



**King County**

**Solid Waste Division**

Department of Natural Resources and Parks

King Street Center

201 South Jackson Street, Suite 5701

Seattle, WA 98104-3855

**206-477-4466**

711 TTY Relay

[www.kingcounty.gov/solidwaste](http://www.kingcounty.gov/solidwaste)

Received  
Records Management  
Aug 28, 2024

August 19, 2024

Mike Young

Washington Utilities and Transportation Commission

**UTC Headquarters**

621 Woodland Square Loop SE

Lacey, WA 98503

Dear Mr. Young:

The letter is to express King County Solid Waste Division's (SWD) concerns regarding the proposed rate increase detailed in UTC filing TG-240529, submitted by Waste Management of Washington, Inc., regarding Tariff North Sound, Waste Management – Marysville (G-237 | Tariff 19), seeking to replace Tariff 19 with Tariff 20, which would result in a rate increase generating approximately \$5,952,000 (7.6 percent) in additional annual revenue.

As required by RCW 81.77.120, the county legislative authority is responsible for providing periodic written feedback to the commission on the adequacy of services provided by regulated franchisees in unincorporated areas and any written comments or letters shall become part of the record of any rate, compliance, or any other hearing held by the commission on the issuance, revocation, or reissuance of a certificate provided for in RCW 81.77.040.

This letter outlines King County's concerns and requests further clarification from Waste Management (WM) before a decision is made by the Washington Utilities and Transportation Commission (WUTC).

**Monthly Rate Analysis:**

The purpose of WAC 480-07-520(4) is to ensure the solid waste collection companies to provide all necessary information to the Commission to assess whether the proposed and/or existing rates are fair and reasonable.

Due to some of the analysis being considered proprietary commercial information for the company, WM has requested to be exempted from providing this information in conjunction with the rate increase proposal. As a result, the rate analysis below is focused solely on residential rates.

King County reviewed the single-family residential rates of nearby cities serviced by WM in comparison to the current rate (Tariff 19) and the proposed rate (Tariff 20). The cities included in this analysis are Duvall, Kirkland, and Redmond.

The data below looks at the current monthly rates for 32/35-gallon garbage, 96-gallon recycling and 96-gallon yard waste.

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	32/35 gal Garbage	96 gal Recycling	96 gal Yard waste	<b>Subtotal (All services)</b>
Duvall	\$35.16	Included	\$18.31	\$53.47
Redmond	\$21.49	Included	Included	\$21.49
Kirkland	\$47.84	Included	Included	\$47.84
Tariff 19 (Current)	\$20.11	\$9.23	\$13.00	\$42.34
Tariff 20 (Proposed)	\$22.03	\$10.10	\$14.30	\$46.43

To give a more holistic representation of cost burden to customers and for the reasons outlined below, King County combined the cost of all services to provide the rate comparison between the neighboring jurisdictions:

- The surrounding jurisdictions have recycling and/or yard waste embedded into the monthly garbage rate and services, whereas the rates are separated out per services in unincorporated areas. However, it is mandatory for the residents to have recycling in conjunction with the garbage service within the unincorporated areas.
- While yard waste is currently optional and residents can choose to opt out in unincorporated areas, it will become mandatory for many of our residents by 2030, following the recent passage of state law, HB 2301.

The proposed rate might appear reasonable when comparing only the rates are compared with the surrounding jurisdictions. However, it is also important to consider the services our residents receive.

**Service Frequency Analysis:**

	<b>Garbage</b>	<b>Recycling</b>	<b>Yard waste</b>
Duvall, Kirkland, Redmond	Weekly	Weekly	Weekly
Unincorporated	Weekly	Every Other Week	Every Other Week

All the surrounding jurisdictions receive weekly services for all garbage, recycling, and organics, except for Duvall, shifting to every other week service for yard waste from December through February. In contrast, unincorporated areas receive every other week service for recycling and yard waste service year-round, while maintaining a roughly similar monthly rate as the surrounding jurisdictions. This means that unincorporated residents receive 30% less service (52 less pickups per year) compared to neighboring city residents.

**Missed Pickup:**

In Duvall, Kirkland, and Redmond, WM is required to service missed pickups within 24 hours of notification. Non-compliance with this policy will result in a performance fee. In comparison, the Tariff does not specifically address missed pickups in unincorporated areas (not relating to inclement weather and/or labor disruptions). Residents of unincorporated King County have reported that missed pickups are not serviced until the next scheduled service day, which can be up to two weeks later for recycling and/or yard waste.

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If residents of unincorporated areas want a missed pickup to be serviced within 24 hours, WM treats as a “special pickup” and requires a \$151 payment for the service. This same service is mandatory for the certified hauler to provide within the surrounding jurisdictions at no additional cost.

**Additional Services Analysis:**

Duvall, Kirkland, and Redmond offer additional services, such as but not limited to:

- Free 6 ft tall Christmas tree pickup first 2 weeks of January
- One free bulky item pick up per year
- Up to 5 extra units of yard waste per week in the month of November
- Extra recycle with the regular service at no additional cost
- Free Kitchen Compost Container
- Support 3 city sponsored events at no charge

The additional services above are not offered to unincorporated area residents. While King County understands and respects the difference between jurisdictions contracts and the tariffs, but we cannot support the similarity in rates without providing a comparable level of services to the residents of unincorporated areas.

King County respectfully asks the Washington Utilities and Transportation Commission to delay the decision on TG-240529 until King County and WM have had the opportunity to discuss the details further. I am confident that King County and WM will be able to reach a solution, as we are both committed to the same goal of representing our residents/customers equitably.

Thank you for the opportunity to provide comments and concerns. We strongly believe WUTC plays a vital role in promoting and ensuring fairness for the residents of unincorporated areas and we appreciate and value the partnership. Please reach out to Christine Kim, who serves as the primary contact for the certified haulers and WUTC.

***Christine Kim***

King County Solid Waste Division (SWD)  
Unincorporated Areas & Strategic Program Manager  
[Chkim@kingcounty.gov](mailto:Chkim@kingcounty.gov)  
206-677-3394

Again, I appreciate your commitment to serving our shared residents.

Sincerely,

DocuSigned by:  


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Pat D. McLaughlin  
Division Director

cc: John Taylor, Department of Natural Resources and Parks Director, King County  
Andy Smith, Recycling and Environmental Services Section Manager, SWD  
Chris Stubbs, Deputy Division Director, SWD  
Christine Kim, Unincorporated Areas & Strategic Program Manager, SWD  
Evan Burmester, Sr. Financial Analyst, Waste Management