

FORMAL COMPLAINT, PETITION, BAP, AND  
REJECTION OF FILINGS  
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TRANSPORTATION DOCKETS

Date: 10/29/10

Docket No: TG-101784

Document: **Petition on behalf of Stericycle of Washington, Inc., for exemption from WAC  
480-70-396(6), Billing.**

Chairman Goltz  
Commissioner Oshie  
Commissioner Jones  
ALD  
Public Affairs (Check w/Marilyn Meehan  
before distributing!!)  
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Anne Solwick  
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Gene Eckhardt  
Penny Ingram  
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Steve King  
Dave Pratt  
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**No Rail**

Cathy Kern  
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**Rail only**

Bob Boston (GCPF and Fencing and Close Clearance Exemptions Only)  
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G A R V E Y S C H U B E R T B A R E R

Please reply to STEPHEN B. JOHNSON  
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 DIRECT 206-816-1309

October 28, 2010

Secretary  
 Washington Utilities and Transportation Commission  
 P.O. Box 47250  
 1300 S. Evergreen Park Dr. SW  
 Olympia, WA 98504-7250

Re: Petition for Approval of Consolidated Billing  
 Stericycle of Washington, Inc. (G-244)

2010 OCT 29 AM 10:29

Dear Secretary:

We are attorneys for Stericycle of Washington, Inc. ("Stericycle") and are writing to you in that capacity.

Please accept this letter as Stericycle's petition for Commission approval of Stericycle's proposal to provide consolidated billing to its customers for regulated and non-regulated services. This petition is provided to you pursuant to WAC 480-70-396(6).

Enclosed as Exhibit A is an example of Stericycle's proposed consolidated billing format. As required by WAC 480-70-396(6), the proposed format discloses charges for non-regulated activity as a separate line item and includes the Stericycle 800-number where the customer may contact the company on issues related to both regulated and non-regulated services.

Charges for regulated and non-regulated services are shown separately on p. 2 of Exhibit A – regulated charges appear under the reference for "Site 001" and non-regulated charges under the reference for "Site 002." The charges for non-regulated services are clearly labeled as such. The non-regulated services are described and include OSHA compliance training, access to on-line educational resources, etc.

Consolidated billing is proposed to reduce paperwork and to minimize the potential for customer confusion. Use of consolidated billing is not expected to have any significant impact on Stericycle's cost of service.

Stericycle understands and acknowledges the following:



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Washington Utilities and  
Transportation Commission  
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1. If a customer makes partial payment, Stericycle must apply the payment to the regulated solid waste charges first (WAC 480-70-396(6)(b)).
2. Stericycle may terminate regulated service only for non-payment of the regulated portion of its billings and must so inform the customer in a notice at the time of termination (WAC 480-70-376).
3. Stericycle must reinstate regulated service on payment of the outstanding balance of its billings for regulated service (WAC 480-70-381).
4. Stericycle may not discontinue regulated solid waste services if the customer does not pay for non-regulated services, but has paid in full for regulated solid waste services (WAC 480-70-396(6)).

Please let me know if further information concerning this matter is required or would be useful to the Commission.

Thank you for your assistance.

Very truly yours,

GARVEY SCHUBERT BARER

By   
Stephen B. Johnson

Encl.

Cc: Mike Philpott, Stericycle  
Penny Ingram, WUTC Staff

SEA\_DOCS:973739.1

# EXHIBIT A



**Stericycle**  
Protecting People. Reducing Risk.

## INVOICE

INVOICE DATE	04/01/2009
INVOICE NUMBER	1000742029
CUSTOMER NUMBER	8173554

SPINAL DIAGNOSTICS  
ACCOUNTS PAYABLE  
528 E SPOKANE FALLS BLVD  
SUITE 14  
SPOKANE, WA 99202



For billing, scheduling or customer service:  
**(866) 783-7422**  
Hours: (Mon - Fri) 7:00 AM - 7:00 PM CST  
CustomerCare@Stericycle.com

PAYMENT IS NEEDED TO AVOID COLLECTION AGENCY REFERRAL

### ACCOUNT SUMMARY

DESCRIPTION	DATE	AMOUNT	TOTAL
PREVIOUS BALANCE			\$100.00
CURRENT ADJUSTMENTS			
Thank You-Payment #0000035520	3/27/2009	(\$20.00)	\$5.00
Misc. Credit - Ref #1000686528	3/16/2009	(\$5.00)	
Misc. Debit - Ref #1000686528	3/23/2009	\$30.00	

**CURRENT INVOICE CHARGES** Includes Steri-Safe - Preferred (See Next Page For Details) **\$150.90**

**TOTAL ACCOUNT BALANCE DUE 05/01/2009** **\$255.90**

**CERTIFICATION:** The material listed on the manifest(s) (infectious medical waste) has been treated in accordance with the requirements of federal, state, and local regulations governing the treatment of such waste. A copy of this certificate, applicable manifests, and the appropriate logs will remain on file with the company. For customers in AZ, MO, NM, NY, PA, PR, and WI this invoice also serves as a certification of destruction.

**Account History** Please disregard if payment has been sent.

Current	1-30 days Past Due	31-60 days Past Due	61-90 days Past Due	90+ days Past Due	Total Account Balance
\$140.75	\$0.00	\$105.00	\$0.00	\$0.00	\$245.75

PLEASE DETACH AND RETURN BOTTOM PORTION WITH YOUR PAYMENT IN THE ENCLOSED ENVELOPE.

TO ENSURE TIMELY POSTING OF YOUR PAYMENT PLEASE ALLOW 5 DAYS FOR MAILING.



**Stericycle**  
Protecting People. Reducing Risk.  
Stericycle, Inc.  
4010 Commercial Ave.  
Northbrook, IL 60062

INVOICE NUMBER 1000742029	INVOICE DATE 04/01/2009	CUSTOMER NUMBER 8173554
TOTAL ACCOUNT BALANCE DUE 05/01/2009		\$245.75
TOTAL AMOUNT ENCLOSED		\$
	SECURITY CODE	EXP DATE
CARD NUMBER	/	
SIGNATURE	PRINTED NAME	

If account or contact information has changed please check box and fill out back portion of coupon

0005007534 4000668132 0000000000000000 3 010007

ADDRESSEE:  
4000668132 0000  
SPINAL DIAGNOSTICS  
ACCOUNTS PAYABLE  
528 E SPOKANE FALLS BLVD  
SUITE 14  
SPOKANE, WA 99202

REMIT TO:  
0005007534 4000668132 0000  
STERICYCLE, INC.  
P.O. BOX 9001590  
LOUISVILLE, KY 40290-1590

DATE	MANIFEST/ ORDER NUMBER	QUANTITY/ CONTAINERS	DESCRIPTION	WEIGHT	PRICE	TOTAL
3/2/2009	MDRM0036CZ	1.00	48 Gal Steri-Tub Disposal	51.60 LB	\$75.670 EA	\$75.67

Site 001: SUB TOTAL \$75.67  
 Site 001: TAX TOTAL \$10.00  
 Site 001: TOTAL \$85.67

Site 002: Spinal Diagnostics, non-regulated waste management, Spokane, WA 99202  
 4/2/2009

Steri-Safe OSHA Compliance \$65.23  
 Preferred Level - Annual Billing  
 Includes:

- Medical Waste Management
- Annual On-Site BBP Training
- Annual On-Site Mock-OSHA Eval
- OSHA Compliance Guarantee
- Online BBP Training
- OSHA Safety Plan Builder
- Online Safety Meeting Library
- Online MSDS System
- Haz. Com. Poster and Labels
- Labor Law and Red Bag Posters
- 10% Product Discount

Site 002: SUB TOTAL \$65.23  
 Site 002: TAX TOTAL \$0.00  
 Site 002 TOTAL \$65.23

**Total Current Invoice Charges \$150.90**

IF CURRENT ACCOUNT INFORMATION HAS CHANGED, PLEASE ENTER THE CORRECT INFORMATION BELOW.

Billing Information Change	Service Information Change
ACCOUNT NAME	
CONTACT	Admin <input type="checkbox"/> Safety/OSHA <input type="checkbox"/> Other <input type="checkbox"/>
EMAIL	
ADDRESS	
CITY, STATE, ZIP CODE	
PHONE NUMBER	
FAX NUMBER	

For Reference Purposes Only: Detailed Format