



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

VIA US MAIL AND FAX

September 10, 2012

Cheryl Sjolseth
Senior Market Analyst
Allied Waste Services
1600 127th Avenue NE
Bellevue, WA 98008

**RE: Rabanco Ltd. tariff filing
Docket TG-121410**

Dear Ms. Sjolseth:

On August 28, 2012, Rabanco Ltd., doing business as Allied Waste of Bellevue, Eastside Disposal, Container Hauling, Rabanco Companies, Issaquah Division, and Rabanco Connections (the Company), filed with the Washington Utilities and Transportation Commission (Commission) a general rate case filing. This filing was docketed under Docket TG-121410.

The Company's filing does not comply with the following Commission rules:

1. WAC 480-07-241(4) requires a map of the service area(s).
2. WAC 480-07-520(4) which requires a detailed pro forma income statement separated among solid waste, single family residential recycling, multifamily recycling, and yard waste, with restating actual and pro forma adjustments, **including all supporting calculations** and documentation for all adjustments. In many instances, formulas have been removed from the company's spreadsheet filing and replaced with a hard-coded number. Staff will provide the company with a listing of all hard-coded numbers in the company's filing under separate cover.
3. WAC 480-07-520(c) which requires an income statement listing all revenue and expense accounts by month.
4. WAC 480-07-520(e) which requires a detailed list of all nonregulated operations, including the rates charged for the services rendered.



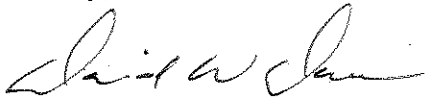
5. WAC 480-07-520(j), which requires information about every transaction with an affiliated interest or subsidiary that directly or indirectly affects the proposed rates. This must include: A full description of the relationship, terms and amount of the transaction, the length of time the relationship has been ongoing, and an income statement and balance sheet for every affiliated entity.
6. WAC 480-07-520(5), which requires the most recent consolidated annual report to shareholders, if any.
7. In addition, formulas have been removed from the cost of service study included in the filing and multiple incorrect cell references to linked spreadsheets are seen, returning error messages rather than the results of calculations.

State law requires the Commission to approve or suspend rate case filings within 30 days. Because this filing is missing essential information, Commission staff is unable to undertake a meaningful review.

Under WAC 480-07-141, the Commission may reject a filing if it is insufficient or defective. Therefore, the Company's request filed on August 28, 2012, is rejected in its entirety. However, please be advised that the company may re-file at any time reflecting the corrections, new effective dates, and any new issues.

If you have any questions regarding this letter, please contact Amy White at awhite@utc.wa.gov or (360) 664-1247.

Sincerely,



DAVID W. DANNER
Executive Director and Secretary