



King County

Solid Waste Division

Department of Natural Resources and Parks

King Street Center

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TTY Relay: 711

December 12, 2008

Dave Danner, Secretary and Executive Director
Attention: Gene Eckhardt, Assistant Director
Washington State Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

RE: Docket 082110

Dear Mr. Danner:

The purpose of this letter is to provide King County's comments regarding the effectiveness of Allied Waste of Bellevue's Recycling and Commodity Revenue Sharing Plan in 2008, and to offer support for a plan to extend revenue sharing through December 31, 2009. The plans referenced below apply to the area defined in Tariff No. 11, Rabanco LTD & Rabanco Recycling, Inc.

2008 Plan

King County is satisfied that Allied of Bellevue fulfilled the terms of the 2008 revenue sharing plan. We do not recommend that Allied of Bellevue be required to return any of the revenues that they have been allowed to retain during the 2008 plan period.

Allied cooperated fully with King County in our efforts to implement and promote food scrap recycling with yard waste services and to increase residential recycling. We believe these efforts will result in ongoing increases in recycling. Allied's achievements in 2008 include:

- Improvements in accuracy and timeliness of monthly data provided to King County.
- Distribution of educational materials developed in cooperation with King County in March, June, September, and December 2008, including brochures, targeted mailings, can hangers, and instruction decals.
- Significant improvements in recycling information on websites.
- Distribution of 2,500 96-gallon carts to customers previously using 3-bins; all customers in the area now have single stream recycling available.
- Increased staff support for customer education and improved liaison with county staff.

In addition, the material recovery facility (MRF) owned by Allied Waste that serves this area, Rabanco Recycling, made substantial investments to improve processing efficiency for single-stream materials.

Our analysis of 2007 and 2008 data from Allied of Bellevue's WUTC-regulated areas show a slight decrease in recycling per household. However, this decrease appears to be due to loss of customers with relatively high recycling rates due to city annexations.

2009 Plan

Allied of Bellevue and King County have come to an agreement on the enclosed recycling plan, for Tariff 11 service area, for the period beginning January 1, 2009 and ending December 31, 2009. An original copy of the plan signed by both parties will be transmitted to you separately. We recommend that the Washington State Utilities and Transportation Commission (WUTC) allow Allied of Bellevue to retain 30 percent of the revenues from the sale of commodities during this period. King County will evaluate Allied of Bellevue's implementation of this plan prior to its expiration. If some elements have not been fully implemented, King County may request that the WUTC consider returning some of these revenues to customers. A new plan must be agreed upon by both King County and Allied of Bellevue before we will recommend extension of revenue sharing into 2010.

In my position as Solid Waste Division Director, I have been delegated the authority to make the certification of this plan required in RCW 81.77.185. I hereby certify that the plan submitted to you by Allied of Bellevue for Rabanco LTD & Rabanco Recycling, Tariff No. 11, is consistent with the King County Comprehensive Solid Waste Management Plan. Statements in the solid waste plan that support this certification include the following:

- "The cities and County will maintain and enhance the current residential collection service levels for recyclables." (pages 4 - 31)
- "(T)he County and the cities will continue to research the benefits of using a commingled collection system, changing the frequency of collection and adding materials for collection." (pages 5 - 18)

Thank you for the opportunity to provide this letter of certification and our comments on Allied of Bellevue's recycling plan. If you have any questions, please contact Bill Reed, Program Analyst, at 206-296-4402, or bill.reed@kingcounty.gov

Sincerely,



Kevin Kiernan
Division Director

Enclosure

cc: Steven DiFabion, General Manager, Allied Waste Services of Bellevue
Don Frey, Municipal Sales Representative, Allied Waste Services
Bill Reed, Program Analyst, Recycling and Environmental Services, Solid Waste Division