



## King County

### Solid Waste Division

Department of Natural Resources and Parks

King Street Center

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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 082155

Dear Mr. Danner:

The purpose of this letter is to provide King County's comments regarding the effectiveness of the Allied Waste Services of Kent (Allied), d.b.a. SeaTac Disposal, 2008 Revenue Sharing Plan for King County, 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. 25 of the Rabanco LTD G-12 certificate.

#### 2008 Plan

King County is satisfied that Allied fulfilled the terms of the 2008 revenue sharing plan. We do not recommend that Allied 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 the following:

- Distribution of 535 96-gallon recycling carts, thereby providing single-stream recycling service to all customers in the tariff area.
- Improvements in accuracy and timeliness of monthly data provided to King County.
- Distribution of educational materials developed in cooperation with King County. These materials include updated food scrap recycling brochures, compostable kitchen food scrap bag samples provided to new organics customers, and development of 2009 calendars with food scrap recycling information.
- Significant improvements to recycling information provided on Allied's website.
- Increased staff support dedicated to customer education and liaison with county staff.

- Partnership with King County in focused multifamily recycling technical assistance and education for two multifamily complexes served by Allied, but not within the Tariff No. 25 service area.

Our analysis of 2007 and 2008 data from the Tariff No. 25 area shows a one percent increase in the recyclables collected per household (excluding yard waste).

2009 Plan

Allied and King County have come to an agreement on the enclosed recycling plan for the Tariff No. 25 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 Utilities and Transportation Commission (WUTC) allow Allied to retain 30 percent of the revenues from the sale of commodities during this period. King County will evaluate Allied's implementation of this plan prior to its expiration. If some elements have not been fully implemented, King County may request that WUTC consider returning some of these revenues to customers. A new plan must be agreed upon by both King County and Allied 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 Waste Services of Kent 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 support for Allied's recycling plan. If you have any questions, please contact Bill Reed, Program Analyst, at 206-296-4402, or [bill.reed@kingcounty.gov](mailto:bill.reed@kingcounty.gov).

Sincerely,



Kevin Kiernan  
Division Director

Enclosure

cc: Chris Guimond, General Manager, Allied Waste Services of Kent  
Joe Garza, Senior Market Analyst, Allied Waste  
Bill Reed, Program Analyst, Recycling and Environmental Services, Solid Waste Division