## WILLIAMS KASTNER™

September 12, 2012

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## **BY HAND**

David Danner, Executive Director and Secretary Washington Utilities and Transportation Commission Attention: Records Center P.O. Box 47250 1300 S. Evergreen Park Dr. SW Olympia, WA 98504-7250 RECORDS MANAGEMENT

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STATE OF VISA

UTIL, AND TRACE

COMMENTS

Re: Docket Nos. TG-111672 and TG-111674, In re: Murrey's Disposal Company, Inc. and American Disposal Company, Inc. – Request to Extend Current Revenue Share Plans' Reporting Periods

Dear Mr. Danner:

On behalf of the above Respondents, this is to formally request an extension of the current revenue share plans reporting periods from August 31, 2012 through November 30, 2012 in the above-captioned proceedings with revised rates and commodity credits to become effective March 1, 2013 rather than the current November 1, 2012 effective date. This request is based on a number of factors.

First is the desire by Pierce County that Murrey's and American synchronize the chronology of their plans' timing to match that of Harold LeMay Enterprises, Inc. which has a March 1 effective date for commodity credits. This would also alleviate the need to notice customers at multiple times during the year for various rate changes, as the disposal fee adjustments for Pierce County are always implemented on March 1 of a calendar year. The ability to coordinate systematic rate adjustments would mitigate any confusion on the part of customers and militates, in our view, in favor of the synchronization of revenue share plan filings which the County has previously requested.

Moreover, allowing the extension of the current plans would enable the company and the County to continue to work towards integrating all three regulated solid waste collection companies' plans in the County. While, because of differing recyclable processing arrangements, we anticipate some continuing distinctions and format of those plans, the company and the County are working towards trying to streamline and assimilate more and more plan elements so that they can be formulated and administered in a more systematic and unified basis.

Finally, the additional interval sought by the Response companies and the County through this extension, if granted, would allow continuing discussions amongst County, company and WUTC Staff personnel about any necessary changes in the format and design of prospective plans as well as the

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overall impact of the Commission's recent Interpretive and Policy Statement, TG-112672, of May 30, 2011, which occurred eight months into the current year approved plans.

We appreciate the Commission's consideration of this request and invite further questions or comments from the Staff as we look towards the present filing deadline of September 14, 2012.

Yours truly,

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## DAV:lct

cc: Steve Wamback

Dave Gomez Greg Trautman

Administrative Law Judge Greg Kopta

Client