

December 17, 2010

David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

RE: Sanitary Service Co, Inc., G-14 – General rate increase request

Dear Mr. Danner:

With this transmittal letter, in accordance with WAC 480-07-520 we are submitting a general rate increase request for Sanitary Service Company, Inc., D/B/A Sanitary Service Company and Recycling Services, Inc., operating under authority of Certificate of Public Convenience and Necessity No. G-14. For this filing we are requesting an effective date of February 1, 2011.

The history leading up to this filing is relevant. On the August 27, 2009 Agenda, Item number B1, docket # TG-091148 for a general rate increase we received a memo (enclosed) and we were asked to do the following:

1. Work with staff to improve supporting documentation of work and time of consulting and lobbying services for Patrick Dunn & Associates
 - a. A new timesheet reporting mechanism was developed. Patrick Dunn & Associates e-mail a timesheet to Mr. Layne Demas each month, specifying the regulated activities which he is working on for company as they pertain to Certificate No. G-14.
 - b. A copy of Mr. Dunn's e-mail and timesheet that was sent for this purpose for the last month of the test period, September 2010, in this general rate case filing are enclosed.
 - c. The entire test period for this general rate case filing is supported by this improved methodology.
2. The company was asked to maintain more accurate data on the time assets that are used to provide drop box collection services and work with staff to identify appropriate data to collect on an ongoing basis.
 - a. The company designed a new process for collecting time to meet this standard, met with staff, and provided additional documentation to Mr. Eugene Eckhardt per his request.
 - i. The company received an e-mail from Mr. Layne Demas on April 1, 2010, (enclosed) after his review of the proposed methodology, denoting that it was a vast improvement and should meet staff expectations on this front.
 - b. The data collection for these services for the entire test period for this general rate case filing was allocated using this improved methodology.

3. File a rate case with an anticipated effective date of March 1, 2011, after collecting and allocating data for a 12 month period using the aforementioned improved methodologies.
 - a. This general rate case filing, with an effective date of February 1, 2011 was created to meet this request.

Additionally, since our last general rate case filing under docket TG-101354 effective September 22, 2010, all of the rights to Certificate of Public Convenience and Necessity No. G-145 previously held by Blaine Bay Refuse, Inc., a wholly owned subsidiary of Sanitary Service Co., Inc., were transferred to certificate G-14. The company adopted Blaine Bay Refuse' Tariff # 3 to effectuate this transfer. This general rate case combines SSC's tariff with BBR's tariff into a single tariff. The last general rate case filing for BBR's Tariff # 3 was in 2002.

Garbage Collection Rates: As part of this rate case, the company has determined that its regulated garbage rates are more than sufficient after restating and proforma adjustments using the revised methodologies discussed above. Therefore, if the rates are approved by the commission, the company would be decreasing garbage revenue by less than one percent (-0.61%). This filing requests approval to combine the company's regulated garbage rates across two tariffs, (SSC Tariff # 6 & BBR Tariff #3) which results in an overall decrease in revenue to the combined company. This represents an increase to rates in BBR's Tariff # 3 and a decrease in rates to SSC's Tariff #7 to equalize rates across the entire company. Net revenue impact to the company is a loss in earnings of approximately (\$80,000) as a result of this combination of tariffs and overall decrease in revenue.

Single-family recycling: As part of this rate case, the company has determined that its regulated single – family residential recycling rates need to increase by approximately 14% overall to generate an additional estimated \$126,000 of revenue per year, using the revised methodologies discussed above. If the company's request is approved, approximately 20,000 customers will be impacted by this overall single family residential recycling rate increase, 17,500 customers under current SSC tariff # 6, and 2,500 under current BBR tariff #3.

The reason for this increase is primarily attributable to BBR's rates being significantly below what is needed to achieve any profit. These rates have been in place since 2002 and haven't evolved as they should have with economic changes in the last 9 years. They are currently 40 % below rates in SSC's Tariff # 6 for the same level of service. The company acquired Blaine Bay Refuse around the time of its last general rate case. The company was in the process of absorbing this new customer base into their operations and were not at a point where they could provide sufficient data to forecast a revenue need as part of that filing. SSC has held BBR for approximately 2 years now, increasing efficiencies in that area as much as possible.

Multifamily recycling: As part of this rate case, the company has determined that its regulated multifamily recycling rates are more than sufficient after restating and proforma adjustments using the revised methodologies discussed above. If approved by the commission, the filing would decrease multifamily recycling revenue to the total company by -14.0%. Combining its regulated tariff rates results in an overall decrease in revenue to the company but represents an increase to a few rates in

BBR's Tariff # 3 and a decrease in rates to SSC's Tariff #6 to equalize rates across the entire company. Net revenue impact to the company is a loss in earnings of approximately (\$32,000) as a result of this combination of tariffs and overall decrease to the company.

Yard Waste: As part of this rate case, the company has determined that its regulated yard waste rates are more than sufficient after restating and proforma adjustments using the revised methodologies discussed above. The company's filing, if approved would decrease revenue to the total company by less than one percent(-0.74%). Combining its regulated rates across the two tariffs results in an overall decrease in revenue to the company but represents an increase to rates in BBR's Tariff # 3 and a decrease in rates to SSC's Tariff #6 to equalize rates across the entire company. Net revenue impact to the company is a loss in earnings of approximately (\$1,300) as a result of this combination of tariffs and overall decrease to the company.

The total revenue impact requested in this general rate request is an increase of approximately \$12,000. This is an increase of .08% to the company.

An electronic filing that includes this transmittal letter and tariff pages, customer notices and supporting staff work papers is being filed today, pursuant to WAC 480-07-140-(1)(a). Hard copies are being placed in the mail today, with a summary of how the filing complies with WAC 480-07-520. Customer notices will be mailed on December 30, thirty days prior to the requested effective date. A copy of this letter is being placed in the mail today to the Whatcom County Council.

Sincerely,

Edward Nikula
Vice President

Agenda Date: August 27, 2009
Item Number: B1

Docket: TG-091148
Sanitary Service Co., Inc., G-14

Staff: Layne Demas, Transportation Program Staff
Nancy Paulson, Consumer Protection Staff

Recommendation

Take no action, allowing the proposed revised rates filed by Sanitary Service Co., Inc., to become effective September 1, 2009, by operation of law.

Discussion

On July 17, 2009, Sanitary Service Co., Inc., (Sanitary Service or company), filed with the Utilities and Transportation Commission (commission) tariff revisions that would generate approximately \$472,716 (4.2 percent) in additional revenue per year. The tariff revisions propose to increase rates for solid waste collection. The proposed rate revisions are prompted by increases in driver wages, fringe benefits, and payroll taxes, disposal fees, billing and collecting costs, and fuel. Sanitary Service serves approximately 21,700 residential and commercial regulated customers in Southwestern Whatcom County. Sanitary Service's last general rate increase became effective July 1, 2008.

Staff's analysis shows Sanitary's proposed rates are excessive. Staff and the company have negotiated revised rates that would generate approximately \$162,000 (1.5 percent) in additional annual revenue. On August 21, 2009, Sanitary filed substitute pages with the commission reflecting the revised rates.

Staff's review identified two areas in which the company must improve its recordkeeping.

1. Consultant. The company retains a consultant who provides business consulting and lobbying services. Compared to the last general rate case, the company provided better justification for these expenses and, after lengthy conversations with company representatives, staff has a much better understanding of the consultant's role and the services provided. The company removed all lobbying expenses and allocated the remaining business consulting expenses between regulated and nonregulated services. Staff made additional adjustments to the amount the company allocated to regulated services and believes that the company has reasonably demonstrated those expenses are appropriate and that the company's overall management and overhead expenses are reasonable. The company understands staff's concerns regarding the level of detail provided for this activity and has committed to work with staff to improve supporting documentation of work and time.
2. Allocation of Regulated Drop Box and Nonregulated Commercial Recycling. The company uses the same trucks and containers for regulated drop box service and nonregulated commercial recycling service. The company separated the two services

using a revenue allocation factor. That allocation treats the two services as having the same average cost.

The company provided a time study that indicates the average time required to serve nonregulated commercial recycling accounts is less than the average time required to serve regulated drop box accounts; however, the company did not use the study results to allocate costs between the regulated and unregulated services. Using the results of that study would increase the cost for regulated drop box service and decrease the cost of nonregulated commercial recycling service. That is, nonregulated commercial recycling customers appear to be subsidizing regulated drop box customers. Staff does not believe the study provides sufficient information to change the allocation factor, which would result in an increase to regulated drop box customers. The company agrees with staff that the company needs to maintain more accurate data on the time assets are used to provide different services and has committed to work with staff to identify appropriate data to collect on an ongoing basis.

3. The company commits to filing a rate case to implement the results of the data collected by improved methods for both the consulting services and the use of assets. Considering the time to develop and implement data collection processes, collect 12 months of data, analyze data, and prepare and file a rate case, staff believes that it is reasonable for the company to file the rate case with an anticipated effective date of March 1, 2011.

Customer Comments

On June 23, 2009, the company notified its customers of the proposed rate increase by mail. A total of six customer comments have been received to date. All comments oppose the proposed rate increase. Please note that customers often address several issues of concern within one comment. Therefore, subtotals may not equal the total number of comments submitted.

Consumer Protection staff advised customers that they have access to all company's documents pertinent to this rate case at www.utc.wa.gov and that they may contact Nancy Paulson at 888-333-9882 with questions or concerns.

Business Practice Comments

- One customer is angry about the 'unlatch' charge to unlock the dumpster at her apartment complex. One customer commented that Sanitary Service Company and Blaine Bay Refuse both run trucks in the same territory. Services should be integrated to cut costs.

Staff Response

- The 'unlatch' charge is allowed per the company's tariff. Sanitary Service Company and Blaine Bay Refuse are allowed overlapping service territories on the Blaine Bay peninsula at this time.

General Comments

- Three customers are opposed to the proposed increase because they are on fixed incomes. Two customers are opposed to a rate increase because of the poor economy. One customer is an apartment owner and the rent is her only source of income. She cannot raise her rents to cover a rate increase so her own income will decrease. One customer commented the proposed rates should be decreased 50 percent. Three customers mentioned the price of fuel has decreased so fuel costs should not be factored into an increase.

Staff Response

- Consumer Protection staff advised customers that state law requires rates to be fair and reasonable for customers, and sufficient to allow the company a chance to recover operating expenses and earn a return on investment. Even though fuel costs have come down from last year's level, the commission uses a twelve month average to determine the fuel costs allowed in rates.

Rate Comparison

<u>Residential - Monthly Rates</u>	<u>Present</u>	<u>Proposed</u>	<u>Revised</u>
One Mini Can Per Week	\$ 9.67	\$10.15	\$ 9.84
One 32 Gallon Can Per Week	11.83	12.41	12.03
One 64 Gallon Cart	15.92	16.71	16.20

Commercial - Per Pickup

One Yard Container 1 st Pickup	22.16	23.25	22.52
Addl. Pickup	12.95	13.59	13.17
Two Yard Container 1 st Pickup	36.18	37.98	36.79
Addl. Pickup	23.75	24.92	24.15

Average Customer Charge Comparison – One Can Customer

<u>Monthly Service</u>	<u>Present</u>	<u>Proposed</u>	<u>Revised</u>
Garbage Component	\$11.83	\$ 12.41	\$ 12.03
Mandatory Recycling <i>net of commodity credit</i>	<u>\$4.14</u>	<u>\$4.14</u>	<u>\$4.14</u>
Total Garbage and Recycling	\$15.97	\$16.55	\$16.17
Voluntary Yardwaste	<u>\$10.70</u>	<u>\$10.70</u>	<u>\$10.70</u>
Total: Garbage, Recycling and Yardwaste	\$26.67	\$27.25	\$26.87
Percentage Increase		2.2 %	.7 %

Commission staff has completed its review of the company's supporting financial documents, books and records. Staff's review shows that the expenses are reasonable and required as part of

the company's operations. The company's financial information supports the proposed revenue requirement and the proposed rates and charges are fair, just, reasonable, and sufficient.

Conclusion

Take no action, allowing the proposed revised rates filed by Sanitary Service Co., Inc., to become effective September 1, 2009, by operation of law.

Amber Jones

From: Patdunnoly@aol.com
Sent: Friday, October 01, 2010 1:26 PM
To: LDemas@utc.wa.gov
Cc: Amber Jones
Subject: and the attachment
Attachments: SSC-RegulatedAreaTimesheet-Sept'10.doc

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Sanitary Service Company Timesheet – Regulated Area

September 2010

Mo Year	Time	Activities
1.	2.25	Review issues related to illegal hauling in Whatcom county, review report to the WUTC, follow up on Paul's report, review Brad's report to the WUTC staff to review, review the facts of the situation and company involved, work on community matter for Paul and SSC, follow up on meeting and related issues, review data requests for local governments and issues with SSC data system, follow up with Amber on employee matter, review draft letter on illegal hauling, look at comments from customer survey on service for SSC and suggestions for changes to survey and service, review issues related to disposal issues in Whatcom county, review local government matter involving SSC, follow up on materials on SSC from Paul, follow up on Board matter, review copyright matter and note from Polly, follow up on local government matter, review disposal matter.
2.	2.50	Review matters about the lease, signing by both parties, work on design for the internal space, rate related work on the lease and timing, follow up on notes from Rodd, Ed and Amber about work load and rate issues, meet with Jeff in Kirkland on SSC matters, follow up on community issues with Paul, follow up on operational issues, follow up on Paul request regarding owner matters, review space issues, review moving issues, timing and organization, review issues for Amber CLE on rate making from other haulers, discuss with Jeff rate and corporate matters, review logo matter, follow up on space issues, review employee matters, follow up on filing matters for reports, look at staffing for new space, follow up on advertising matter.
3.	3.25	Meet with other haulers on issues of interest to SSC, follow up on solid waste issues, review matters related to DOE new proposed solid waste rules that impact SSC, review issues from other haulers on commission matters and review that impact SSC rate filing and rate review, review operational matters.
4.	1.25	Follow up on disposal matter and issues in Whatcom county, review draft letter for Paul and make comments, follow up on local community matter for Paul, review disposal and odor problems, review organic waste matter from Rodd from last week, review SSC documents, follow up on rate making matter.
5.	1.50	Review payroll progress report from Amber on Sunday afternoon, follow up with team, review issues related to Polly work on protecting SSC assets for company, review DOE new rules for gas reporting matters, review vendor matters and follow up for Paul, follow up on matters related to the move, timing and rate issues, review file on rate matters, review agenda for the accounting CLE for Amber Polly coordinating, follow up on rate matters
6.	1.25	Follow up on disposal matter, follow up with on rate matter and timing of

.25 = 15 minutes
 .5 = 30 minutes
 .75 = 45 minutes
 1.0 = 60 minutes

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		case, follow up on operational matter, review note from Jim Sells, review personal matters and job description for the new office space, follow up on community matter, get back on local government matter, review letter draft on vendor matter, review noncompete matters, edit letter, leave message for Paul.
7.	2.25	Discuss vendor matter with Paul, review community matters with Paul, discuss the new space and personal matters, discuss transportation matters, review SSC historical matters, preparation for transportation related issues for SSC, review memo from Jim Sells, discuss drivers and new space arrangement, follow up on space and service crew, follow up on G certificate matter, review newest design drawing, details of the move, logistics, follow up on new DOE proposed rules for gas reporting apply to SSC, follow up on matter from Rodd.
8.	5.50	Attend transportation meeting for SSC related to county roads and funding, weight limits, deliver SSC material on transportation to Jim, talk with Gene about transportation issues, follow up with Paul on new space and use by customer staff, review board matter for SSC, follow up on customer matter.
9.	1.75	Work on transportation matter, follow up with Paul on SSC matter, review issues related to the accounting seminar for Amber and Erin next week, review local issues related to haulers and disposal matters, review issues concerning G and CC certificate enforcement roles of the commission and WSP as impacts illegal hauling in Whatcom county and report to the WSP by Paul, follow up on illegal solid waste hauling, health issues and commission enforcement, review commission review of Rubbish Works report and complaints, review Whatcom county support of SSC solid waste programs, follow up on matters related to proposed new solid waste taxes on SSC county service.
10.	1.75	Review issues related to WAC meeting, parties and agenda, issues to cover for SSC, patent and protection memo review from attorney, follow up from Polly and Rodd, review report from DOE for solid waste meeting next week, follow up on transportation matters for SSC, review issues with Paul related to time to answer phones at SSC, review customer matter, follow up on moving matters, issues to address, timing for move, work stations.
11.	1.50	Review operational issues at SSC, review rate making matters, review union issues and timing for negotiations in the fall to be incorporated into the rate case, follow up on matters for Paul, follow up on matters related to DOE meeting on solid waste at end of next week, review comments and issues for DOE solid waste meeting.
12.	1.00	Review SSC documents from Paul, review material from Polly for meeting on Monday, review operational and fiscal matters, follow up on Board matter, review work by Rodd on protecting SSC, transportation matter to follow up, review operational matter.
13.	1.75	Review information from the session on ratemaking for Amber and Erin

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		in Seattle with solid waste companies, review Jeff's comments from meeting and get back to Jeff and Paul, follow up on matter related to testing water for permit for SSC, local community follow up matter, review WSDOT matter impact SSC operations, review matters related to union bargaining for SSC, follow up on regulated matter, review issues related to the G certificate and property rights, review matters related to protection for the company and certificate, follow up on operational matters, review memo on office operations and answering the calls, follow up on fiscal matter.
14.	1.50	Review matters relating to the move, review issues on employment issues, maturity and medical leave for employee, review SSC documents from Paul, review issues related to training for SSC employees, follow up on matter for SSC vendor, review parking matters, dye testing for permit for SSC, check matter on new employees at SSC, management of customer calls, look at staggered work hours to manage calls to change service matters, preparation for DOE solid waste meeting later in the week, follow up matter from Rodd on community issues, review issues on waste characterization on regulated hauls, new approach and draft from Lisa to customers, attend meeting on permit for SSC and related matters, follow up on commission related matter and issues from the meeting, confer with Gene on matters of interest to SSC operations.
15.	4.50	Attend meeting on transportation issues that impact SSC, follow up on matter on transportation in Whatcom county relating to tow trucks and safety on the road for our drivers, talk to Gene about general SSC transportation issues, follow up on transportation matter from Paul, review again waste characterization matter for SSC, review issues about solid waste pick up schedule, review matter of individual pick up of solid waste load that has turned bad and customer call, get right on it by SSC for good customer service, review banking issues from Jeff and Paul, review agenda from Ed on the Whatcom county SWAC coming up next week, Ed will attend, memo on electrical matters in the new space, drawings for Paul, permit to be approved by the city, related issues to the move.
16.	2.25	Review memo from Rodd on community matters, review issues in Rodd's memo, follow up on matters in Rodd's memo, review memo back from attorney to Paul on SSC legal matters, comments from Rodd and others, review comments from Polly on legal issues, review Jeff comments on BBR matters and progress on issues related to commission matters and certificate, review matters related to customer questions for solid waste service, review issues related to CORE operational questions, data from the system to be used by Paul for operational decisions and management, review attorney follow up for Paul, review employee leave issues and follow up and check with experts in the field on legal matters related to employee leave and employer responsibility, follow up on floor planning for new space, permit issues and related matters, follow up on

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		DOE and WUTC matters that impact SSC.
17.	6.45	Attend DOE meeting in Lacey on solid waste rules and regulations changes they propose that impact SSC and Whatcom county regulated operations, follow up with other haulers to discuss, discuss with Polly legal and operational issues, discuss fiscal and filing issues with Jeff and Polly for the rate case, test period to end this month, follow up on commission matters with other haulers who have had recent rate filings, follow up with SSC management on personal and operational matters, follow up on summary of the DOE meeting, send information to Paul on DOE meeting, follow up on illegal hauling in Whatcom county issues.
18.	1.75	Review employee schedules and timing issues, follow up on operational issues as relate to the new space planning and customer service, review issues from Rodd, review material on Whatcom county waste characterization and new SSC plans to explain new rules to customers, draft memo to customers from Lisa, follow up with Paul on operational matters, follow up on matter from Polly, review regulatory issues, legal issues related to regulatory matters, follow up on matters related to the DOE possible changes in solid waste rules and operations as impact SSC, call Paul and leave message.
19.	1.25	Preparation to represent SSC at owners meeting next weekend, review matters for presentation and issues to discuss for SSC, check on agenda for owners meeting and issues including Rodd's presentation, review operational issues from Jeff and Paul, follow up on matter from Paul, review work space plan, follow up on space and related issues for new office, follow up on rate and filing matters for rate case, issues related to end of the test period, review tax matters impact SSC.
20.	2.25	Review issues related to legal protection for SSC, review options and Paul's decision, review employee schedules, review report on new employees, review tax matters impact SSC and attend meeting on tax issues that impact SSC, preparation for ownership meeting this weekend, review memo from WUTC on certificate, Paul's review, Ed's review, Jeff's review, Polly's memo and Ed's response to staff, review information from the commission on enforcement of permits and illegal hauling, follow up on legal issues related to illegal hauling in Whatcom county, review operational matters, follow up on community matter.
21.	1.75	Review copy of memos legal protection for SSC company symbols, review legal memos and filings for federal and state coverage, review county matters, follow up on neighborhood matters for SSC, make calls and follow up on business matter from Paul's review of north county area, review retirement policy and implementation for SSC and investments, review employee matter, preparation for company meeting on weekend, review map for G-14, review commission questions and responses from SSC staff, follow up on operational matters, preparation of financial material for rate case and internal review, review employee vacation information and coverage issues, follow up on customer matter.

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22.	2.50	Meeting with association of counties on issues related to Whatcom county, executive and county council policy and related issues, discuss issues related to new disposal options in western Washington that could impact price paid by SSC for disposal in Whatcom county, stop at Department of Revenue for information on tax issues impact SSC, review WUTC issues and memo from Ed on decision by staff on map and description of G-14, review memos from commission, notes from Ed, Polly and Jeff and final product from the commission, review memo from Rodd on incident response report for SSC, follow up on operational matters, review SSC material in mail from Paul, follow up matters for Paul related to Whatcom county community issues.
23.	1.75	Talk with Polly about SSC rate case related matters and other solid waste issues impact SSC, review with Polly disposal price matters impact SSC, review material about permit and build out for the new space, check again on vendor matter for SSC in the county, talk with Paul about operation and community matters, note to community group about activities of interest to SSC, talk to Don about visit to SSC for community recognition, follow up on community matter, review memo on preparation by SSC team for work on rate case filing, review issues for end of rate period end of this month, follow up on operational matter.
24.	7.75	Attend meeting of solid waste company owners for SSC, talk with Rodd about operational issues, keep Paul in touch on progress of the meeting, talk about commission matters and issues impacting rates for companies, review legal issues for SSC at the meeting, follow up with other haulers about SSC matters, review common rate and local government matters, follow up from meeting and preparation for second day.
25.	5.25	Attend second day of solid waste owners and operators meeting for SSC, check in with Paul on operational issues, check on local matter in the county, talk with Rodd on SSC matters, talk with Calvin about Whatcom county matters, follow up on Whatcom county matters.
26.	1.25	Get back to Polly on regulatory matter, follow up with Paul on administrative and operational issues, look at trip to Bellingham on Friday for meetings, review SSC matters send from Paul, follow up on matters from owners meeting, review local matter for trip, work on county project for the coming weeks.
27.	1.75	Follow up on operational issues from Paul, review DOR draft rule on tax issues that could impact SSC operation and business, discuss DOR matters with other interested parties for SSC, review information from Rodd on sponsorships for SSC, review community matters in Whatcom county, more work on tax related matters, review issues from meeting with other haulers and follow up for SSC, provide information related to vendor matter.
28.	1.50	Review material from Paul on company operations, review memo from Rodd, update on Bekki, follow up on a matter regarding Polly session on rate case issues, follow up with Allied Waste on common matters, review

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		community matter and follow up for Paul, review taxation matters for SSC in preparation for meeting with DOR tomorrow, follow up on rate case and timing issues considering commission schedule for 2011, follow up on changes in commission staff and impact on rate cases, review county matters, Whatcom county policy and meeting with Rodd and counties in November, review filing info on SSC protection from Graham and Dunn.
29.	1.75	Follow up on employee matters, review employ schedules, check with local officials on SSC matters, review operational matters, review messages from Rodd, reschedule my trip to Bellingham for next week, review tax matters for DOR meeting, review county matter for impact on SSC, follow up on disposal rate and processing issues, follow up on illegal hauling complaint at the commission and their review, follow up on illegal hauling factual situation and next steps, review issues coming to end of the test period for next rate case, follow up on board matters.
30.	3.25	Review issues related to filing for rate case, looking at 12/15 filing day and earlier effective date than required to give plenty of staff time, review report on meeting about filing from Jeff, attend meeting on DOR tax matters impact SSC, follow up on the tax meeting and send information from the meeting to Paul to review, follow up on local issues and meeting with local government folks next week when in Bellingham.
Total	75.95	

.25 = 15 minutes
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Amber Jones

From: Demas, Layne (UTC) [LDemas@utc.wa.gov]
Sent: Thursday, April 01, 2010 3:59 PM
To: Amber Jones
Subject: FW: 3 ring binder

Hi, Amber, I took some time early this week to look over the binder pretty good. It seems to do the job. Much better than the cryptic process Ed had been using all these prior years. Will make things easier here to allocate costs and is good especially if we get some outside interested party wanting to challenge the allocation process.

Thanks, layne

From: Demas, Layne (UTC)
Sent: Monday, March 22, 2010 2:05 PM
To: 'Amber Jones'
Subject: RE: 3 ring binder

Hi Amber. I gave it a fairly quick look over. I'll have to look at it again to refresh my memory. Nothing popped out the first time that caught my attention. I'll look it over again and IF I have any questions or feedback I will let you know.

Thanks, Layne

From: Amber Jones [<mailto:Amber@ssc-inc.com>]
Sent: Monday, March 22, 2010 8:26 AM
To: Demas, Layne (UTC)
Subject: 3 ring binder

Layne –

Good morning.

Have you had a chance to review the 3 ring binder that Pat Dunn delivered to Gene awhile back in response to his request for additional support for Sanitary Service Company's timesheet allocations for roll – off drivers?

I just want to make sure this new process facilitates the additional transparency staff was seeking in regards to our time allocations for roll off drivers, especially now that we are in the test period for our next rate case.

Any feedback you can give me on this is greatly appreciated.

Amber