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*Attorneys for Big Foot Dumpsters & Containers, LLC*

IN THE MATTER OF Big Foot Dumpsters & Containers, LLC Application for Certificate of Public Convenience and Necessity	Regulatory Division  Docket No. T-18.2.PCN
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**BIG FOOT DUMPSTERS & CONTAINERS, LLC DATA REQUESTS TO  
REPUBLIC SERVICES OF MONTANA**

Big Foot Dumpsters & Containers, LLC (“Big Foot”), by and through counsel BRYAN, DISTEFANO & MATTINGLEY, PLLP, pursuant to the procedural order of the Montana Public Service Commission (“PSC” or “Commission”), submits the following data requests to Protestant

Pursuant to the Montana Rules of Civil Procedure, Big Foot requests Republic answer the following Data Requests in writing and under oath by April 9, 2018 as required by the PSC’s Procedural Order. Amended or supplemental answers to these Data Requests, as required by Mont. R. Civ. P. 26(e) are also requested and should be served and filed at any later date, but in any event, no later than 14 days prior to the hearing set to commence in this matter.

**BIG FOOT – 001                      Re: Persons with information**

Please state the name, current address, telephone number and job title of all persons who aided in the preparation of the answers to these data requests.

**RESPONSE:**

**BIG FOOT – 002            Re: Revenue**

Provide complete detail regarding the revenue figures provided in the protest form dated February 12, 2018. In other words, please describe the source of the \$488,406.00 and explain how the number was derived.

**RESPONSE:**

**BIG FOOT – 003            Re: Rate schedule**

Please provide Republic's current rate schedule for residential and commercial customers in the service area that is the subject of this proceeding.

**RESPONSE:**

**BIG FOOT – 004            Re: Customers**

Please provide the number of residential and commercial customers for which Republic provides door-to-door garbage hauling services in the service area that is the subject of the proceeding.

**RESPONSE:**

**BIG FOOT – 005            Re: Customers**

Please provide the number of customers Republic has services with regard to hauling construction debris in the service area that is the subject of this proceeding for 2018, 2017, 2016, and 2015.

**RESPONSE:**

**BIG FOOT – 006            Re: Customers**

Please identify every person, business or entity in the pertinent area 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 individual; (c) the date service was requested; (d) whether such request was in writing, by phone, or communicated by some other means; (e) the Republic employee contacted; and (f) any reasons given for denying service.

**RESPONSE:**

**BIG FOOT – 007            Re: Complaints**

Please identify every person, business, or entity in the pertinent area 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, 2013. 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 and Republic's response.

**RESPONSE:**

**BIG FOOT – 008            Re: Customers**

Please identify every Republic customer in the pertinent area who discontinued service with Republic since January 2015.

**RESPONSE:**

**BIG FOOT – 009            Re: Revenue**

In Republic's Protest to Application for Intrastate Certificate of Public Convenience and Necessity dated February 12, 2018, Republic listed \$488,406.00 in revenue derived from customers in the specific service area

during the past year. Please describe how much of that revenue is derived from hauling construction debris.

**RESPONSE:**

**BIG FOOT – 010            Re: Revenue**

In Republic's Protest to Application for Intrastate Certificate of Public Convenience and Necessity dated February 12, 2018, Republic listed \$488,406.00 in revenue derived from customers in the specific service area during the past year. Please describe how much of that revenue is derived from commercial customers that Republic provides garbage hauling services.

**RESPONSE:**

**BIG FOOT – 011            Re: Revenue**

In Republic's Protest to Application for Intrastate Certificate of Public Convenience and Necessity dated February 12, 2018, Republic listed \$488,406.00 in revenue derived from customers in the specific service area during the past year. Please describe how much of that revenue is derived from residential customers that Republic provides garbage hauling services.

**RESPONSE:**

**BIG FOOT – 012            Re: Rates**

Is the presence or absence of a competitive service a consideration in the pricing of Republic's services to a commercial, residential, industrial, or construction debris customer in Flathead County?

**RESPONSE:**

**BIG FOOT – 013            Re: Witnesses**

Please identify by name, address, and telephone number each witness you may call at the scheduled hearing in this matter and describe the expected testimony of each witness.

**RESPONSE:**

**BIG FOOT – 014            Re: Witnesses**

If Republic, or anyone acting on its behalf, has retained or conferred with any expert witness concerning the application or protest who is expected to be called as an expert witness at any hearing, please state:

- a. The subject matter on which each such expert is expected to testify;
- b. The substance of the facts and opinions to which each such expert is expected to testify; and
- c. A summary of the grounds for each such opinion.

**RESPONSE:**

**BIG FOOT – 015            Re: Evidence**

Please identify all documents or other tangible evidence you intend to introduce as exhibits or otherwise rely upon for any purpose at the hearing in this matter.

**RESPONSE:**

**BIG FOOT – 016            Re: Authority**

Please identify the PSC authority granted to Republic and the date the authority was granted.

**RESPONSE:**

**BIG FOOT – 017            Re: Marketing**

Please describe all marketing activities of any kind (eg., newspaper advertising, yellow page ads, telemarketing, web-based marketing or sales activities of any type whatsoever) that Republic engaged in in 2016, 2017, and 2018 in the area that is the subject of this Application.

**RESPONSE:**

**BIG FOOT – 018            Re: Equipment**

Please list all the equipment owned by the company. Your response should include make, model, model year, size, and a brief description of each piece of equipment to include but not limited to all vehicles, trailers, dumpsters, and containers.

**RESPONSE:**

**BIG FOOT – 019            Re: Employees**

How many employees are currently working for the company in the pertinent service area? Please identify each employee including their job title, the length of time with the company, and any special licenses the employee holds including but not limited special endorsements on their drivers' license.

**RESPONSE:**

**BIG FOOT – 019            Re: Customers**

How many active customers does Republic currently provide garbage hauling services to in the pertinent service area for:

- a. Commercial
- b. Residential
- c. Industrial
- d. Construction debris

Your response should include the number of customers in the area using: (1) roll-off containers; (2) front load containers; and/or (3) small totes; (4) and the size of said container.

**RESPONSE:**

**BIG FOOT – 020            Re: Business relationships**

Please identify any and all existing relationships between Republic, Evergreen Disposal, Inc., and Montana Waste Systems, Inc. d/b/a North Valley Refuse. Included in this request is a request for disclosure regarding Republic or its members' ownership or other interest in any of the previously listed entities.

**RESPONSE:**

**BIG FOOT – 021            Re: Contracts**

Please produce any exclusive or nonexclusive contracts for hauling services from 2015 to present.

**RESPONSE:**

**BIG FOOT – 022            Re: Protests**

Please identify every protest Republic has filed with the Public Service Commission from 2000 to present, including (a) the applicant identity, (b) the authority applied for, (c) the reason for protest, and (d) the outcome of the protest.

**RESPONSE:**

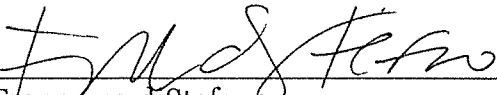
**BIG FOOT – 23            Re: Evidence**

Please produce any documents that support your responses to any request set forth herein not previously disclosed.

**RESPONSE:**

DATED this 19 day of March 2018.

Bigfoot Dumpsters and Containers, LLC  
BRYAN, DISTEFANO & MATTINGLEY,  
PLLP

  
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Francesca diStefano



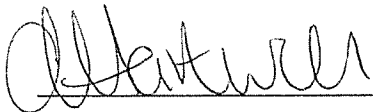
CERTIFICATE OF SERVICE

I hereby certify that on March 15<sup>th</sup>, 2018, a copy of the foregoing document was served on the following persons by the following means.

Hand delivery  
 Mail  
 Overnight Delivery  
 E-mail

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Attorney for Evergreen Disposal, Inc.

  
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