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November 18, 2010

David W. Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive, SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: *Docket T-101661 – Fuel Surcharge Inquiry*

Dear Secretary Danner:

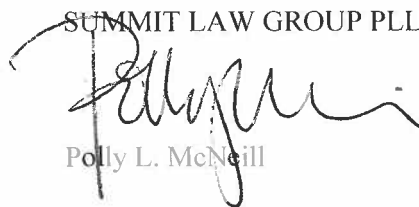
This letter is in response to the *Notice of Opportunity to file Written Comments* on the proposed inquiry regarding possible rulemaking to consider whether to adopt, by rule, methods for determining the circumstances under which the Washington Utilities and Transportation Commission would permit solid waste companies to impose a surcharge for fuel costs. Waste Management of Washington, Inc. is interested in the outcome of the inquiry, and particularly in the nature of considerations for the methods of calculating any such surcharge. Company representatives will attend the Workshop on December 7.

We do not at this time have any comments, other than to express support for a rule that allows a fuel surcharge and for a methodology that is straightforward and accommodates fluctuations in the price of diesel that are beyond the control of the regulated companies. If the basis of determining eligibility for a fuel surcharge is made in any fashion by reference to gross revenues, Waste Management believes disposal fee revenue should be backed-out because the amounts vary significantly throughout the state and the companies effectively do not profit from that income.

Thank you for your consideration to this matter.

Sincerely,

SUMMIT LAW GROUP PLLC



Polly L. McNeill

cc: David Gomez (WUTC)
Michael Weinstein

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