

- (a) How much of the revenue is derived from residential services within Missoula County?
- (b) How much of the revenue is derived from commercial services within Missoula County?
- (c) Provide the same revenue information for the years 2015 and 2016 for Republic in Missoula.

ANSWER:

Republic objects to this Data Request as improper because the discovery sought seeks to shift the burden away from the Applicant and onto Republic, although it is the Applicant's burden to demonstrate that it is entitled to the applied-for certificate of public convenience and necessity. Republic further objects to this request on the basis it seeks confidential, trade-secret business information, which is irrelevant to this docket, and asks competitors to share pricing information in violation of anti-trust laws.

DATA REQUEST L&L-003:

RE: Republic's Missoula Rate Schedule

Please provide Republic's rate schedule for residential customers in Missoula County for 2015, 2016 and 2017, as well as Republic's current rate schedule in Missoula County.

ANSWER:

Republic objects to this Data Request as improper because the discovery sought seeks to shift the burden away from the Applicant and onto Republic, although it is the Applicant's burden to demonstrate that it is entitled to the applied-for certificate of public convenience and necessity. Republic also objects to this Data Request as irrelevant to the pending docket, as the Commission does not regulate rates for Class D carriers. Republic further objects to this request on the basis it seeks confidential, trade-secret business information, and asks competitors to share pricing information in violation of anti-trust laws.

DATA REQUEST L&L-004:

RE: Republic's Missoula Customer Contracts

(a) Please provide Republic's current contract or terms and conditions for residential customers in Missoula County.

(b) Please provide Republic's current contract or terms and conditions for commercial customers in Missoula County.

(c) Please Provide Republic's current contract or terms and conditions for industrial customers in Missoula County.

(d) Please explain the criteria Republic uses to characterize customer classes in Missoula County, and provide the names of any classes of service in addition to residential, commercial, and industrial.

ANSWER:

Republic objects to this Data Request as improper because the discovery sought seeks to shift the burden away from the Applicant and onto Republic, although it is the Applicant's burden to demonstrate that it is entitled to the applied-for certificate of public convenience and necessity.

DATA REQUEST L&L-005:

RE: Republic's Missoula Residential Customers

Please provide the current number of Republic's residential customers in Missoula County. Please also provide the number of residential customers Republic had in 2015, 2016 and 2017.

ANSWER:

Republic objects to this Data Request as improper because the discovery sought seeks to shift the burden away from the Applicant and onto Republic, although it is the Applicant's burden to demonstrate that it is entitled to the applied-for certificate of public convenience and necessity.

DATA REQUEST L&L-006:

RE: Republic's Missoula Service Denials

Please identify every person, business or entity in Missoula County that requested service from Republic and was denied service since January 1, 2015. For each such person, business or entity, please identify:

- (a) the type of service requested;
- (b) the identity of the person, business, or entity that was denied service;
- (c) the date service was requested;
- (d) whether such request was in writing, by phone, or communicated by some other

means;

- (e) the identity of the Republic employee contacted for service; and
- (f) any reasons given for denying service.

ANSWER:

Republic objects to this Data Request as improper because the discovery sought seeks to shift the burden away from the Applicant and onto Republic, although it is the Applicant's burden to demonstrate that it is entitled to the applied-for certificate of public convenience and necessity.

DATA REQUEST L&L-007:

RE: Republic's Missoula Customer Complaints

Please identify every person, business, or entity in Missoula County that complained, whether in writing or verbally, about the type, quality, or rate charged for service in any form from Republic at any time since January 1, 2012. Your response should include the following information:

- (a) The person making the complaint;
- (b) The address that service was provided to;
- (c) The phone number of the person making the complaint; and
- (d) A description of the complaint;
- (e) A description of Republic's response to the complaint, if any; and
- (f) Provide a detailed description of the source of the foregoing information supplied in response to this Data Request.

For purposes of this question, the term "complaint" means an expression of dissatisfaction with service, whether received verbally or in writing.

ANSWER:

Republic objects to this Data Request as improper because the discovery sought seeks to shift the burden away from the Applicant and onto Republic, although it is the Applicant's burden to demonstrate that it is entitled to the applied-for certificate of public convenience and necessity.

DATA REQUEST L&L-013:

RE: Republic's Missoula Employees

Please provide the number of people Republic directly employs in Missoula County?

Please identify each Republic employee in Missoula including their job title and the length of time with the company. Please also provide the number of people Republic directly employed in Missoula County in 2015, 2016, and 2017.

ANSWER:

Republic objects to this Data Request as overly broad, unduly burdensome, irrelevant, and not calculated to lead to the discovery of admissible evidence. Republic has employees in other operations, such as recycling and landfill operations, that are not related to this case.

DATA REQUEST L&L-015:

RE: Republic's Missoula Employees

Describe any communications, including meetings, trainings, or documents distributed to Republic's Missoula employees regarding this Application, the Montana Public Service Commission, or competition in the trash collection business in Montana.

ANSWER:

Republic objects to this Data Request as overly broad, unduly burdensome, irrelevant, and not calculated to lead to the discovery of admissible evidence. In addition, Republic objects that this Data Request is vague and ambiguous as Republic is unclear what Applicant meant by "competition in the trash collection business." In addition, training materials are confidential and trade secret.

Dated this 30th day of April, 2018.

/s/ Hannah E. Tokerud

William W. Mercer

Hannah E. Tokerud

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ATTORNEYS FOR ALLIED WASTE
SERVICES OF NORTH AMERICA, LLC,
D/B/A REPUBLIC SERVICES OF
MONTANA

CERTIFICATE OF SERVICE

I certify that on the 30th day of April, 2018, Objections of Allied Waste Services of North America, LLC, d/b/a Republic Services of Montana to L&L Site Services, Inc.'s Data Requests were e-filed with the Commission and served via U.S. mail and e-mail, unless otherwise noted, to the following:

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