



COUNTYWIDE SOLID WASTE PROGRAMS

of Douglas County

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April 13th, 2007

Washington Utilities and Transportation Commission
 c/o: John Cupp, Consumer Affairs
 P.O. Box 47250
 Olympia, Washington 98504-7250

Dear Mr. Cupp,

I was asked by the Douglas County Board of Commissioners to review *Waste Management of Greater Wenatchee, a division of Waste Management of Washington, Inc. (G-237); Tariff No. 12*. The Commissioners received a copy of the proposed tariff increase from Waste Management on March 22nd, 2007 and forwarded a copy to my office on April 4th, 2007. Upon review of the proposed tariff increase I would make the following comments on that portion specific to unincorporated Douglas County (Tariff #11) on behalf of Douglas County.

Item 100 – Residential Service – Monthly Rates

Original Page No. 22

As specified within the *Douglas County Minimum Service Level Ordinance (C.E. 04-07)* adopted on January 21st, 2004 “each county residential solid waste generator who resides within the Unincorporated Area of Douglas County shall be afforded an opportunity to voluntarily subscribe to yard debris collection services provided by a Certified Solid Waste Hauler.” Therefore, the illustration that Yard Waste Service is not applicable (n/a) within the proposed monthly rate is inconsistent with the adopted ordinance.

Item 100 – Residential Service – Monthly Rates

Original Page No. 24

As specified within the *Douglas County Solid Waste Collection and Disposal Fee Ordinance (C.E. 94-014-01)* adopted on January 19th, 1994 “therefore, be it ordained that the solid waste collection fee upon certified solid waste collection companies operating within the unincorporated areas of Douglas County will be assessed annually as follows:

$$\text{Fee} = \frac{A + B}{C} \times \text{A\&I Fee}$$

Where:

Fee = the solid waste collection service fee imposed upon each certified solid waste collection company within Douglas County;

A = the weight of the solid waste collected during the twelve (12) month period of January 1st through December 31st of each year by each certified solid waste collection company from commercial sources within their franchised hauling area within the unincorporated areas of Douglas County;

B = the weight of the solid waste collected during the twelve (12) month period of January 1st through December 31st of each year by each certified solid waste collection company from residential sources within their franchised hauling area within the unincorporated areas of Douglas County;

C = the total weight of solid waste collected during the twelve (12) month period of January 1st through December 31st of each year by all certified solid waste collection companies within the unincorporated areas of Douglas County;

A&I Fee = the annual administration and implementation fee owed by Douglas County as its ‘Fair Share’ portion of the regional solid waste program. Amount is determined through the annual Douglas County budgetary process.

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Therefore, Note 5 is inaccurate as the solid waste collection fee will continue to be assessed as long as Douglas County is responsible for its 'Fair Share' portion of the regional solid waste program budget. So unless Waste Management wishing to absorb this fee and not pass it through to its customers as part of its rate structure, this fee will not expire on March 31st, 2008. Additionally, for clarification the annual solid waste collection fee is computed annually based upon the formula illustrated above and is not a set amount as shown by Waste Management in its proposal. The annual solid waste collection fee may vary from year to year, based upon the approved annual Countywide Solid Waste Program Budget as approved by Douglas County. For example the following solid waste collection fees were assessed against Waste Management:

2002	\$121,137	2003	\$114,090
2004	\$151,451	2005	\$153,364
2006	\$134,193	2007	\$106,257

Item 230 – Disposal Fees

Original Page No. 31

As specified within the *Douglas County Solid Waste Disposal Host Agreement (C.E.04-75)* adopted on July 28th, 2004 by and between Waste Management of Washington, Inc. and Douglas County “all acceptable waste received at the landfill shall be measured by weight. All vehicles and containers shall be weighted in and out of the landfill.” Therefore the disposal fees for the Greater Wenatchee Landfill should be stated in tons not per yard as illustrated. This will standardize the reporting of rates and volumes to what is accepted by the Washington State Department of Ecology and by most solid waste disposal facilities throughout the state. It will also provide the public with a standardized and verifiable disposal rate based upon actual weights rather than the current arbitrary (guesstimate) of how many cubic yards is being disposed of.

Item 240 – Container Service – Dumped in Company’s Vehicle

Original Page No. 33

Note 4 is inaccurate as the solid waste collection fee will continue to be assessed as long as Douglas County is responsible for its 'Fair Share' portion of the regional solid waste program budget.

Item 245 – Container Service – Dumped in Company’s Vehicle

Original Page No. 34

Note 2 is inaccurate as the solid waste collection fee will continue to be assessed as long as Douglas County is responsible for its 'Fair Share' portion of the regional solid waste program budget.

Item 255 – Container Service – Dumped in Company’s Vehicle

Original Page No. 36

Note 4 is inaccurate as the solid waste collection fee will continue to be assessed as long as Douglas County is responsible for its 'Fair Share' portion of the regional solid waste program budget.

Item 260 – Drop Box Service – To Disposal Site and Return

Original Page No. 38

Note 4 is inaccurate as the solid waste collection fee will continue to be assessed as long as Douglas County is responsible for its 'Fair Share' portion of the regional solid waste program budget.

Item 275 – Drop Box Service – To Disposal Site and Return

Original Page No. 40

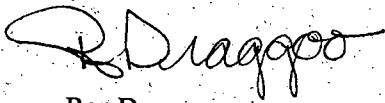
Note 4 is inaccurate as the solid waste collection fee will continue to be assessed as long as Douglas County is responsible for its 'Fair Share' portion of the regional solid waste program budget.

Additionally, as specified within the *Douglas County Minimum Service Level Ordinance* Section 3.08 WASTE REDUCTION AND RECYCLING (A) “each certified solid waste hauler shall provide to each new applicant for service, and at least once a year to all current customers, within its WUTC franchised service area, a list, brochure, newsletter or similar document that describes: the rights and responsibilities of the solid waste customers; the steps which the certified solid waste hauler or the customer must take to discontinue service; and applicable deposit policies and the procedures by which customers can pursue billing or service complaints and disputes”, (B) “each certified solid waste hauler shall provide to each new applicant for service, and at least once a year to all current customers, within its WUTC franchised service area, a list, brochure, newsletter or similar document that describes: all service options and service levels available to its customers; all waste reduction and recycling programs and service options available to its residential customers; and all waste reduction and recycling programs and service options available to its non-residential customers.”

Section 3.09 INSPECTIONS AND REPORTING (4) Annual Reporting, "each certified solid waste hauler within Douglas County shall provide an annual report to the Douglas County Board of Commissioners by April 1st of each year reporting totals, in pounds (tons), for the following solid waste collected during the preceding calendar year: residential waste, multifamily waste, commercial waste, institutional waste, industrial waste, and designated recyclables by commodity. Additionally, each annual report shall include the following information: name of the certified solid waste hauler, address of the certified solid waste hauler, business phone of the certified solid waste hauler, WUTC certificate or public convenience and necessity number, number of residential customers served (by account), number of multifamily customers served (by account), number of commercial customers served (by account), number of institutional customers served (by account), number of industrial customers served (by account), and number of complaints received." Knowing that there are costs associated with these responsibilities and feeling fairly comfortable that Waste Management of Greater Wenatchee will pass through the additional costs to its customer I looked for some reference to these required services within the proposed tariff increase, however I was unable to find any specific reference to these required services.

This concludes my comments on the proposed new Tariff No. 12 submitted by Waste Management of Greater Wenatchee. If you have any question or wish clarification on any item discussed, please contact me at (509) 886-0899.

Professionally,



Ron Draggoo
Solid Waste Program Administrator

cc: Layne Demas, Washington Utilities and Transportation Commission
Douglas County Board of County Commissioners
Ted Woodard, Waste Management of Greater Wenatchee District Manager