

**CONTINGENCY PLAN
FOR WUTC-JURISDICTIONAL AREAS OF KITSAP COUNTY, WASHINGTON
BY WASTE MANAGEMENT OF WASHINGTON, INC. DBA BREM-AIR DISPOSAL**

INTRODUCTION

In accordance with the Settlement Agreement by and between the Staff of the Washington Utilities and Transportation Commission (“Commission Staff”), Kitsap County, Washington (the “County”) and Waste Management of Washington, Inc. (“WM”) in Docket No. TG-210689, approved by the Commission on March 14, 2022, WM worked with representatives from Commission Staff and the County to develop this Contingency Plan to promptly address a Major Service Disruption in the County caused by a shortage of CDL Drivers.

This document sets forth the policies and procedures for use by WM dba Brem-Air Disposal to identify a Driver Shortage; address a Driver Shortage through recruitment, training and retainment of CDL Drivers; and mitigate impacts of such Driver Shortage on customers and the County (“Contingency Plan”). The policies and procedures set forth in this Contingency Plan are not intended to limit WM’s ability or prerogative to address staffing in Kitsap County in other ways not specified in the Contingency Plan.

GOAL/OBJECTIVE

The goal of the Contingency Plan is to describe the policies and procedures WM will use to identify and effectively address Driver Shortages in the Kitsap Service District and mitigate impacts on WM customers.

DEFINITIONS

“**CDL Drivers**” means drivers holding a valid commercial driver’s license who are fully trained and qualified to service WM collection routes in the Kitsap Service District.

“**Communications Plan**” means the statewide communications and customer outreach plan for WM approved by the Commission in Docket TG-210689.

“**Driver Shortage**” means a Major Service Disruption caused by staffing of CDL Drivers falling below levels sufficient to regularly service all collection routes in the areas of the County served by WM under Commission jurisdiction; provided, however, that a “Driver Shortage” shall not include shortages due to labor disruptions that are the subject of Item 30 in the Commission-approved tariff for WM doing business as Brem-Air Disposal. Staffing of CDL Drivers is considered sufficient when WM has an equal number of CDL Drivers on staff to the number of

CDL Drivers necessary for servicing all Lines of Business, taking into account both route CDL Drivers and floater CDL Drivers available to cover routes.

“Kitsap Service District” means the areas of Kitsap County served by WM under the regulatory jurisdiction of the Commission for solid waste collection services.

“Line of Business” means the applicable category of Commission-regulated commercial, residential, or multi-family solid waste collection service; specifically, municipal solid waste (“MSW”), recycling, or yard waste.

“Major Service Disruption” means a reason other than those listed in Item 30 of WM’s Tariff that prevents or limits WM from collecting MSW, recycling and/or yard waste and that results in losses of scheduled service to customers on at least 20% of Route-Days within any one Line of Business in a Service District (counting separately each successive miss of the same group), where WM has not returned (or expects it will be unable to return) to normal operations across all Lines of Business within three weeks from the first missed services. An interruption must affect at least five total Route-Days to be considered a Major Service Disruption.¹

“Route-Day” means a group of customers within one Line of Business served by one collection vehicle in one day under ordinary operations. Each WM customer is assigned to a particular Route-Day for each Line of Business serving them. The number of customers included in each Route-Day varies by commodity, customer type, and geography, but a typical single-family residential Route-Day may include 500 to 600 customers.

IDENTIFICATION OF DRIVER SHORTAGES

1. The Brem-Air Disposal District Manager shall regularly, but not less than one time per month, review and evaluate the number of CDL Drivers needed to cover routes in each Line of Business in the Kitsap Service District and the current and anticipated staffing levels of CDL Drivers for each Line of Business (taking into account, as applicable, any terminations, resignations, upcoming retirements, vacation seasons, and other similar

¹ For example, a Service District with ten routes for weekly single-family garbage service has 50 Route-Days for that service (ten routes times five days per collection cycle). A complete shutdown of service on one day would be an interruption affecting 10 Route-Days, enough to meet the 20% threshold. If WM anticipated that it could not completely return to normal service within three weeks of that day, the event would constitute a Major Service Disruption, even if only a few customers would still be affected at the end of the three weeks. WM would notify WUTC Staff and the affected county and implement this Communications Plan.

If, instead, service were interrupted on one entire route for two weeks, that would also be an interruption affecting 10 Route-Days under this definition, because the same five daily groups of customers on that route were each missed twice. If WM anticipated that it could not completely restore service within three weeks of the *first* missed service, this would be a Major Service Disruption and WM would implement this Communications Plan.

factors that may impact staffing levels) to identify current or potential Driver Shortages. WM shall also consider any missed services during the same time period. An example of CDL Driver data to be used for monthly review under this paragraph is attached hereto as Exhibit A.

2. In evaluating the number of CDL Drivers needed for each Line of Business in the Kitsap Service District, the Brem-Air Disposal District Manager shall consider the effect of any shifting customer populations and concentrations, new or changed services offered by WM, changes in WM collection equipment, and other changes impacting the number of CDL Drivers needed in the Kitsap Service District.
3. If the monthly evaluation of staffing levels for the Kitsap Service District identifies a current or likely future Driver Shortage:
 - a. WM shall implement the Communications Plan to the extent it has not been already implemented.
 - b. In addition to applicable requirements under the Communications Plan, the Brem-Air Disposal District Manager shall provide pertinent information to the Solid Waste Division Manager for the County related to the Driver Shortage, including but not limited to a description of the Driver Shortage, Line(s) of Business affected, any identified causes of the Driver Shortage, current hiring and new CDL Driver training status and anticipated timeline of the Driver Shortage. Until WM has notified the County that the Driver Shortage has been resolved, the District Manager shall provide regular updates (in no case less frequently than one time per week) to the Solid Waste Division Manager and make themselves available to answer questions and provide further information regarding the future likely Driver Shortage, implementation of this Contingency Plan (including, without limitation, recruitment and hiring efforts and status of drivers in training) and the Communications Plan.
 - c. In addition to requirements under the Communications Plan, WM's WUTC Customer Service Liaison shall provide pertinent information to Commission Staff related to the Driver Shortage, including but not limited to a description of the Driver Shortage, Line(s) of Business affected, any identified causes of the Driver Shortage, current hiring and new CDL Driver training status and anticipated timeline of the Driver Shortage. Until WM has notified the Commission Staff that the Driver Shortage has been resolved, WM's WUTC Customer Service Liaison shall provide regular updates (in no case less frequently than one time per week) and shall make themselves available to Commission Staff

to answer questions and provide further information regarding the future likely Driver Shortage, implementation of this Contingency Plan (including, without limitation, recruitment and hiring efforts and status of drivers in training) and the Communications Plan.

CDL DRIVER RECRUITMENT, TRAINING AND RETENTION

1. Upon identification of a current or likely Driver Shortage, WM shall increase recruitment and hiring efforts to restore sufficient CDL Driver staffing levels in the Kitsap Service District and resolve the Driver Shortage. WM shall promptly take one or more of the following steps to recruit CDL Drivers for the Kitsap Service District:
 - a. Utilize WM internal recruitment resources to post job openings on appropriate websites and in local media;
 - b. Post job openings for CDL Drivers with other WM Puget Sound service districts to identify any CDL Drivers who may be interested in driving in the Kitsap Service District;
 - c. Conduct or participate in job fairs reasonably likely to reach potential CDL Driver candidates; or
 - d. Offer hiring incentives for new CDL Drivers if consistent with then-current WM policies.
2. To recruit new CDL Drivers for the Kitsap Service District, WM shall market its competitive wage and benefits package, CDL Driver training and other benefits consistent with then-current WM policies.
3. All qualified CDL Driver candidates that are offered positions shall be processed through normal pre-employment protocols and requirements in an efficient manner.
4. WM shall schedule CDL Driver training to start for newly hired drivers as soon as possible after onboarding has been completed. Training for newly hired drivers takes approximately 6 to 8 weeks to complete, depending on scheduling and individual training progress. Training consists of 2 weeks of CDL Driver training at WM training facilities in Arizona, followed by approximately 4 to 6 weeks of on-route training with a seasoned CDL Driver on staff at Brem-Air Disposal to ensure new CDL Drivers are able to independently and safely cover routes in the Kitsap Service District.

COMMUNICATIONS WITH CUSTOMERS, COMMISSION STAFF AND THE COUNTY

In addition to the requirements of this Contingency Plan, in the event of a Driver Shortage in the Kitsap Service District, WM shall comply with the Communications Plan.

CUSTOMER CREDITS FOR MISSED SERVICES

WM shall apply credits to customers for missed services during a Driver Shortage in the Kitsap Service District in accordance with the Communications Plan.

EXHIBIT A
Example of Driver Staffing Data for Review

Brem-Air Quarterly Staffing Report as of March 31, 2022 Kitsap County UTC Service Territory*						
Line of Business and Commodity	Drivers Needed			Staffing		
	Drivers to Cover Routes	Floater	TOTAL Needed	# Qualified Drivers Currently Employed	# Drivers in Onboarding/ Training	Variance
Commercial Garbage	4	1	5	4		-1
Commercial Recycle	1	0	1	1		0
Industrial**	6	1	7	6		-1
Residential Garbage	16	2	18	18		0
Residential Yard Waste	2	0	2	2		0
Residential Recycle	11	3	14	15	1***	2
TOTALS	40	7	47	46	1***	0

* This report reflects driver staffing for the service territory within the Commission’s jurisdiction only.

**Compared to earlier information provided by WM, an additional route was added due to increased volume and demand.

***Driver completed training April 8, 2022.