

Refuse Rates Administrator's (RRA) response to Recology's initial refuse rate change request (submitted March 7th, 2023)

Weekly update dated 4/07/23

This document is an update to the RRA's prior response letters and includes only the request items which have been shared with Recology to-date in the shared Questions And Requests workbook. As discussed in previous meetings, the RRA will accept submissions not broken out by the Audited Financial cost centers, and ratepayer class will be based on fee schedule breakout. The RRA's initial and subsequent reviews of the Recology March 7th submission identified 23 missing or incomplete schedules and 8 simplified schedules out of 42 total. This update identifies current missing or incomplete schedules as well as additional exhibits which will be necessary for the RRA to conduct analyses which lead to recommendation on future rates. This update also details any additional submissions or clarifications provided by Recology. Recology has not yet submitted any of the requested exhibits. The RRA has requested that Recology inform them as to when the complete submission can be expected, as the timing by which it is submitted will impact the timeline of the rate review and the RRA's ability to produce a recommendation based on the information available.

This document contains the following tables:

- Table 1. Status of Rate Change Request Schedules
- Table 2. Supporting Exhibits
- Table 3. Line Item Questions
- Table 4. Environment Department Exhibits Request
- Table 5. Environment Department Deliverables Request
- Table 6. Environment Department Reports
- Table 7. Abbreviations or Acronyms

Item	Request date	Schedule	Current Status	Initial Status	RRA Notes	Response Date	Recology Timing Response
							Provided 4/2/2023 response: "As discussed with the Refuse Rate Administrator during the development of the Refuse Rate Change Request forms, the allocation of costs and other information between residential, apartment and commercial customers is being deferred. We agreed that allocation is not possible at this time due to the integrated nature of operations, the need to update Recology's underlying data collection and the need to develop agreed upon allocation methodologies and models. Apart from billed revenue, which is organized by customer class due to differing rate structures, all other rate activity, including all costs, is presented in aggregate, without separation by customer class."
1.01	3/24/2023	A.2 Total Sources and Uses	In Review	Incomplete	Breakdown of Total Uses needed. Missing Residential Multi-Family, 5 units or less.	4/2/2023	
1.02	3/21/2023	C.1 Ratepayer Revenue	In Review	Validate	Reconcile commercial revenue with rate reports (i.e. debris box?)		
1.03	3/15/2023	C.2 Waste Collection Revenue Detail	Missing	Missing	Recology has said they will be able to provide this schedule		Will provide April 3-7
1.04	3/21/2023	C.3 Other Ratepayer Revenue	Missing	Missing	Include line-item for Contamination Fees		Will provide April 3-7
1.05	3/15/2023	D.2 Revenue Offsets	Missing	Missing			
							Provided 4/2/2023 response: "As discussed with the Refuse Rate Administrator during the development of the Refuse Rate Change Request forms, the allocation of costs and other information between residential, apartment and commercial customers is being deferred. We agreed that allocation is not possible at this time due to the integrated nature of operations, the need to update Recology's underlying data collection and the need to develop agreed upon allocation methodologies and models. Apart from billed revenue, which is organized by customer class due to differing rate structures, all other rate activity, including all costs, is presented in aggregate, without separation by customer class."
1.06	3/24/2023	D.3 Recycling Revenue	In Review	Incomplete	Revenue by Customer Type missing, i.e., rows 34-78. Actuals would have to exist in order to have done accurate billings.	4/2/2023	
							Provided 4/2/2023 response: "As discussed with the Refuse Rate Administrator during the development of the Refuse Rate Change Request forms, the allocation of costs and other information between residential, apartment and commercial customers is being deferred. We agreed that allocation is not possible at this time due to the integrated nature of operations, the need to update Recology's underlying data collection and the need to develop agreed upon allocation methodologies and models. Apart from billed revenue, which is organized by customer class due to differing rate structures, all other rate activity, including all costs, is presented in aggregate, without separation by customer class."
1.07	3/24/2023	D.4 Disposal Revenue	In Review	Incomplete	All but 2 rows missing from rows 13-129	4/2/2023	
1.08	3/24/2023	D.5 Processing Tonnage	In Review	Incomplete	Rows 46-48 Missing, and important for policymaker and public sightline, to know the impact on the Landfill Disposal Agreement's time-to-cap exceedance.	4/5/2023	Provided 4/5/2023
1.09	3/15/2023	D.6 Toxics Collection	In Review	Incomplete	RY23-RY25 projections not included. Recology has said they will be able to provide projections.	3/16/2023	Recology provided RY23-25 HHHW tonnage and collections
1.1	3/15/2023	E.1 Operating Expense Summary	Missing	Missing			Will provide April 3-7
1.11	3/15/2023	F.1 Service Apportionment	Missing	Missing	Recology has said they are working on a cost allocation methodology and will provide		Will provide April 3-7
1.12	3/15/2023	G.1 Refuse Collection Detail	In Review	Incomplete	Identification of Fixed/Variable cost, and Combined and Eliminations columns are missing. Include columns to disaggregate RSF from SS/GG	3/28/2023	Recology provided revised refuse collection detail allocated to RSF and SS/GG, not by audit expenditure category.
1.13	3/15/2023	J.3 Depreciation Expenses	In Review	Incomplete	Actuals are missing	3/28/2023	Recology provided actuals
1.14	3/15/2023	K.1 Insurance Expenses	Incomplete	Incomplete	Recology submitted cost of coverage actuals on 4/3. RRA has requested written response for type of coverage, incurred vs. claims made, and value of coverage. Recology verbally conveyed all insurance is claims-made, that D&O insurance from 2020-2021 is not included as a cost for rate payers. Recology will adjust the value column to say "limit of coverage" and complete.	4/3/2023	Initial provided 4/3/2023
1.15	3/15/2023	L.2 Intercompany Processing	In Review	Incomplete	Some categories of recyclables are missing	4/2/2023	Provided 4/2/2023
1.16	3/15/2023	O.1 Professional Services Expenses	Incomplete	Incomplete	FTE and performing and requesting companies are missing		Recology will provide by March 24th
1.17	3/15/2023	O.2 Corporate Services Expenses	In Review	Incomplete	FTEs for RY20 and RY21, as well as all years for performing and requesting companies are missing	4/5/2023	Provided 4/5/2023

Item	Request Date	Exhibits	Current Status	Initial Status	Notes	Response Date	Recology Timing Response
2.01	3/15/2023	Outreach	Missing	Missing	What are current services and costs associated with outreach. What changes to outreach are being made, and what are the associated cost changes?		
2.02	3/15/2023, amended 3/31/23	Abandoned Materials Collection	Missing	Missing	What is the current level of service for abandoned materials collections and what are the associated costs? What changes to abandoned materials collections are being made and what are the associated costs? How were decisions made to propose enhanced service?		
2.03	3/15/2023, amended 3/31/23	Increased "City can" service	Missing	Missing	What is the current level of service for "City can" service and what are the associated costs? What are the current routes and schedules for "City can" service and how will this change? What are the associated cost changes? How were decisions made to propose enhanced service?		
2.04	3/15/2023	Changes to FTE count	Missing	Missing	Please specify what the additional FTE will support.		
2.05	3/15/2023	List of Fees and Charges	Missing	Missing	Please provide list of all fees and charges. Please identify any fees not included in one of the 6 rate schedules		
2.06	3/15/2023	Pension Costs	Missing	Missing	For the 2 year rate period, please explain what the annual cost is assumed for the cash-funded portion of the pension contribution, and what it is by month for each of the 24 month periods.		
2.07	3/21/2023	Contamination Fees	Missing	Missing	Please provide current charges and procedures as well as proposed charges and procedures outlining changes, identify impacted populations and impact to customer waste collection costs.		
2.08	3/31/2023	Balancing Account	Missing	Missing	Please provide a justification for the proposed 100% adjustment for the difference between actual net profits or losses.		
2.09	3/31/2023	Sustainable Crushing at Pier 94	Missing	Missing	Please describe the service provided at Pier 94. What are the associated costs with this service? What are the impact to revenues and costs related to this closure? What are the impacts to labor needs and other material needs related to this closure?		
2.10	3/31/2023	Programs included in proposed rate (Programs 4-29 in Narrative Summary)	Missing	Missing	Please provide current and proposed labor and costs associated with these programs.		Recology to assess what data is available and had planned to respond on April 5th with understanding of limitations/ability
2.11	4/4/2023	Cost Accrual Basis	Missing	Missing	Please provide a summary of which costs have been and are proposed to be: 1) (Full) Accrual Basis, 2) Cash Basis, or 3) Otherwise, e.g. Modified Accrual Basis (along with the recognition period, if modified accrual, i.e., 30-days following the FY end, 60-days, etc.).		
2.12	4/4/2023	Profit on Equipment Purchasing vs. Leasing	Missing	Missing	Please explain why certain assets are being depreciated (Full Accrual Basis Cost) vs. others like equipment are Leased-to-Own (Cash Basis). What is Recology's policy to lease or to own? For leased-to-own, is Recology Leasing earning a profit on the assets and is Recology SS/GG also earning a Profit Margin on the cash-basis lease cost charged to them by Recology Financing or other Recology entities? What is the difference in cost for leasing equipment from Recology entities plus profit margin on lease profit for Recology entities compared with Recology SS/GG directly purchasing equipment and then depreciated over the useful life of 7-10 years?		
2.13	4/4/2023	Basis for Revenue Offsets	Missing	Missing	What is the basis for assumed revenue offsets? Please detail which market analyses and pricing sources are being used and assumed by Recology for revenues associated with Organics, Recyclables, etc. to ensure SF Ratepayers are benefitting from and having some costs of service covered by those parts of the waste stream? How do Recology revenue offset prices for these products compare with competitors in California?		
2.14	4/6/2023	AUP	Missing	Missing	AUP expected Monday April 17		

Request Date	Number	Exhibits	Notes	Response Date	Recology Timing Response
3/22/2023	1	Detail on proposed new composting contamination removal processing at the West Wing, including equipment specs, layout, any additional labor, projected material type and tons of contamination removed and impact on net recovery of compostables.			
3/22/2023	2	Contamination Charge & Removal of Recovery/Diversion Discount Protocol, including details on the streamlined process to automate the quality assurance review and communication processes referenced in the Summary of Assumptions. What assumptions are associated with the \$5 million revenue?			
3/22/2023	3	Detail on Commercial Bulky Item collection service offered and assumed for rate calculation including frequency by generator type and level of recovery. SFE understands from Waste Zero staff that this service is currently available to SF businesses.			
3/22/2023	4	Organizational chart for RSS, RSF, and RGG, including Waste Zero staff.			
3/22/2023	5	Explain assumptions and justification in tonnage and recovery projections and reason for changes, such as lower residential composting received and lower % diverted, that is shown in Schedule D.5. The % diverted for recycling needs to be corrected as it currently shows % disposed not diverted.			
3/22/2023	6	Abandoned Materials Collection assumptions on tonnage and additional services referenced in the Narrative.			
3/22/2023	7	Event rate schedule and clarification that no events receive free service.			
3/22/2023	8	Trash processing test net costs with avoided Hay Road disposal cost offset and state goal after test to develop plan with SFE for scaling trash processing in subsequent rate process.			

Category	New activity as of October 2023	Task Oct 2023-Sept 2025	Sector	Exhibit associated
Collection	No	Deliver kitchen pails for all residential and apartment building service starts and upon request.	All Residential	
Collection	Yes	Maintain inventory of gravity bins and locked bins so that any commercial, residential or event customers may request 96 gallon landfill and/or 64 gallon compost and/or recycle service in gravity bin with no more than a two week delay. Experience shows that unlocked bins contribute to contamination and contamination changes have been overturned in an appeal due to lack of locked bins.	All	
Collection	Yes	Plan, promote, staff and execute District Clean-Up Events annually in each supervisor district. Include services to maximize recovery and reuse including all three streams (recycle, landfill, compost), household hazardous waste (light bulbs, batteries, appliances, sharps, lamps, etc.) and a reuse component such as partnering with Goodwill to refurbish working computer monitors.	All Residential	
Collection	Yes	Bulky Item recycling (RecycleMyJunk)- Single family (1-5 units) receives two free pick-ups per year, apartment and commercial rate apartment residents receive one free pick up per year, property managers receive one free pick up per year. Work with SFE to determine a plan to improve recovery.	Residential	
Contamination	Yes	Publish a clear and concise summary of the contamination charges and methods to avoid/remove them translated into Spanish, Filipino and Traditional Chinese. Distribution avenues will include website, newsletter, direct mail and provided upon request through customer service.	All	
Contamination	Yes	Implement consistent contamination charges throughout SF apartment and commercial rate customers per a mutually-agreed upon protocol and phased-in approach with SFE. Begin the first year with commercial and apartment rate accounts w/o compactors and between 2 cy and 40 cy.	Apartment & Commercial	
Contamination	No	Conduct required RSO audits of affected large refuse generators as mutually agreed with SFE.	Apartment & Commercial	
Contamination	No	Improve route monitoring by drivers with full utilization of test camera technology to monitor every container that is unloaded.	All	Yes
Contamination	No	Perform waste evaluations per the container contamination minimization requirements of SB 1383 Section 18984.5(c) twice annually and report outcomes to the City as mutually agreed	All	
Contamination	No	Contact every Commercial and Apartment account with contamination charge or removal of diversion discount at least once a year. First attempt to contact by email or phone, then send letter to the account if not able to reach anyone. Escalate charges as mutually agreed upon.	Apartment & Commercial	
Hazardous Waste	Yes	Fully integrate electronic manifesting for all shipments to off-site disposal facilities for Hazardous Waste.	All	
Hazardous Waste	Yes	Provide outreach to property managers, associations, and buildings on battery collection safety issues and identification of "high hazard" batteries [in conjunction with removal of existing orange battery collection containers?]	Apartment	
Hazardous Waste	Yes	Provide outreach to MFD residents on identification of "high hazard" batteries and battery recycling options [in conjunction with removal of existing orange battery collection containers?]	Apartment	
Hazardous Waste	Yes	Fully integrate electronic manifesting for all shipments to off-site disposal facilities.	All	
Hazardous Waste	Yes	Add Spanish and Chinese language options to Household Hazardous Waste voicemail (830-1405)	All Residential	
Outreach	No	Outreach to all new accounts, prioritizing customers whose service reflects 50% or less recovery rate.	All	
Outreach	No	Provide printing & distribution every year for residential zero waste outreach mailer promoting what-goes-where, bulky item pickup program, household hazardous waste collection, and generation reduction strategies, alternating between apartment residents (6+ units) and single family (1-5 units). SFE will lead on the design of the outreach by working with SFE's contractors and Recology will pay for printing and mailing of outreach materials.	All Residential	
Outreach	No	Provide regular virtual and in person trainings to property management companies, associations, and buildings. Offer on a monthly basis, customized per audience with a virtual option as well as upon request by customers.	All	
Outreach	No	Engage the waste zero champions with quarterly events	All	
Outreach	Yes	Revise bills to show clearly rate structure and incentive calculation. Publish a website an updated rate calculator for both residential and small, FEL commercial customers outlining the services available	All	
Outreach	Yes	Develop in collaboration with SFE and print/publish a consolidated commercial services brochure and accompanying web/app content, including: Rate calculator for small, FEL commercial customer, Cardboard options, Updated 'what bin' resource for commercial customer materials, Detailed set-out guidelines, Additional services such as locking and indoor services, Methods to discourage illegal dumping/scavenging (including gravity bin options), Contamination charges and how to avoid/remove them, VSQG program and other options for hazardous waste removal, Options for bulky item disposal	Commercial	
Outreach	Yes	Contact all new Apartment and Commercial accounts at least once that subscribe to 2 cubic yards or more weekly refuse service and whose recovery rate (AKA diversion discount) is 50% or less to offer service that reflects at least 67% recovery.	Apartment & Commercial	
Outreach	Yes	Provide SB 1383-qualified compost, transportation and staffing to distribute compost at four events annually for a total of at least 80 cubic yards annually, distributed at the direction of SFE.	All	
Outreach	No	Provide at least 1,250 Commercial and 600 apartment building accounts (defined by SIC code) with one or more assists annually (e.g., site visit, presentation, phone exchange, email or letter offering outreach, outreach materials sent, self-assessment forms completed, waste zero champion sign-up, service level recovery improvement), captures data on zip code and language served for assists, and submits a list of Commercial and Apartment accounts assisted quarterly.	Apartment & Commercial	
Outreach	No	Communicate the source separation requirements to all new accounts. Contact all new Apartment and Commercial accounts at least once that subscribe to 2 cubic yards or more weekly refuse service and whose recovery rate (AKA diversion discount) is 50% or less to offer service that reflects at least 67% diversion.	All	
Processing	Yes	Recology will deliver 1200 tons of SF representative trash to Waste Management (WM)organics material recovery facility (OMRF) in San Leandro, CA for trash processing test. WM will provide a San Francisco material only test in both the OMRF and the Organics Material Composting Facility (OMCF). WM will also provide analysis of the recoverable material and composting quality of end	All	Yes
Reporting		Reporting as outlined in separate communications to controller.	All	

#	Title	Criteria	Purpose	Template (Y/N)	Frequency	Current rate report connection
1	Annual HHW Report	Form 303 data (weights and disposition by type by program), Retail Site weights by type and site, zip code summary for Facility Drop-off and Home Collection Service	Required by CalRecycle to report collection numbers by program and waste type	Y	Quarterly	Table 5
2	Table 3	All information in the template	Used to reconcile disposal for CalRecycle Electronic Annual Report (EAR) and generation studies	Y	Annually	N
3	Apartment & Commercial rate customer information	AR and Altar accounts	Used to update our CRM service information and provide direct technical assistance for compliance with source separation and adequate service. All account information from AR and ALTAR services in one row.	Y	Monthly	Table 4
4	Commercial & Apartment customer outreach for source separation	Commercial and apartment building accounts (defined by SIC code) with one or more assists (e.g., site visit, presentation, phone exchange, email or letter offering outreach, outreach materials sent, self-assessment forms completed, waste zero champion sign-up, service level recovery improvement). Include relevant account details including address, zip code and language served for assists	Tracking progress toward shared action plan goals	N	Quarterly	Table 4
5	Contamination charges and recovery discount removals	Accounts with contamination charges and/or discount removals	Used for direct technical assistance and other monitoring needs	Y	Quarterly	N
6	Customer communication tracking	Number of communications by type and sector, including call wait time. Quarterly in-language support to all customers through call center, email, online requests forms, direct technical assistance, and in-person/virtual trainings. Capture geographic information and language(s) delivered as frequently as possible by reporting zip code.	Monitor major customer service issues. Establish customer service equity baseline of monolingual or limited-English-proficient resident and business account holders.	N	Biannually	N
7	Monthly route collection reports ("Fan 3 Reports") & Table 3	Recycling, composting and trash graphs, summary, monthly Table 3 and disposal	Used for technical assistance, overall communication, and reporting to the Office of the Controller.	Y	Monthly	Table 3
8	Noncompliant accounts	All commercial accounts and residential accounts 5 units or more without collection service for any refuse stream (and if noted SFE compliant), should tie to quarterly rate report Table 4	Used for direct technical assistance and reporting to the state regarding AB 341/1826 required recycling & composting compliance	Y	Quarterly	Table 4
9	Quarterly HHW Report	Narrative Report, Form 303 data, Battery Bucket Collection Report	Supports the annual HHW report and required by HHW Facility Operating Agreement contract	Y	Quarterly	N
10	Refuse Separation Compliance Ordinance	Large refuse generator (LRG) accounts (compactor or 40 cy/week total refuse collection volume)	Used to communicate to new LRGs and identify audit needs	Y	Quarterly	N
11	Weight scale records	Weight scale records to match the annual Table 3	Evaluating recovery rates for purposes of the Zero Waste Incentive	N	Annually	N

Abbreviation or Acronym	Title
AB	Assembly Bill
AUP	Agreed Upon Procedures
CRM	Customer Relationship Management
EAR	Electronic Annual Report
FTE	Full Time-Equivalent (for employee count)
FY	Fiscal Year
HHW	Household Hazardous Waste
iMRF	Integrated Material Recovery Facility
LRG	Large Refuse Generator
MFD	Multi Family Dwelling
OMRF	Organics Material Recovery Facility
RGG	Recology Golden Gate
RRA	Refuse Rates Administrator
RSF	Recology San Francisco
RSS	Recology Sunset Scavenger
RY or RYE	Rate Year Ending
SB	Senate Bill
SFE or ENV	San Francisco Environment Department
SS/GG	Recology Sunset Scavenger and Golden Gate
WM	Waste Management inc.