

TG-230347

May 9, 2023

Via UTC Portal

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
P.O. Box 47250
Olympia, Washington 98504-7250

Received
Records Management
Apr 20, 2023

Re: Revised Petition for Exemption of Murrey's Disposal Company, Inc. d/b/a Olympic Disposal, G-009 to Correct Tariff Page Reference and for Relief from Miscellaneous Tariff Filing Requirements

Dear Ms. Maxwell:

Enclosed is a filing to correct an obvious ministerial error which apparently occurred during the previous submission of revisions to Tariff No. 24 of Olympic Disposal Inc. on November 15, 2021. That single-item filing was to adjust rates applied to two paper mills in Clallam and Jefferson Counties which had not been revised since 2011.

The error which occurred in that filing was to Note 2, which inadvertently specified a mileage rate of \$2.35. As a review of revised Tariff Page No. 39 reveals, there was no required symbol of adjustment associated with the mileage rate there specified which evinces a lack of intent to change that rate. The actual mileage rate in Note 2, Item 260 at that time was \$3.84 which had been previously revised under Docket No. TG-200645, effective September 1, 2020, as reflected in Exhibit 1 attached hereto.

The submission under Docket No. TG-210912, Note 2, Fourth Revised Tariff Page No. 39 in November, 2021 mistakenly referenced a mileage rate of \$2.354 per mile (Exh. 2, attached), and again contained no indication of any intended change from the prior revision more than a year earlier. In short, the rate on that page inadvertently defaulted to a superseded rate page that had been revised upon review and approval by the Commission some fourteen months earlier.

As is obvious from a review of the next consecutive item, Item 265 (Third Revised Page No. 40 which differs from Item 260 only due to customer-owned containers and is inapplicable to paper mill customers), the mileage rate there is \$3.84 which similarly reflects the approved mileage rate revision in TG-200645.

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The current mileage rate in Note 2, Tariff Item 260 also has no impact upon the two mill customers which have flat fee rates as presented in Note 4 on that page and, which in contrast to Note 2, do appropriately show the "A" symbol denoting adjustment on the Fourth Revised Tariff Page 39. Thus, only roll off customers are implicated by current Note 2, and for which again there was no change intended to the rates approved in the prior docket filing. For your information, this mileage rate discrepancy was only recently identified by the Company as it prepared to address a compliance filing for Tariff Item No. 260 and for which it has just sought relief in the form of extension of time to facilitate an overall general rate filing for Olympic later this year.

Based on the foregoing, Murrey's Disposal Company, Inc. d/b/a Olympic Disposal ("the Company"), pursuant to both WAC 480-07-110 and WAC 480-70-051, asks that the Fourth Revised Page 39, Tariff No. 24 in TG-210912 be cancelled, and that the appropriate rate of \$3.84 be reinstated as shown in the proposal in Exhibit 3, due to the obvious "scrivener error" when the prior, superseded mileage rate in Note 2 was inadvertently defaulted to the previous Note 2 which had been revised under Docket TG-200645 and which was effective September 1, 2020 by order of the Commission. The Company, in seeking this exemption in these extraordinary circumstances, is also seeking relief from the workpaper requirements of WAC 480-07-520 (4) and the tariff filing requirements in WAC 480-70-326 (2) & (3) and the customer notice requirements in WAC 480-70-271, as this is requesting an administrative correction, not a revision, to current rates.

Please contact the undersigned if you have any further questions or require any more specification of this request for exemption and correction of this inadvertent error.

Yours truly,



Lindsay Waldram
Senior Pricing Analyst
Waste Connections, Inc.

Attachments

cc: Adam Balogh
David W. Wiley