, garbage, rubbish, ashes, industrial
wastes, swill, sewage sludge, demolition and construction wastes, abandoned vehicles or parts thereof,
contaminated soils and contaminated dredged material, and recyclable materials.”

⁴ RCW 70.95.030(17).

1 glass) pursuant to a local comprehensive solid waste plan. Some of the recycled materials
2 Ridwell collects could be considered solid waste, except these materials are no longer
3 solid waste because of Ridwell's actions in ensuring the use, reuse, and recycling of such
4 materials.⁵ Under WAC 173-350-021(3), "[a] material that met any of the criteria in
5 subsection (2) of this section *is no longer a solid waste* if it meets *all of the criteria in*
6 *subsection (3)*."⁶ These criteria are:

7 (a) The material is no longer discarded or abandoned;

8 (b) The material has been separated from solid wastes;

9 (c) The material has been recycled, or is ready for reuse, as defined in
10 WAC 173-350-100;

11 (d) The material has positive market value, as indicated by established
12 markets for the material. Paying a person to remove or process the material for
13 recycling, disposal, or incineration is not positive market value, nor is paying a
14 discounted amount for removal or processing;

15 (e) The material is stored and managed to preserve its value, and is stored
16 in a manner that presents little or no risk to human health and the environment; and

17 (f) The material does not contain harmful chemical, physical, biological, or
18 radiological substances that will pose a threat to human health or the environment
19 for its intended or likely manner of use.

20 Under subsection (3) of WAC 173-350-021, a residential generator and Ridwell
21 have the ability to determine that such materials are not "solid wastes." Although a
22 material or item for collection has been "discarded, abandoned or disposed of" by a
23 residential generator under subsection (2)(a), these materials will no longer be considered
24

25 ⁵ See, WAC 173-350-021(3)

⁶ *Id.* (Emphasis added).

1 solid waste if they meet all of the elements outlined in subsections (3)(a) through (f) of
2 this section. To illustrate, one material Ridwell collects, leftover Halloween candy,
3 demonstrates how that material is not a solid waste. When Ridwell arrives at a customer
4 location, and the customer has placed the unopened candy in the white Ridwell bin for
5 pickup, Ridwell collects the candy and works with local charity partner, Birthday Dreams,
6 to provide the candy to a child in need on his or her birthday. Because of Ridwell's
7 actions, the material is (a) no longer discarded, (b) has been separated from solid wastes,
8 (c) is ready for reuse, (d) has a positive market value,⁷ (e) is stored and managed to
9 preserve its value,⁸ and (f) the material does not contain harmful chemical, physical,
10 biological, or radiological substances that will pose a threat to human health or the
11 environment. While the leftover Halloween candy has certainly been discarded by the
12 Ridwell customer, Ridwell, by working with a charity organization partner, ensures that
13 the discarded packaged candy does not end up in a landfill and serves a positive purpose
14 in the community. Ridwell asserts that most of the materials it handles are no longer solid
15 waste due to Ridwell's actions under WAC 173-350-021(3).

- 16 2. For the few materials Ridwell transports that meet the definition of
17 solid waste, the public interest is served by providing customers the
18 alternative for Ridwell to transport these materials for repurposing
and recycling.

19 Ridwell also picks up some specific household materials that constitute solid waste
20 pursuant to statutory and regulatory definitions. However, the materials Ridwell accepts
21 are limited to those materials prohibited from routine traditional hauler recyclables
22 collection under the local comprehensive solid waste plans for recycling. Examples of
23

24 ⁷ Ridwell contends that the candy has a market value even though Ridwell donates the candy at no charge to
a worthwhile charitable cause.

25 ⁸ Birthday Dreams stores the candy in an appropriate manner until it's time to give that candy to a child
experiencing homelessness on their birthday.

1 such materials include household batteries, lightbulbs, Styrofoam and plastic film. These
2 items are considered recyclables that residential customers must deliver (i.e, "self-haul")
3 to an appropriate handler, recycler, or disposer of such materials under current municipal
4 solid waste management plans. Unfortunately, some residential generators may have
5 limited transportation options or may face other barriers to properly transporting these
6 items for proper disposition. Or, they may simply not know where such items can be
7 safely and properly delivered for processing and recycling. In addition, some may simply
8 not want the hassle of transporting such materials to the proper handler—and, may be
9 willing to pay for a service for someone else to pick up and drop off their materials at the
10 proper location.

11 As a result of the "self-haul" requirement, some recyclable items may be
12 inappropriately discarded in the regular residential solid waste collection bins. Such
13 disposal is not only contrary to legislative directive, but to sound environmental practices
14 that most residential generators would prefer to follow. Ridwell helps prevent improper
15 disposal and fills this "self-haul" materials gap in routine solid waste collection, thereby
16 ensuring that such materials are transported for either reuse or proper recycling. For
17 example, some ubiquitous materials that Ridwell transports for recycling that are
18 recyclable, but not eligible for recycling pickup under the local comprehensive solid waste
19 plans, include plastic film and Amazon packaging. A residential generator of these
20 materials would have to dispose of the materials in a garbage bin, or determine where and
21 when to transport such materials to a designated recycling location because the materials
22 would not be collected in routine residential recycling. Many residential generators are
23 willing to pay Ridwell a fee for providing a service not addressed by traditional solid
24 waste collection and disposal services. As a result, a greater amount of materials is

1 recycled or reused and items inappropriate for traditional solid waste pickup are
2 significantly minimized.

3 The Washington Department of Ecology (“Ecology”) 2018 comprehensive
4 amendments to the solid waste handling standards in Chapter 173-350 WAC reflect a
5 clear policy and public interest in averting materials from “solid waste” collection and
6 landfill disposal that Ridwell’s operations promote. The Commission’s jurisdictional
7 mandate directs the proper approach to regulation in this matter because Ridwell’s
8 operations *do not* involve the collection and transport of solid waste for landfill disposal.⁹
9 The purpose of Ecology’s amendments was to provide clarity to residential and
10 commercial generators of discarded materials and improve their ability (i) to identify
11 “solid wastes” apart from commodities and items appropriate for use and reuse,¹⁰ and (ii)
12 to support material recovery and recycling activities while protecting public health and the
13 environment.¹¹ The legislature and Ecology have recognized that many materials
14 ultimately will be improperly discarded or landfilled rather than directed to proper
15 recycling and reuse. Thus, Ecology’s new definitions with respect to “solid waste” reflect
16 a changing policy focusing on a residential generator’s ability to minimize the amount of
17 waste entering landfills or going to incineration.

18 3. Ridwell’s operations do not require a solid waste certificate under
19 WAC 480-70-016.

20 Under WAC 480-70-016(4),¹² the Commission has discretion to determine that
21 Ridwell’s operations require a motor carrier permit and not a solid waste certificate. In

22 _____
⁹ The Commission supervises and regulates traditional solid waste collection companies. RCW 81.77.

23 ¹⁰ Ecology Response to Comments, December 2016, Second Preliminary Draft Ch. 173-350.

24 ¹¹ See WAC 173-350-010 (stating the purpose of Chapter 173 for “[r]eduction and recycling, to protect
25 public health, to prevent land, air, and water pollution, and conserve the state’s natural, economic, and
energy resources”).

¹² WAC 480-70-016(4): “In determining whether operations require a solid waste certificate or a motor
carrier permit, the commission will consider factors including, but not limited to: (a) The intent of the

1 determining whether a company's operations should be exempted from solid waste
2 collection regulation, the Commission looks to particular circumstances. In the case of
3 *Drop Boxes R Us*, the Commission focused on the various intentions of generator,
4 transporter, and receiver of the materials in question.¹³ The Commission proceeded to
5 consider the purpose for the "transportation" and whether such transportation was for
6 disposal stating that "[i]f the transportation is for disposal, the material is garbage. If the
7 transportation is to move an item to a location for a higher use, the transportation is motor
8 carriage."¹⁴ And, in *In re the Matter of Determining the Proper Carrier Classification of*
9 *Glacier Recycle, LLC et al. ("Glacier")*¹⁵, the Commission "noted that in some
10 circumstances, a material could be classified as solid waste because it had no commercial
11 value while in other circumstances the same material could become a marketable
12 commodity and exempted from solid waste regulation."¹⁶

13 Using the analysis in WAC 480-70-016(4) for determining whether Ridwell
14 operations require a solid waste hauler certificate under RCW 81.77, the Commission
15 should consider the intent of Ridwell and the intent of the residential generator to avert
16 such material from landfill disposal. The intended destination of the materials Ridwell
17 transports is not disposal at a landfill. Rather, Ridwell most often transports the material it

18
19 shipper; (b) The intended destination of the shipment; (c) The actual destination of the shipment; (d) Special
20 handling or conditions placed on the shipment by the shipper and/or receiver; (e) The value of the
21 commodity being transported; (f) Whether the carrier is primarily engaged in the business of providing solid
22 waste collection or is primarily engaged in the business of providing a service other than the collection of
23 solid waste; and (g) Whether the carrier holds itself out to the public as a transporter of solid waste."

¹³ See Commission Decision and Order Denying Administrative Review; Affirming and Adopting Initial
22 Order, *In the Matter of Determining the Proper Classification of Drop Boxes R Us, Inc.* and *In the Matter of*
23 *Determining the Proper Classification of Puget Willamette Xpress, Inc.*, Order M.V.G. No. 1840, Hearing
Nos. H-5039 and H-5040 (October 8 1998).

¹⁴ *Id.* at 8, quoting from *In re Sunshine Disposal, Inc.*, Order M.V. No. 133753, App. No. E-19104 (April
24 1986).

¹⁵ *In re the Matter of Determining the Proper Carrier Classification of Glacier Recycle, LLC et al.*, Docket
25 No. TG-072226, Order 06, June 13, 2008.

¹⁶*Id.* at 11.

1 collects from residential generators to partnering non-profit organizations, and, for
2 specific materials like batteries and light bulbs, to a permitted recycling facility.¹⁷ In fact,
3 the materials Ridwell transports may have minimal value to the disposer, but such
4 materials can carry significant value to the ultimate receiver. Again, the example of
5 leftover, wrapped Halloween candy may have minimal value to the disposer—but, for a
6 child receiving this candy through the Birthday Dreams organization, this candy certainly
7 carries a value. Clearly, Ridwell does not hold itself out to the public as a transporter of
8 solid waste or Ridwell’s customers would have no reason to engage its services. These
9 customers could simply dispose of their items as trash for regular garbage collection.
10 Ridwell gives them another option: the Ridwell website emphasizes how it partners with
11 reuse and recycling organizations to “bring your stuff new life.”¹⁸ For these reasons,
12 Ridwell respectfully requests that the Commission exercise its discretion under WAC 480-
13 70-016 in determining that Ridwell is a common carrier and does not require a solid waste
14 certificate.¹⁹

15 4. Ridwell’s operations are exempt from requiring a solid waste
16 certificate under WAC 480-70-011(2).

17 As outlined above, most of the materials Ridwell transports are not solid waste and
18 it serves the public interest to allow Ridwell to transport the minimal solid waste that it
19 does to keep that waste out of a landfill. Under WAC 480-70-011(2)(a), operations are
20 not regulated by the Commission as solid waste when “[t]he operations of a carrier
21 operating under a permit issued by the commission under chapter 81.80 RCW (motor

22 _____
23 ¹⁷ With the exception of boxes for carrying lightbulbs, there are no special handling conditions placed on
such materials Ridwell transports for recycling.

24 ¹⁸ Ridwell website, “Feel good about where your stuff goes,” at <https://www.ridwell.com/> (last visited Jan.
14, 2020).

25 ¹⁹ Ridwell’s application for a common carrier permit will be submitted with this Petition, as well as an
application for a solid waste certificate for consideration in light of the Commission’s determination as to
Ridwell’s appropriate status.

1 freight) [] occasionally transport[] to a disposal site, but whose primary business is not the
2 collection of solid waste.”²⁰ Here, Ridwell occasionally transports collected materials to a
3 special recycling site. But, Ridwell’s primary business is with materials that are not solid
4 waste—i.e., materials that are capable of and valuable for reuse without any reprocessing
5 or change in physical condition. Ridwell has no intention of holding itself out to the
6 public as a transporter of solid waste; instead, Ridwell advertises its services as a specialty
7 service for donating materials, with occasional transport of “self-haul” materials to
8 specialized recycling facilities. As Ridwell believes its operations meet the exemption
9 under WAC 480-70-011(2), Ridwell has applied for a motor carrier permit as part of this
10 January 17, 2020, submission.²¹

11 In conclusion, most of the materials Ridwell transports are not solid waste under
12 Ecology definition. For the materials that Ridwell transports that are solid waste, Ridwell
13 provides an alternative service that serves the public interest and legislative intent.
14 Ridwell has demonstrated that it meets every factor outlined in WAC 480-70-016(4) to be
15 considered by the Commission in determining whether Ridwell operations require a solid
16 waste certificate. Additionally, Ridwell believes its services meet the criteria outlined in
17 WAC 480-70-011(2) for collection and common motor carrier hauling operations that are
18 not regulated as solid waste collection and disposal. Thus, Ridwell’s “primary business”
19 is not the collection of solid waste and as such, the proper regulatory requirement for
20 Ridwell’s unique business operation is a motor carrier permit and not a solid waste
21 certificate.

22
23
24 _____
²⁰ WAC 480-70-011(2)(a).

25 ²¹ As indicated previously, Ridwell’s application for a motor carrier permit is being submitted with this
Petition.

1 **B. If the UTC determines that Ridwell's operations require a solid waste**
2 **certificate, Ridwell respectfully requests clarification and specific**
3 **exemptions from the regulations.**

4 In the alternative, if the UTC concludes that Ridwell's operations require a solid
5 waste certificate, Ridwell has attached its application to this package and requests
6 clarification and exemptions from various sections of the regulations. First, Ridwell
7 requests clarification on how its subscription fee model would be regulated pursuant to the
8 Chapter 480-70 WAC tariff regulations or, more specifically, requests Commission
9 acceptance of Ridwell's schedule of fees for service, a copy of which is attached to this
10 petition as Attachment 2. Second, pursuant to WAC 480-70-051 and WAC 480-07-110,
11 Ridwell requests a specific exemption from WAC 480-70-396, to allow Ridwell to bill
12 subscriptions in advance for six and twelve month memberships to maximize the
13 opportunity (but not the requirement) for customer discounts and savings. Third, pursuant
14 to WAC 480-70-051 and WAC 480-07-110, Ridwell requests a partial exemption from
15 WAC 480-70-181, WAC 480-70-201, and WAC 480-70-206 for the instances when
16 passenger cars are used to supplement the Ridwell-owned vehicle for transport of items
17 for reuse or specialized recycling. As described below, Ridwell does not require an
18 exemption for the Ridwell-owned vehicles. Ridwell's use of individuals who drive their
19 own vehicles for pickups is carefully managed through detailed driver screening and
20 training, vehicle requirements, and liability insurance coverage for this part of its
21 operations.

22 1. Tariffs.

23 Ridwell requests clarification on how the tariff regulations apply to Ridwell's
24 subscription model and acceptance of Ridwell's schedule of subscription fees (Attachment
25 2) as satisfying all applicable requirements of Part VII Tariffs, Rates, and Rate Filings of

1 WAC 480-70, or qualifying for an exemption for any of those requirements as authorized
2 by WAC 480-70-051 and WAC 480-07-110. Based on Ridwell's understanding of these
3 tariff regulations, Ridwell believes it is willing and able to comply with many of them—
4 concerning format, submissions to the UTC such as maps and rates, posting the
5 subscription fees at its office, etc. However, Ridwell's subscription model is very
6 different from traditional solid waste company tariffs primarily because Ridwell is not a
7 solid waste hauler. Ridwell is not hauling garbage and source separated recyclables in
8 large, heavy trucks. Ridwell's contract drivers do not encounter the safety and physical
9 stress of routine garbage pickups. Because Ridwell's service is contracted for voluntarily,
10 it does not have what is essentially a "utility status" for regular tariff collection.

11 Additionally, because Ridwell's services are entirely voluntary. No residential
12 generators pay unless these parties elect to subscribe to Ridwell's services. The traditional
13 tariff model that the Commission regulates are necessary because traditional solid waste
14 haulers generally have no competition in their respective residential markets. As such, the
15 Commission ensures that tariff rates are fair and reasonable for solid waste services to its
16 residential customers that have no choice but to pay such tariffs. The tariff must provide
17 the hauler a reasonable return on its investment in equipment, and sufficient rates to
18 adequately provide reasonable compensation to its employees, to ensure safety, and other
19 important tariff considerations.

20 For Ridwell the traditional tariff financial model is inapposite. Ridwell's
21 customers voluntarily subscribe to its services. Ridwell's charge is not based upon tipping
22 fees, or significant equipment investment or the numerous employees that work for
23 traditional hauling firms. As outlined in Section II above, Ridwell fills a gap in traditional
24 solid waste and recycling pickup and has no ability to compete with the services offered
25 by these companies. Ridwell monthly subscription fee is based upon transport of common

1 goods only. Currently, Ridwell offers services on a three, six, and twelve-month basis.
2 The prices range from \$14 per month for the three-month subscription to \$10 per month
3 for a twelve-month subscription.²² Ridwell's pricing model, which also includes one-time
4 fees for categories like Styrofoam and car seats, supports Ridwell's unique operations.
5 The current pricing model is reasonable, voluntary and serves a clear public interest,
6 which its numerous subscribers consider both valuable and environmentally progressive²³.

7
8 2. Exemption from WAC 480-70-396.

9
10 As explained above, Ridwell does not believe its monthly subscription fee,
11 including volume discounts for longer term subscriptions fits within the typical tariff
12 model. However, if the Commission disagrees, then Ridwell asks for a specific
13 exemption from WAC 480-70-396 to allow Ridwell to offer the longer subscription
14 payment options with the associated larger discounts and customer savings incentives.
15 Ridwell requests that the Commission allow Ridwell to charge six and twelve months in
16 advance where the regulation allows for billing 1, 2, or 3 months in advance. The 12-

17 ²² See Ridwell website, "Pricing," at <https://www.ridwell.com/pricing> (last visited Jan. 14, 2020).

18 ²³ To illustrate how the flexibility of Ridwell's pricing model serves the public interest, it is helpful to
19 consider Ridwell's recent car seat reuse and recycling event.

20 Ridwell learned only a few weeks in advance that a local retailer, Target, was going to collect expired and
21 damaged car seats for recycling. Ridwell was also aware that a non-profit partner, Westside Baby, also
22 collected unexpired and undamaged car seats for reuse. Ridwell attempts to first provide opportunities for
23 reuse, which its members prefer from both an equity and environmental perspective, so any car seat service
24 it provided would include both reuse and recycling possibilities.

25 Ridwell did not know how many car seats would go to which destination, did not know the distance
travelled to do so, and did not know the willingness of customers to pay for this hybrid scenario. Instead,
Ridwell made an educated guess, offered the service, and will modify it for the next opportunity that
becomes available.

Rather than applying for a tariff adjustment for each reuse and recycling opportunity, Ridwell can provide
add-on services at initial pilot rates where the market will guide any adjustments but will also provide
details for any members who wish to instead self-haul materials without paying Ridwell.

1 month subscription is the most popular choice for Ridwell customers. In fact, over 70%
2 of customers to date have voluntarily chosen to pay for 12 months in advance. This is in
3 the public interest as it allows Ridwell customers an easy and convenient way to ensure
4 they limit materials they generate from entering landfills. It also provides Ridwell
5 customers the largest monthly discount, which also serves the public interest.


6 3. Partial Exemption from WAC 480-70-181, WAC480-70-201, and
7 WAC 480-70-206 for vehicles contracted (and not owned) by
8 Ridwell

9 As listed in Ridwell's solid waste application, Ridwell operates a cargo van for
10 some of its operations. Ridwell can comply fully with WAC 480-70-181 and has attached
11 its insurance policy to its Solid Waste Certificate and Common Carrier applications. For
12 Ridwell contracted vehicles (not owned by Ridwell), Ridwell will ensure the vehicles
13 have at least the state minimum coverage and that the owners of the vehicles notify their
14 insurance companies they are using their vehicles for business purposes.

15 Further, Ridwell requests a partial exemption from WAC 480-70-201 for
16 contracted vehicles (not owned by Ridwell). Ridwell will comply with the sections of this
17 regulation that apply to the Ridwell-owned vehicle. For the Ridwell-owned vehicle,
18 Ridwell will: "(a) Maintain all motor vehicles in a safe and sanitary condition; (b) Ensure
19 that vehicles are free of defects likely to result in an accident or breakdown; and (c) Make
20 vehicles available for inspection by commission representatives." For non-Ridwell owned
21 vehicles, Ridwell will do initial and monthly inspections of vehicles to ensure they are in
22 safe and sanitary conditions and working order. Ridwell can make a selection of these
23 vehicles available for inspection with notice. Ridwell believes that doing so meets the
24 intent to ensure safety in the regulation, while also serving the public interest.
25

DATED this 17 day of January, 2020.

RIDWELL, INC.



Ryan Metzger

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 **Attachment 1: Ridwell 2019 Categories**

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Material	Identified as Recyclable?	Re-used (i.e., take to non-profit donation facility)	Delivered to Entity that will Recycle/Reprocess
Back to School backpacks, alarm clocks, and calculators	N	X	
Non-perishable food	N	X	
Eyeglasses	N	X	
Books	N	X	
Hats, Scarfs, Gloves	N	X	
Halloween candy	N	X	
Pajamas	N	X	
Women's Dress Clothes	N	X	
Travel size toiletries	N	X	
Stuffed Animals	N	X	
Legos	N	X	
Dolls and Action Figures	N	X	
Food takeout utensils	N	X	
Jewelry	N	X	

1	Loose and unused	N	X		
2	diapers				
3	Small kitchenware	N	X		
4	Metal Bottle Caps and	N	X		
5	Pouch Tops				
6	Pet supplies and pet	N	X		
7	toys				
8	Bras	N	X		
9	Bedding, linens, and	N	X		
10	towels				
11	Planter pots	N	X		
12	Wine Corks*	N	X	X	
13	Styrofoam peanuts*	N	X	X	
14	Clothing/Shoes*	N	X	X	
15	Car seats*	N	X	X	
16	Plastic Film	N		X	
17	Household batteries	N		X	
18	Light bulbs	N		X	
19	Small electronics	N		X	
20	Old ID and gift cards	N		X	
21	Styrofoam	N		X	
22	Latex Paint	N		X	

23

24 *Note: these categories are reused if possible and recycled if not. Determination is made

25 by our partners based on the condition of each item they receive from us.