

COMMUNICATIONS AND CUSTOMER OUTREACH PLAN
WASTE MANAGEMENT OF WASHINGTON, INC.

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 statewide communications and customer outreach plan for Major Service Disruptions in WM’s WUTC-jurisdictional areas in Washington State (“Communications Plan”).

Responsible WM personnel, as detailed below, will implement this Communications Plan during Major Service Disruptions in Washington State not otherwise listed in Tariff Item 30. The Communications Plan also provides the public, the Commission and the relevant county with an understanding of what communications to expect from WM in the event of a Major Service Disruption in waste collection services in a Service District, as well as when credits or refunds for missed services will be provided to affected customers during a Major Service Disruption. The procedures set forth in the Communications Plan are intended to explain WM’s communications procedures but are not intended to limit WM’s ability or prerogative to communicate with the public, Commission, and/or county officials in other ways and at other times not specified in the Communications Plan. The Communications Plan is subject to change as appropriate and as agreed between WM and the Commission Staff, including as may be applied to any specific Major Service Disruption.

In addition to events that qualify as Major Service Disruptions addressed by this Communications Plan, WM takes less extensive missed service incidents seriously and strives to respond to and communicate with customers as appropriate to any such event. WM’s collection drivers record individual missed services in WM’s customer database, each of which results in an outbound communication to the affected customer for how and when WM will provide make-up service. It is rare that a customer experiences more than one consecutive missed service unrelated to a more widespread service interruption, but it may occur. When such a customer contacts WM’s customer experience team, WM extends account credits to such customers.

In recent years, WM has developed new practices and procedures to respond to weather events that may interrupt regular collection routes. In late 2021, WM expanded the program to include potential service interruptions for any reason. The internal and external decisionmaking and communication procedures make up part of the individual roles and actions described in this

Communications Plan and represent an expansion and formalization in WM's response, compared to the response to the service disruptions at issue in Docket TG-210689.

GOAL/OBJECTIVE

The goal of this Communications Plan is for WM to make information about a Major Service Disruption in a Commission-regulated Service District available to WM's customers in the Service District, the affected county government affected by the Major Service Disruption, and Commission Staff in the most timely and accurate way reasonably possible, so that those affected can plan for and adapt to the effects of the Major Service Disruption. Additionally, this Communications Plan describes the criteria for when credits or refunds will be provided to customers affected by a Major Service Disruption.

DEFINITIONS

“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

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.

Route-Day varies by commodity, customer type, and geography, but a typical single-family residential Route-Day may include 500 to 600 customers.

“Service District” means the geographical area served by one WM operational district under one tariff for solid waste collection services issued by WM and approved by the Commission. (For example, WM’s North Sound district and Marysville district both provide service under the same tariff, but operate as separate business units with separate pools of drivers and collection equipment.) Areas served under local contract are outside of Commission jurisdiction and not included in “Service Districts” for purposes of this Communications Plan.

“Target audience” is an organization or group of people that is interested in, affected by, or has a need to know about a Major Service Disruption. This Communications Plan defines the following target audiences:

1. WM’s customers in an affected Service District;
2. The Commission; and
3. The government of the county affected by the Major Service Disruption.

RESPONSIBLE WM PERSONNEL

The following WM personnel shall be responsible for implementing this Communications Plan in the event of a Major Service Disruption:

1. Collection District Manager for affected Service District – This individual is responsible for identifying the occurrence or likely occurrence of a Major Service Disruption and coordinating with the Public Sector Manager to implement this Communications Plan and resolve the Major Service Disruption.
2. Operations Lead – This individual is the Collection District Manager or other designee at the affected Service District trained and responsible for initiating WM’s internal processes to send outbound customer communications and coordinating content regarding potential service interruptions on a daily basis with the central WM team that sends outbound messaging.
3. Public Sector Manager for affected Service District – This individual is responsible for sending and receiving communications with the affected county during a Major Service Disruption and will coordinate with Dispatch Manager on any outbound customer communications.
4. Dispatch Manager for affected Service District – After the Operations Lead has initiated the process for outbound messaging and coordinated the content, the Dispatch Manager is responsible for actually initiating outbound service alerts through the WM Alert Center.

5. WUTC Customer Service Liaison – This individual is responsible for sending and receiving communications with Commission Staff during a Major Service Disruption.
6. Area Billing Liaison Manager – This individual is responsible for applying credits to customer accounts in accordance with this Communications Plan.

DETERMINATION OF A MAJOR SERVICE DISRUPTION

The Collection District Manager for each Service District shall continually monitor the provision of service for that district for potential Major Service Disruptions. Upon the discovery of events that constitute or will likely soon constitute a Major Service Disruption in their Service District, the Collection District Manager shall initiate and direct the actions outlined in this Communications Plan.

COMMUNICATIONS PROCEDURES BY TARGET AUDIENCE

1. Washington Utilities and Transportation Commission.

WM's WUTC Customer Service Liaison shall inform the Commission's regulatory services and consumer protection staff by email at servicedisruption@utc.wa.gov no later than the close of business on the next WUTC business day after determining the occurrence or likely occurrence of a Major Service Disruption. Until WM has notified Commission Staff that the Major Service Disruption has been resolved, WM's WUTC Customer Service Liaison shall provide weekly e-mail reports to the Commission with pertinent information regarding the extent of the Major Service Disruption, WM's progress toward resolving the Major Service Disruption, and any communications to the government of the affected county and customers. WM's WUTC Customer Service Liaison shall make themselves available to Commission Staff to answer questions and provide further information regarding the Major Service Disruption, including regarding implementation of this Communications Plan.

2. Affected county.

Unless otherwise agreed between WM and the affected county, a WM Public Sector Manager, Collection District Manager or equivalent position shall notify the representatives for administration of the solid waste program in the affected county by e-mail or telephone no later than the close of business on the next WM business day after determining the occurrence or likely occurrence of a Major Service Disruption in the Service District. Until WM has notified the county that the Major Service Disruption has been resolved, the WM representative shall provide at least weekly e-mail reports to the county with pertinent information regarding the extent of the Major Service Disruption,

WM's progress toward resolving the Major Service Disruption, and any communications to customers and/or the general public, including WM's knowledge management system ("Green Pages") used by WM's customer experience representatives who respond to inbound customer calls. The WM representative shall make themselves available to the county to answer questions and provide further information regarding the major service disruption, including regarding implementation of this Communications Plan.

3. Direct Customer Communications and Education.

Outbound messaging. The WM Dispatch Manager for the affected Service District will initiate WM's automated outbound communications to customers experiencing missed services during a Major Service Disruption via the WM Alert Center as conditions develop. These communications initiated by the Dispatch Manager will be informed by the Operations Lead and overseen by the Collection District Manager. The Alert Center allows dispatch to efficiently send a template message to customers on affected routes in the affected Service District. The template messages are the most efficient method of notifying customers of rescheduled services because they are already formatted and can be initiated quickly. In general, WM will make outbound communication of individual missed services during a Major Service Disruption as provided in this section. However, the causes and progress of Major Service Disruptions may be unique and unforeseeable, so WM may vary these procedures depending on circumstances.

The Operations Lead initiates the outgoing communications protocol for affected collection routes by 7:00 a.m. WM's designated message team will then vet the request, confirm any details with the Operations Lead if needed, and forward proposed outbound messaging to a designated internal approver, as well as to the affected Collection District Manager for visibility. If no corrections are needed, the approver authorizes the communications and notifies the relevant WM personnel through a pre-established internal distribution list for the Service District. As appropriate to each Service District, this distribution list typically includes the Operations Lead, Dispatch Manager, Public Sector Manager, customer experience (WM corporate call center) team, and appropriate directors for the Pacific Northwest area. .

If the extent of service interruptions for a particular day is not known by noon, then by the end of the day WM will send outbound communications regarding recovery plans to all customers in affected areas.

If a customer previously selected a preferred method of receiving information from WM (telephone, e-mail or text message ("Direct Customer Communication Channels")), then

template messages regarding rescheduled services will be sent in accordance with the customer's preferred Direct Customer Communication Channel. If a customer has not selected a preferred method of information from WM, the message will default to either the e-mail address or the phone number on file for that customer. No text messages are sent to customers unless the customer has registered to receive text messages from WM.

WM will initiate messages to affected customers as early as possible. WM will aim to service as many customers as possible on their regular service day, and as a result, WM may not know all rescheduled customers until the end of the day if certain routes are not able to be completed.

Inbound inquiries. For customers seeking information, wmnorthwest.com is the source with the most up-to-date information for inbound inquiries. When WM initiates the event response procedures for outbound communications described above, WM will also update wmnorthwest.com with the service alert for the affected area(s), typically by 8:30 a.m. for messaging initiated before 7:00 a.m. When the extent of service interruption for a day is not known by noon (as described above under "outbound messaging"), service alert / recovery messaging on wmnorthwest.com will generally be updated by 7:00 a.m. the following day. When appropriate, WM will develop and post customized messaging on the wmnorthwest.com page for the affected Service District regarding the Major Service Disruption (most likely if the cause or progress of the Major Service Disruption is especially unusual or unclear to the public). WM will coordinate such potential messaging with Commission Staff and the affected county, recognizing that customized messaging is slower to develop and publish than standardized service alerts.

Customers are able to contact WM's customer experience representatives at (800) 592-9995 for individualized information. Because WM's internal email distribution lists include customer experience team members, the Service District experiencing the Major Service Disruption will provide up-to-date information to the customer experience representatives regarding the Major Service Disruption, including the routes affected, cause of the Major Service Disruption and estimated duration. For customers who wish to receive information in a language other than English, WM utilizes a service that provides translators in over 100 languages.

Live chat and e-mail with customer experience representatives also are available to customers during business hours via the wmnorthwest.com website. These services will allow customers to obtain information for their account and service district.

WM.com does not currently have the capability of presenting the details of service alerts. When there are active service alerts, WM notifies the corporate website team, which adds a banner on wm.com noting the general area of the service interruption and linking to wmnorthwest.com, where the most detailed information is available.

Customer education. At least annually, WM shall develop and distribute a targeted educational insert to include with customers' invoices that details how customers can select preferences for Direct Customer Communication Channels.

4. General Public.

WM does, and will, provide timely and accurate service information on the wmnorthwest.com website for the applicable Service District, as described above.

If a Major Service Disruption affecting 20% or more of customers within a Service District lasts longer than four (4) weeks, WM will use appropriate public communication channels for the service district to provide information on the major service disruption, including the cause of the major service disruption, the steps WM is taking to resolve the major service disruption, and the anticipated timeline for resolution. Appropriate public communication channels will vary by Service District, but can include newspapers of general circulation in the area, newsletters, press releases or similar news or social media. WM may confer with the county for the Service District on the appropriate public communication channels.

CUSTOMER CREDITS FOR MAJOR SERVICE DISRUPTIONS

1. During a Major Service Disruption, for each Line of Business under which each customer experiences a missed service, WM shall collect all accumulated garbage, recycling, or yard waste (as applicable) set out by the affected customer at the customer's next service date after service resumes to such customer. WM shall not charge customers with missed collection services for extra waste set out in addition to customers' normal receptacle(s), if the amount of extra waste does not exceed the amount that reasonably would be expected to accumulate due to missed service and is set out reasonably in accordance with WM guidance posted at servicealerts.wmnorthwest.com.

"Reasonably would be expected to accumulate due to missed service" means, at a minimum, the amount of solid waste represented by the number of missed service(s) multiplied by the customer's subscribed service level. For example, if the company

misses two services for a customer who subscribes to one 96-gallon toter, the amount would be the equivalent of 192 gallons (2 services x 96 gallons per service).

2. WM is not obligated to extend credit to missed customers who experience up to two missed services during a Major Service Disruption if WM collects the customers' accumulated material under the affected Line(s) of Business as required under (1) above. If WM does not collect all of a customer's accumulated material as required under (1) above, or if a customer experiences more than two missed services across all Lines of Business during a single Major Service Disruption, WM is required to give a credit to the customer, proportionate to the customer's monthly service charge and calculated as described in (4) below, for each missed service after the second missed service until normal service is restored.
3. How to calculate a credit: Monthly residential service rates are set based on 4.33 services per month for weekly service and 2.17 services per month for every-other-week service. For each missed service experienced by a customer requiring credit under Paragraph 2 above, the credit is calculated as either .231 for weekly services (1 missed service divided by 4.33 services per month) or .461 for every-other-week services (1 missed service divided by 2.17 services per month, for every-other-week service), multiplied by the service-related component of the monthly rate for such service (excluding disposal and processing costs); provided that the credit for any specific month does not exceed the full rate per month. Any customer credits for missed recycling services will include the recycling commodity credit.
4. Nothing in this Communications Plan shall limit WM's authority to issue credits under WAC 480-70-391.