

COST ASSESSMENT GUIDELINES

FOR LOCAL SOLID WASTE MANAGEMENT PLANNING

Third Edition, Revised October 2019



Washington Utilities and Transportation Commission Version 4

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1. Process Overview

1.1. Purpose of the cost assessment guidelines

The purpose of the cost assessment guidelines is to help local governments prepare cost assessments for their solid waste management plans (SWMP). Counties or cities should prepare their cost assessments so that impacts on solid waste haulers and their ratepayers are easy to determine. If a local government does not have Washington Utilities and Transportation Commission (UTC)-regulated collection companies in its jurisdiction, the commission will not review the plan. Instead, the Washington Department of Ecology will consider in its review whether or not the plan adequately meets the cost assessment requirements.

Every local government with a UTC-regulated collection company within its jurisdiction must complete a cost assessment pursuant to these guidelines and state law.¹

The cost assessment:

- is a comprehensive, system-wide review of a solid waste plan's costs,
- considers the dollar impact on ratepayers of the plan's recommendations, and
- provides sufficient information to estimate future rate levels over the plan period.

The cost assessment is beneficial to:

- local elected officials and staff who may use the cost assessment process as an evaluation tool for selecting preferred solid waste management system alternatives,
- UTC commissioners and staff who use cost assessments to obtain information about probable future rate increases and policy directions set by local governments,
- solid waste advisory committee members who can use cost assessments to evaluate solid waste systems and estimate costs of implementing proposed plans,
- UTC-regulated solid waste collection companies that can use assessments to plan for future capital and operating expenditures, and
- citizens who pay for solid waste management systems through solid waste collection bills and tipping fees and can use cost assessments to estimate future expense levels. This information can help the public provide input to local officials about their solid waste program preferences. The information can also further citizen understanding of the rate setting process.

1.2. The Washington Utilities and Transportation Commission

The UTC is composed of three commissioners who are appointed by the governor and confirmed by the Senate to six-year terms. The commissioners are supported by a staff of accountants, economists, engineers, consumer program specialists, and special investigators.

The commission regulates privately owned utility companies, including energy, telecommunications, natural gas, water, and transportation companies, including low-level nuclear waste, solid waste, and medical waste companies. The commission is primarily an economic regulator, but it also regulates the airporter, solid waste hauling, railroad, and oil and gas pipeline industries for safety.

Chapter 81.77 RCW sets forth the UTC's role in solid waste management. The commission grants authority to operate, approves rates, prescribes accounting formats, and requires regulated companies

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¹ RCW 70.95.090(8) and RCW 70.95.096

to file annual reports. However, RCW 81.77.22 provides exemptions from regulation for a municipality, or any solid waste or recycling company providing solid waste collection service under contract for a municipality. In addition, any recycling company providing service solely to commercial customers are federally exempt.

The commission's responsibility to approve rates makes the UTC directly accountable to ratepayers. The commission's goals are to ensure that rates charged by regulated companies are fair, just, reasonable, and sufficient. Cost assessments prepared according to these guidelines provide the commission with information it needs to understand how proposed changes to a local SWMP will affect future rates.

1.3. Relationship with the Washington Department of Ecology

The Washington Department of Ecology's *Guidelines for the Development of Local Solid Waste Management Plans*² and the UTC's *Cost Assessment Guidelines* are mutually supportive. Ecology's guidelines help a local government prepare its SWMP, while the UTC's guidelines help assess the costs of various alternatives considered in the plan.

The UTC reviews the draft local SWMPs autonomous of reviews performed by other parties. Once the UTC review is complete, staff prepares a letter with its recommendations for the commission to consider at an open meeting. Once the letter's recommendations are acknowledged at the open meeting, it is sent to the county or city and Ecology.

2. UTC Rate Setting Process

2.1. Rate Setting Process

UTC-regulated collection companies must file with the commission in order to change rates. The company must file its rate changes in a proposed tariff that the commission must receive at least 45 days before the proposed effective date. Commission staff reviews the company's justification to support the proposed rates as well as the company's books and records. After staff completes the audit and analysis, staff prepares a memorandum to the commissioners explaining findings, conclusions, and recommendations.

The commissioners consider the proposed rates at an open meeting, after reviewing staff's memorandum. The company, customers, and other interested parties may address their concerns to the commissioners in writing or during the open meeting.

Commissioners may approve proposed rates to become effective as scheduled or issue an order suspending the proposed rates in order to look further into whether the request is reasonable. Suspended rates do not become effective as requested, instead, the rates in effect at the time of filing, remain in effect until the commission approves a change.

If rates are suspended, the matter may require a formal hearing before an administrative law judge. This is a quasi-judicial proceeding with attorneys and witnesses providing sworn testimony. The administrative law judge issues a decision, based on the record. Parties can appeal to the commissioners for review, at the end of which the three commissioners issue their own decision. Additional appeals of the commission's decision would go through the court system.

² https://fortress.wa.gov/ecy/publications/summarypages/1007005.html

2.2. How the UTC Sets Rates

When requesting revised or new rates, a company must file a revised tariff along with detailed financial and operational data to demonstrate its proposed rates are fair, just, reasonable, and sufficient. Rates are set to recover the costs of providing service to customers. Although companies are entitled to recover appropriate expenses and earn reasonable returns, they are not entitled to recover imprudent or nonservice related costs.

The rate setting process allocates total company expenses to regulated activities (i.e., garbage service in an unincorporated county), by different service categories (e.g., garbage, recycling, organics), by different service levels (e.g., residential customers with mini cans or commercial customers with 32-gallon cans). The allocations may take place in several different levels.

In determining the company's gross revenues, an adjusted historical test period is used to forecast the period rates will be in effect. Staff adjusts the company's income statement for the test year in two ways: 1) Restating adjustments correct errors and departures from regulatory accounting practice; and 2) Pro forma adjustments revise historical amounts for known and measurable changes in revenue and expenses.

3. Cost Assessment Information

For the reasons outlined above, the UTC reviews the local SWMP's cost assessment and advises the local government of the probable effect the alternatives may have on rates charged by companies regulated by the UTC. This section identifies the information the UTC requires to accurately analyze the cost and rate impacts. UTC staff looks for evidence that the planning jurisdiction:

- considers solid waste management from a comprehensive, system-wide perspective,
- considers the cost impact of its decisions on ratepayers, and
- provides information sufficient to estimate future rate levels.

3.1. Information Needed

To determine the probable effect a SWMP will have on rates, the UTC requires the following information:

- current population and solid waste disposal quantities,
- detailed description of the existing comprehensive solid waste management system(s), including selected alternatives,
- proposed changes in the present solid waste management system(s),
- estimated cost requirements for each component of the solid waste management system(s) for years one through six, including the component costs of recycling programs,
- all sources of funding to be utilized to operate and pay for the system(s),
- the role of the UTC-regulated solid waste collection company(s), and
- information on all the solid waste collection companies in its area.

Factors impacting solid waste rates include population and the number of businesses, the weight of material collected, and collection time required for routes. In addition, the cost of local government programs and supporting infrastructure, and facilities also impact rates.

Expected cost variances over the plan period are important elements needed for assessing rate impacts. RCW 70.95.090(3) requires the local SWMP to contain:

- a six-year construction and capital acquisition program for solid waste handling facilities³, and
- a plan for financing both capital costs and operating costs of the proposed solid waste management system.⁴

The cost data should address capital costs and associated financing options for years one through six. For proper assessment of rate impacts, costs should include both direct and indirect cost information for each component of the solid waste facilities and system(s). All assumptions used to develop the cost data should also be included.

The questionnaire in Section Five outlines the information the UTC needs to assess changes in rates. Completing this questionnaire is not mandatory. We provide it as a tool to help ensure that each plan provides UTC staff the necessary information to complete their analysis. Local governments may use the questionnaire provided or submit comparable information in another form.

3.2. Planning Numbers and Rate Data

The SWMP guides decisions about future activities. Any plan that involves forecasting is subject to uncertainty. Population changes, economic growth or decline, housing construction, fluctuating interest rates, enforcement actions by state or local authorities, changes in state and federal law, and participation levels in recycling programs are just some of the variables in the solid waste equation that will vary between planning and implementation of solid waste programs.

These guidelines are intended to be flexible while assisting local governments in calculating rates based on assumptions outlined in their plan. To provide a clear rationale for its decisions, a local comprehensive SWMP should contain a statement of the county's goals, objectives, and policies. The plan should also contain explicit information on local conditions, various assumptions, and information on existing operations used to support the plan's cost conclusions. During its review, the UTC staff will use these same assumptions, along with current solid waste collection company statistics and data, to estimate changes in rates to customers the plan may cause.

3.3. Direct and Indirect System Costs

During its review, the UTC looks at both direct costs and indirect costs.

An example of a direct cost is a recycling program provided by a UTC-certificated hauler. In this case, the company recovers its program operation costs directly from ratepayers through collection rates. An example of an indirect cost is a surcharge or city tax. The SWMP should provide sufficient information for UTC staff to determine the probable rate impact such as the number of participating households, type and volume of materials collected, frequency of collection, the processing facility to which materials will be taken, and expected markets for recycled materials or costs of disposing nonmarketable recyclable materials.

⁴ RCW 70.95.090(3)(d)

³ RCW 70.95.090(3)(c)

4. UTC Cost Assessment Review

4.1. The Internal Process

State law requires local governments to submit preliminary draft SWMPs to Ecology for review. The commission reviews plan assessments of the impact solid waste collection costs will have on rates charged by solid waste collection companies regulated under 81.77 RCW. Commission staff must complete the review within 45 days of receiving the plan from Ecology.

When the UTC receives a draft plan for review, staff assigns a docket number and schedules it for an open meeting. Once review is complete and the commission has acknowledged the staff recommendations, the review letter is sent to the local government and Ecology.

If UTC cannot make a cost assessment because of missing, imprecise, or unclear information, UTC staff will first contact the local government planner or, if necessary, the Ecology reviewer for clarification. If the local government planner or Ecology reviewer clarifies the information, the commission reviewer will make an assessment. If the commission reviewer still cannot make a cost assessment, the commission will state so in its review letter.

5. Solid Waste Cost Assessment Questionnaire

While the UTC prefers the local government submit information in the provided format, RCW 70.95.090 does not mandate the use of this questionnaire. The local government may provide the requested information in any format it chooses, but it is mandatory that a cost assessment is prepared. Complete and accurate responses will facilitate a quality cost assessment. If the local government does not have the information or does not know the answer, explaining that this information is unavailable is an acceptable response and allows the reviewer to understand areas that call for closer analysis and study.

Each major section of the questionnaire concludes with a subsection titled "References and Assumptions" that allows the local government a place to note sources and references the UTC should know about in preparing the cost assessment. In these sections, the county or city should also report any assumptions made while compiling questionnaire responses.

Once the cost assessment is complete, it may be included with the SWMP as a separate section or an appendix.

⁵ RCW 70.95.094

⁶ RCW 70.95.096

COST ASSESSMENT QUESTIONNAIRE

General Information

Plan prepared for the County of Skamania	
Plan prepared for the City of	
Prepared by Brad Uhlig	
Contact telephone	
(509) 427-3926	
Contact email	
uhlig@co.skamania.wa.us	
Date 6-26-2024 -	
_	
Years	
Throughout this document:	
Year 1 (Base Year) shall refer to 2025	-
Year 2 shall refer to 2026	
Year 3 shall refer to 2027	
Year 4 shall refer to 2028	
Year 5 shall refer to 2029	
Year 6 shall refer to 2030	
Each year shall refer to (check one):	
Calendar year	January 1 – December 31
☐ Fiscal year	Such as July 1 – June 30

1. Demographics

1.1. Population

1.1.1. Provide the total population of your County (excluding cities choosing to develop their own SWMP) for the base year and each of the following five years.

	Table	1.1.1.a.
Year 1	11900	
Year 2	11960	
Year 3	11220	
Year 4	12079	
Year 5	12169	
Year 6	12262	

1.2. References and Assumptions

Population estimates are from the OFM (2022 projections, medium series).

2. Waste Stream Generation

Provide the information below related to solid waste and recycling. Disposal refers to those tons disposed of at a landfill, incinerator, transfer station, or any other form of disposal you may be using. If other, please identify.

2.1. Tonnage of Solid Waste Disposed

2.1.1. Provide the total tonnage of solid waste disposed of in the base year and each of the following five years.

		Table 2.1.1.a.
Year 1	8757.93	
Year 2	8845	

Year 3	8932	
Year 4	9019	
Year 5	9106	
Year 6	9193	

2.2. Tonnage of Recyclable Materials with a Market⁷

2.2.1. Provide the tonnage of recyclable materials recycled in the base year and each of the following five years.

		Table 2.2.1.a.
Year 1	995.17	
Year 2	1040	
Year 3	1080	
Year 4	1120	
Year 5	1160	
Year 6	1200	

2.3. Tonnage of Recyclable Materials without a Market

2.3.1. Provide the tonnage of recyclable materials disposed of in the base year and each of the following five years.

		Table 2.2.1.a.
Year 1	0	
Year 2	0	
Year 3	0	
Year 4	0	

⁷ RCW 90.95.090(7)(c)

	0
Year 5	
Year 6	

2.4. References and Assumptions

3. Collection Programs

3.1. Regulated Solid Waste Collection Programs

Provide information for each UTC-regulated solid waste collection company operating in your jurisdiction for the base year and each of the following five years.

Table 3.1.a.							
UTC-Regulated Hauler Name <u>Columbia River Disposal</u>							
G-Certificate#		48					
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	
Residential							
# of customers	2183	2243	2303	2363	2423	2483	
Tonnage collected	2885	2964	3043	3122	3201	3280	
Commercial							
# of customers	314	319	324	329	334	339	
Tonnage collected	1563	1583	1603	1623	1643	1663	
	Table 3.1 h						

Year 1	Year 2	Year 3	Year 4	Year 5	Year 6			
	Тал	ble 3.1.c.						
UTC-Regulated Hauler Name								
Year 1	Year 2	Year 3	Year 4	Year 5	Year 6			
		Name	Table 3.1.c.	Table 3.1.c. Name	Table 3.1.c. Name			

3.2. Cost & Funding for Solid Waste Programs

Provide information for solid waste programs that have been implemented and/or proposed. Include costs and proposed funding mechanism. If these programs are discussed in the SWMP, provide the page number in the draft plan on which it is discussed.

Table 3.2.a.					
Implemented					
Program	Cost	Funding	Page #		

		Table 3.2.b.		
	Program	Proposed Cost	Funding	Page #
3.3.	References and Assu	umptions		
4.	Waste Reduction	n (Recycling and Organ	ics)	
4.1.	Recycling			
4.1.1.	Regulated Recycling (Collection Programs ⁸		
	e information for each U ear and each of the follo	TC-regulated recycling company wing five years.	operating in your jurisdiction f	for the
		<u> </u>		

⁸ RCW 70.95.090(7)(c)

		Tak	ole 4.1.1.a.			
UTC-Regulated Haule	r Name					
G-Certificate#						
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Residential						
# of customers						
Tonnage collected						
Commercial						
# of customers						
Tonnage collected						
		Tak	ole 4.1.1.b.			
UTC-Regulated Haule	r Name					
G-Certificate#						
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Residential						
# of customers						
Tonnage collected						
Commercial						
# of customers						
Tonnage collected						
		Tak	ole 4.1.1.c.			
UTC-Regulated Haule	r Name					
G-Certificate#						

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Residential						
# of customers						
Tonnage collected						
Commercial						
# of customers						
Tonnage collected						

4.1.2. Recyclable Materials

Provide a list of recyclable materials to be collected in accordance with the SWMP. For each item, indicate if there is an active market and if the revenues exceed the cost of processing.

Table 4.1.2.a.					
Recyclable Material	Active Market	Revenues > Processing Costs			
Mixed paper	Yes □ No	☐ Yes No			
Cardboard	Yes □ No	Yes □ No			
Glass	Yes □ No	□ Yes No			
Aluminum cans	Yes □ No	Yes □ No			
Tin cans	Yes 🗆 No	□ Yes No			
PET #1	Yes 🗆 No	□ Yes No			
Milk Jugs	Yes 🗆 No	Yes □ No			
Colored #2	Yes 🗆 No	□ Yes No			
Steel - tin	Yes 🗆 No	Yes □ No			
	☐ Yes ☐ No	☐ Yes ☐ No			
	☐ Yes ☐ No	☐ Yes ☐ No			
	☐ Yes ☐ No	☐ Yes ☐ No			
		_			

4.1.3. Costs & Funding for Recycling

Provide information for recycling programs that have been implemented and/or proposed. Include costs and proposed funding mechanism. If these programs are discussed in the SWMP, provide the page number in the draft plan on which it is discussed.

Table 4.1.3.a.		
Cost	Funding	Page #
\$180,000 yr.	Ecology Grants and Tipping fees	5.5.1 &5.5
		Pg 37
	- '	
Table 4.1.3.b.		
Proposed		
Cost	Funding	Page #
	Implemented Cost \$180,000 yr. Table 4.1.3.b. Proposed	Implemented Cost Funding \$180,000 yr. Ecology Grants and Tipping fees Table 4.1.3.b. Proposed

4.2. Other Waste Reduction Programs (Organics, such as Yard Waste and Food Waste)

4.2.1. Regulated Organics Collection Programs

Provide information for each UTC-regulated company collecting organics operating in your jurisdiction for the base year and each of the following five years.

		Tab	le 4.2.1.a.			
UTC-Regulated Haule	r Name					
G-Certificate#						
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Residential						
# of customers						
Tonnage collected						
Commercial						
# of customers						
# Of Customers						
Tonnage collected						
		Tab	le 4.2.1.b.			
UTC-Regulated Haule	r Name					
G-Certificate#						
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Residential						
# of customers						
Tonnage collected						
Commercial						
# of customers						
Tonnage collected						

4.2.2. Costs & Funding for Organics Collection Programs

Provide information for programs for collecting organics that have been implemented and/or proposed. Include costs and proposed funding mechanism. If these programs are discussed in the SWMP, provide the page number in the draft plan on which it is discussed.

	Table 4.2.2.a.		
	Implemented		
Program	Cost	Funding	Page #
	Table 4.2.2.b.		
Program	Proposed Cost	Funding	Page #
. rog.a	2031	i anamg	· uge »
			<u> </u>
			
			<u> </u>
			<u> </u>
1.3. References and Assur	nptions		
1.3. References and Assur	nptions		
1.3. References and Assur	nptions		
1.3. References and Assur	nptions		
1.3. References and Assur	nptions		

5. Disposal

- 5.1. Energy Recovery & Incineration (ER&I) Disposal Programs
- 5.1.1. ER&I Facilities:

		Table 5.1.1.a.		
	Faci	ity	Facility	
Name				
Location				
Owner				
Operator				
			erials that cannot be proces	ssed for the
		Table 5.1.2.a.		
Facility				
Year 1		,		
Year 2				
Year 3		_		
Year 4				
Year 5				
Year 6				
5.1.3. Costs &	Funding for ER&I Pro	ograms		
proposed fundir		programs are discusse	mented and/or proposed. In d in the SWMP, provide the	
		Table 5.1.3.a.		
Progra	am	Implemented Cost	Funding	Page #
0			J	J

		Table 5.1.3.b.		
		Proposed		
Pro	gram	Cost	Funding	Page #
				'
5.1.4. Ash D	Disposal Expense			
Provide the ex	xpected costs ash	disposal.		
		Table 5.1.4.c.		
		Tuble 5.1.4.t.		
	An	nount of Ash	Cost	
Year 1				
Year 2				
Year 3				
		-		

5.2. Land Disposal Program

Year 4

Year 5

Year 6

5.2.1. Land Disposal Facilities

Provide the following information for each land disposal facility in your jurisdiction that receives garbage or refuse generated in the county.

	Table 5.2.1.(.	
	Facility	Facility
Name		
Location		
Owner		
Operator	_	
5.2.2. Regulated Di	sposal	
Provide the tonnage o	lisposed of at each facility by UTC-regula	ted haulers.
	Table 5.2.2.a.	
Facility		
Year 1		
Year 2		
Year 3		
Year 3 Year 4		
Year 3 Year 4 Year 5		
Year 2		
Year 3 Year 4 Year 5 Year 6 .2.3. Non-Regulat		-regulated) haulers and other contributors.

Year 1				
Year 2				
Year 3				
Year 4				
Year 5				
Year 6	_			
Provide infor	posed funding me	R&I Programs sposal programs that have been echanism. If these programs are chich it is discussed.		
		Table 5.2.4.a.		
		Implemented		
	ogram	Cost	Funding	Page #
		Table 5.2.4.b.		
_		Proposed		
Pro	ogram	Cost	Funding	Page #

5.3. References and Assumptions

6. Administration Program

6.1. Costs & Funding for Administration Programs

Provide information for administration programs that have been implemented and/or proposed. Include costs and proposed funding mechanism. If these programs are discussed in the SWMP, provide the page number in the draft plan on which it is discussed.

	Table 6.1.a.		
	Implemented		
Program	Cost	Funding	Page #
			
	- <u> </u>		
	Table 6.1.b.		
	Proposed		
Program	Cost	Funding	Page #
			
			<u> </u>

6.2. References and Assumptions

7. Other Programs

7.1. Programs

For each program in effect or planned that does not readily fall into one of the previously described categories please fill in the following table.

			Table 7.1.a.			
Program						
Page #						
Owner/Operator						_
UTC Regulations	☐ Yes	□ No	Yes	□ No	☐ Yes	□ No
Anticipated Yearly Costs						

7.1.1. UTC Regulation Involvement

If UTC regulation is involved, please explain the extent of involvement.

7.2. Costs & Assumptions of Other Programs

Provide information for other programs that have been implemented and/or proposed. Include costs and proposed funding mechanism. If these programs are discussed in the SWMP, provide the page number in the draft plan on which it is discussed.

	Table 7.2.a.		
	Implemented		
Program	Cost	Funding	Page #

			_
Household Hazardous Waste Co	bllection \$50,000	Tipping Fees	Pg 64 & 8
Sharps Collection	\$2,500	Tipping Fees	Pg 64
	Table 7.2.b.		
D	Proposed	e di.	D
Program	Cost	Funding	Page #
			_
			_

7.3. References and Assumptions

8. Funding Mechanisms

This section relates specifically to the funding mechanisms currently in use and the ones that will be implemented to incorporate the recommended programs in the draft plan. Because the way a program is funded directly relates to the costs a resident or commercial customer will have to pay, this section is crucial to the cost assessment process. Please fill in each of the following tables.

8.1. Facility Inventory

Facility Inventory							
Facility Name	Type of Facility	Tip Fee per Ton	Transfer Cost	Transfer Station Location	Final Disposal Location	Total Tons Disposed	Total Revenu e Generat ed (Tip Fee x Tons)
Underwood	Drop Box	\$185/ton \$5 scale fee	\$99	1402 little buck creek, Underwood	WASCO LF, OR	71.97	\$22,580
Mt Pleasant	Drop Box	\$185/ton \$5 scale fee	\$96	1111 Mt. Pleasant, Mt Pleasant	WASCO LF, OR	1517.4	\$348,351
Stevenson	Transfer	\$185/ton & \$125/ton over 5 ton plus \$5 scale fee & a flat \$82.65/ton for UTC haulers	\$49	1332 Ryan Allen, Stevenson	WASCO LF, OR	7168.56	\$863,156

8.2. Tip Fee Component

			Table	8.2.a.			
Tip Fee Components							
Tip Fee by Facility	Surcharge	City Tax	County Tax	Transportation Cost	Operational Cost	Administration Cost	Closure Costs
Underwood \$185			1.036	\$99/ton	\$83,906	\$1,125	\$55,000
Mt. Pleasant \$185			1.036	\$96/ton	\$339,160	\$5,460	\$55,000
Stevenson \$185			1.036	\$49/ton	\$369,294	\$13,651	\$200,000

8.3. Tip Fee Forecast

Table 8.3.a. Tip Fee Forecast							
Inderwood Drop Box	\$185/ton	\$185/ton	\$185/ton	\$185/ton	\$185/ton	\$185/ton	
It. Pleasant Drop Box	\$185/ton	\$185/ton	\$185/ton	\$185/ton	\$185/ton	\$185/ton	
tevenson Transfer facility	\$185/ton	\$185/ton	\$185/ton	\$185/ton	\$185/ton	\$185/ton	

8.4. References and Assumptions

Please provide any support for the information you have provided. An annual budget or similar document would be helpful.

8.5. Surplus Funds

Provide information about any surplus or saved funds that may support your operations.