



King County

Solid Waste Division

Department of Natural Resources and Parks

King Street Center

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TTY Relay: 711

June 15, 2010

David Danner, Secretary and Executive Director
Attention: Gene Eckhardt, Assistant Director
Washington State Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

RE: Waste Management of Washington, Inc. Recycling and Revenue Sharing Plans

Dear Mr. Danner:

The purpose of this letter is to provide King County's comments regarding the effectiveness of the Waste Management of Washington, Inc (Waste Management) 2009 - 2010 revenue sharing and recycling plan for King County, and to offer support for a new recycling plan that will extend revenue sharing from September 1, 2010 through August 31, 2011. The plans referenced herein apply to the areas defined in Tariff 15 (Waste Management -- Sno-King) and Tariff 22 (Waste Management -- South Sound Seattle) in Waste Management's G-237 certificate.

2009 - 2010 Plan

In June 2009, King County certified that a recycling plan submitted by Waste Management for the one-year period ending June 30, 2010 was consistent with the policies of the King County Comprehensive Solid Waste Management Plan. Waste Management's plan was subsequently extended until August 31, 2010. The plan included a recommendation from King County that Waste Management be allowed to retain 30 percent of commodity revenues during the plan period.

Waste Management satisfactorily fulfilled the terms of the 2009 - 2010 recycling plan, and King County is not requesting that they be required to return any of the revenues that were retained by the company during the plan period. Based on information provided to us by the company, the pounds per household recycled during the plan period increased by one percent in the South Sound Seattle tariff area and seven percent in the Sno-King tariff area.

2010 – 2011 Plan

Waste Management and King County have come to an agreement on a new recycling plan for the Sno-King and South Sound Seattle service areas for the period beginning September 1, 2010 and ending August 31, 2011. A copy of the plan signed by both parties will be transmitted to you separately.

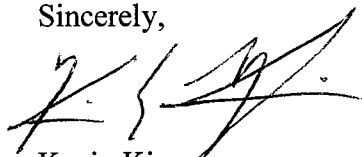
We recommend that the Washington Utilities and Transportation Commission (WUTC) allow Waste Management to retain 50 percent of the revenues from sale of commodities during this period. King County will evaluate Waste Management's implementation of this plan prior to its expiration. If some elements have not been fully implemented, King County may request that WUTC consider returning some of these revenues to customers. A new recycling plan must be agreed upon by both King County and Waste Management before we will recommend extension of revenue sharing after August 31, 2011.

In my position as Solid Waste Division Director, I have been delegated the authority to make the certification of this plan required in RCW 81.77.185. I hereby certify that the plan submitted to you by Waste Management is consistent with the King County Comprehensive Solid Waste Management Plan. Statements in the solid waste plan that support this certification include the following:

- "The cities and County will maintain and enhance the current residential collection service levels for recyclables." (pages 4 - 31)
- "(T)he County and the cities will continue to research the benefits of using a commingled collection system, changing the frequency of collection and adding materials for collection." (pages 5 - 18)

Thank you for providing us the opportunity to support continuation of Waste Management's Recycling and Revenue Sharing Plan. If you have any questions, please contact Bill Reed, Program Analyst, at 206-296-4402, or bill.reed@metrokc.gov.

Sincerely,



Kevin Kiernan
Division Director

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cc: Susan Robinson, Director, Public Sector Services, Waste Management