



WASHINGTON REFUSE & RECYCLING ASSOCIATION

October 21, 2002

Ms. Carole J. Washburn, Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7520

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UTILITY TRANSPORTATION
COMMISSION

RE: *Docket No. A-021178*

Dear Secretary Washburn:

WRRA is in receipt of the Preproposal Statement of Inquiry in the above-referenced docket. Although this is very early in the proceeding, and final comments must await the completion of the stakeholder workshops, we do have some preliminary thoughts to offer.

We believe the Commission has made a wise choice by selecting an administrative rather than legislative solution to the perceived need for further control and information regarding subsidiaries.

That being said, we continue to be of the belief that this proposal has little, if any, application to the solid waste industry. Certainly, there may well be a need for closer scrutiny of other regulated industries dealings with subsidiaries, but that need does not extend to our industry.

A solid waste hauler now is required by statute and rule to provide the commission with information regarding any and all dealings with affiliated interests. To add an additional requirement for "subsidiaries" would neither increase nor decrease the filing requirements, as it is clear that if there are any "subsidiaries" of solid waste companies information regarding same is available to the Commission via the rate review process. We want to be clear that we support any efforts to simplify and "streamline" filing requirements and procedures. We will assist that process in any manner we can. However, at this early stage, it does appear that additional filing requirements could be created which would only result in the filing of the same items twice. This would be of benefit neither to the Commission, nor WRRA members.

Thank you for the opportunity to make these preliminary comments. WRRA will attend the upcoming workshops, as will representatives of some individual member companies. I look forward to working with Commission staff to reach a consensus on this issue.

Very truly yours,

Brad R. Lovaas, Executive Director
Washington Refuse & Recycling Association

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