

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

ISLAND DISPOSAL, INC.

Case No. TG-220100

PETITION FOR EXEMPTION UNDER WAC
480-07-110 AND REQUEST FOR
EXTENSION OF TIME

I. EXEMPTION REQUEST

1 Pursuant to WAC 480-07-110, Island Disposal, Inc., Certificate G-154, PO Box 990 Coupeville, WA 98239 (“IDI” or “Company”) files the following Petition for Exemption seeking an extension of the original tariff effective date of November 1, 2023. This request is submitted to provide it additional time to continue preparing a comprehensive general rate case as anticipated in Order 01, TG-220100 which originally set forth the successive general rate filing deadline at issue.

II. BASIS OF REQUEST

2 IDI here seeks an additional six-month extension to the current tariff effective date to May 1, 2024 for a number of reasons. First, it is and has been exploring enhancing its current service options on Whidbey Island and is now working internally on 2024 capital budgets with corporate headquarters to authorize purchase of necessary additional automated equipment and carts and containers to roll out a subscription curbside recycling service in 2024 which Whidbey Island currently lacks. IDI is also working with County and local community groups to model such a program and make a determination as to the logistics of prospective rollout and how to best implement a phased-in approach in select locales with eventual service to all regulated customers on

Whidbey Island. IDI is thus currently attempting to coordinate both internal and external efforts to implement the program which obviously implicates material proforma adjustments to the rate base. Because of this contingency, IDI believes it would be prudent and a cost saving for the company, staff and customers alike to avoid having to submit two general rate cases in rapid succession in late 2023 and the first half of 2024 should this service level option in fact be implemented.

3 While, due to current commodity markets and lingering supply chain issues it is not possible to predict with certainty or pinpoint when this curbside recyclable service could become a reality, the possibility militates in favor of an extension of a general rate case submission and tariff effective date in order to accommodate this important potential customer service enhancement.

4 There are also additional factors weighing in favor of extending these dates. As of July of this year, the IDI District hired a new controller who is still grappling with accounting and reporting systems familiarity and functioning and in compiling the necessary accounting reports to reconcile the 12-month test period with supporting workpapers with confidence in the comprehensiveness and accuracy of the data to support a general rate case.

5 Moreover, it appears that one of the pivotal items adjusted by staff in the previous rate case based on a projection by the Company overestimated the amount of overtime work hours that would be eliminated by automation. The Company is focusing on these assumptions and the results of operations since April, 2022 to document actual overtime hours to modify and revise that calculation.

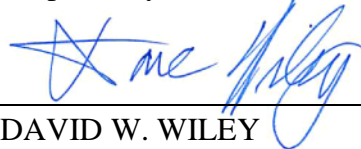
6 Finally, due to the costs of servicing a largely rural territory and the fact that, geographically, Whidbey is the fourth largest island in the continental United States, some assumptions about the cost efficiency involved in automating collection routes may have been overly optimistic and adjustment of related expenses accordingly is underway with the results of that effort still preliminary. Until then, an additional period of months to continue to compile reporting data would again improve reliability and accuracy of those data supporting a general rate case submission.

III. PRAYER FOR RELIEF

7 Wherefore, having outlined the basis of this request for exemption from rule under WAC 480-07-110, and the concomitant request for continuance of the current tariff effective date under WAC 480-07-130, and at least analogously, WAC 480-07-385(1), IDI asks that its Petition be granted in the public interest and that additional time be afforded it to file a general rate case with a tariff effective on or before May 1, 2024.

Dated this 28th day of September, 2023.

Respectfully submitted,



DAVID W. WILEY
Attorney for Island Disposal, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2023, I caused to be filed and served the foregoing document to the following via the UTC web portal:

Ms. Kathy Hunter
Acting Director and Executive Secretary
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