

**King County****Solid Waste Division**

Department of Natural Resources and Parks

King Street Center

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Docket No(s): TG-220040 & TG-220099

Commenting Party: Pat D. McLaughlin, King County Solid Waste Division, Division Director

March 7, 2022

Dear Executive Director and Secretary Maxwell,

Thank you for the opportunity for King County to provide comments to the Washington Utilities and Transportation Commission (Commission) on the filing by Republic Services for a general rate increase in King County for both their Kent-Meridian and SeaTac divisions.

We acknowledge that state law requires rates to be fair, just, reasonable, and sufficient to allow the company to recover reasonable operating expenses and the opportunity to earn a reasonable return on its investment, and that the rates are based on company expenses. However, the certificated haulers have exclusive rights to collect solid waste. Customers forego the benefits in pricing that they might gain in a more competitive environment. As part of that bargain, customers should be able to expect predictable and excellent service.

We are writing to express a strong desire from the County to see an improvement in the communication between the certificated hauler with both the County and the residents and businesses it serves. We note that this applies not only to Republic Services, but to all the certificated haulers serving King County, and that this general rate case is our most recent opportunity to comment.

We want to highlight the following:

- Residents throughout King County experienced extended missed collections due to inclement weather and labor disruption in December 2021 and January 2022, with some reporting going up to 4 weeks between collections. We see a need for provisions for prolonged service disruptions for these residents.
- King County seeks to establish expectations for types and frequency of communication between the certificated hauler, its customers, and the County during inclement weather and other extended collection delays.
- King County would like to encourage the certificated haulers to proactively engage residents and the County before making substantive service changes for residents, most recently as seen in a proposed group stop conversion for a subset of rural customers in Fall City.

We also write to reiterate our commitment as an agency to increasing diversion and achieving our zero waste of resources goal. We are concerned by the increased cost of diversion services to residents relative to that of garbage (9.3% and 18.9% increases for recycling and composting vs. 2-4% increase for garbage), and we urge the commission to work with the County and the hauler to identify and maintain strong rate incentives for diversion.

In 2012, King County shared the following concerns on revised Item 30 language for missed collections.

- It includes no provisions for service disruptions due to labor disputes.
- It does not adequately address how to provide service to customers during prolonged disruptions, whether from labor disputes or recurring weather events.
- Because of the lack of performance requirements or penalties for prolonged service disruption in Item 30, regulated customers may not see their service restored as quickly as customers in cities with contracts that include such provisions.

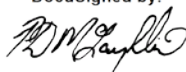
We believe Item 30 remains insufficient, and these concerns arose as clear issues for UTC customers throughout King County during the missed collections in December 2021 and January 2022 due to inclement weather, followed by the labor stoppage. King County believes that alternative service options are needed when a company is unable to safely collect on successive scheduled service dates.

We call on the commission to:

- Work with King County and the certificated haulers to ensure the company has provisions going forward for communication and expectations around customer service and resolutions for common issues.
- Define expectations with certificated haulers in the tariff for alternatives when curbside collection cannot be made for more than two consecutive weeks, such as due to inclement weather. These expectations should include communication with the affected customers and the County, as well as reporting on the areas that cannot be serviced.
- Work with King County and the certificated hauler to implement a process that involves the County in discussion before approving changes that substantively affect resident service.

Thank you for the opportunity to provide these comments. If you have any questions about these comments, please contact me at (206) 296-4485 or Pat.McLaughlin@kingcounty.gov.

Sincerely,

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Pat D. McLaughlin
King County Solid Waste Division, Division Director