

September 29, 2010

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VIA EMAIL to WUTC RECORDS CENTER/  
ORIGINAL VIA FIRST CLASS MAIL

David Danner, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
Attention: Records Center  
P.O. Box 47250  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250

Re: Docket No. A-042090; Staff Investigation to Rescind Fuel Surcharge Mechanism

Dear Mr. Danner:

On behalf of the various Waste Connections, Inc. regulated solid waste collection companies operating in Washington, including Murrey's Disposal, American Disposal, Harold LeMay Enterprises, Waste Connections of Washington, Mason County Garbage, Yakima Waste Systems, Island Disposal and Empire Disposal, this is to briefly indicate our opposition to the rescission or cancellation of the process instituted in 2005 to authorize temporary fuel surcharges in solid waste collection company rates. We have also reviewed the comments of the Executive Director of the Washington Refuse and Recycling Association and endorse the sentiments raised by that letter in this docket.

While most of WCI's operating companies do not currently utilize fuel surcharges, we believe that retention of the mechanism is important, particularly for smaller and rural operating solid waste collection companies, where fuel volatility is a significant risk. We also don't think the future can be foretold based on the last approximate 18 months of greater stability in fuel prices and unique (if adverse) economic times and recommend the Commission, in its reasonable discretion, retain the mechanism for those haulers who meet current eligibility criteria and seek adjustments in rates caused by fuel cost escalation.

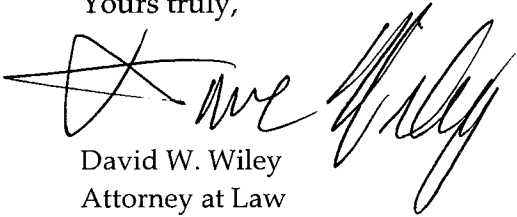
Finally, we consider removal of the surcharge option for submission to the Commission for approval will ultimately diminish ratemaking flexibility, efficiency, and responsiveness both for the

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affected solid waste collection companies and the Commission, in exercising its statutory obligation to establish fair, just, reasonable and sufficient rates.

Yours truly,

A handwritten signature in black ink, appearing to read "David W. Wiley". The signature is stylized and written over a large, faint, circular watermark or stamp that is partially visible.

David W. Wiley  
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[dwiley@williamskastner.com](mailto:dwiley@williamskastner.com)

DAV:lct  
Encl.

cc: Client