

BEFORE THE WASHINGTON STATE UTILITIES AND  
TRANSPORTATION COMMISSION

In re the Matter of:

Petition for Exemption by Rabanco  
LTD d/b/a Sea-Tac Disposal, Republic  
Services, Rabanco Companies

DOCKET TG-151183

PETITION FOR EXEMPTION FROM  
PORTIONS OF WAC 480-07-520(4)

I COMES NOW Rabanco LTD d/b/a Sea-Tac Disposal, Republic Services, Rabanco Companies (“Sea-Tac Disposal,” or “Petitioner”), 1600 127th Avenue NE, Bellevue, Washington, 98005, by and through its counsel, Williams Kastner & Gibbs PLLC and David W. Wiley, 601 Union Street, Suite 4100, Seattle, Washington, 98101, and hereby petitions the Washington Utilities and Transportation Commission (“the Commission”), pursuant to WAC 480-07-110 and WAC 480-07-370(1)(b), seeking an exemption from certain requirements of the general rate proceeding workpaper filing requirements. The request for exemption is sought as applied to Rabanco LTD as the “Company,” in interpretation and application of the rule requirement in light of the revised Commission policy for stricter enforcement of the general rate case rule and consistent with the Commission’s decision in Order No. 4, TG-091933, *Washington Utilities and Transportation Commission v. Waste Management of Washington, Inc. d/b/a Waste Management of Sno-King* and Order No. 3, TG-091945 in re the *Petition of Waste Management, Inc. d/b/a Waste Management of Sno-King* (March, 2010), (hereinafter the “*Sno-King Order*”).<sup>1</sup>

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<sup>1</sup> Rabanco LTD is comparable to Waste Management of Washington, Inc. (“WMW”), in operating here as a single corporate entity in regulated service with numerous separate operating divisions spanning multiple counties within multiple tariff filing areas.

## I. PRELIMINARY STATEMENT

2 This filing seeks exemptions from specific portions of WAC 480-07-520(4) in asking that  
the Commission not require in this filing, in addition to the substantial workpapers being  
filed herewith under WAC 480-07-520, that certain supporting documents and  
computations be applied to Rabanco LTD, as a whole, as opposed to Sea-Tac Disposal,  
as the tariff-filing entity.

## II. SPECIFIC PORTIONS OF WAC 480-07-520(4) FROM WHICH PETITIONER NOW SEEKS EXEMPTION/RELAXATION OF/FROM THE GENERAL RATE CASE WORKPAPERS FILING RULE

3 Request for Exemption from WAC 480-07-520(4)(a). Petitioner here seeks exemption  
from the workpaper detailed pro forma income statement requirement to the extent that it  
asks that subparts (i) and (ii) for restating “actual adjustments” and “pro forma  
adjustments” be limited to demonstration of the impact upon Sea-Tac Disposal rather  
than Rabanco LTD as a whole.

4 WAC 480-07-520(b). No exemption requested.

5 WAC 480-07-520(c). No exemption requested.

6 WAC 480-07-520(d). Petitioner here seeks application of the subpart 4(d) requirement  
on non-regulated revenue exceeding 10% of total company test period revenue in limiting  
the workpaper computations and submissions to Sea-Tac Disposal, as the tariff-filing  
entity, and further asks that the detailed separation of all revenue and expenses  
requirement in subsection 4(d) apply to intracompany transactions between Sea-Tac  
Disposal as the tariff-filing entity and Rabanco LTD as the company as a whole,  
providing what would be analogously required for disclosure under the affiliated interest

transaction rule of 480-70-079 but for the fact that Sea-Tac Disposal is a part of Rabanco LTD.

7 WAC 480-07-520(e). Petitioner is requesting a partial exemption from the requirement of listing all unregulated operations of Rabanco LTD to the extent that it asks that this requirement be limited to unregulated city contracts and businesses and any transactions or relationships between those Sea-Tac Disposal-based business operations and other Rabanco LTD business entities.

8 WAC 480-07-520(f). Petitioner here seeks limitation of the detailed price-out information and reconciliation requirement of this subpart of the general rate case workpaper rule to be here applied to Sea-Tac Disposal, the tariff-filing entity, only.

9 WAC 480-07-520(g). No exemption requested. (See filing for parent company cost of debt computation).

10 WAC 480-07-520(h). Petitioner hereby seeks an exemption to limit the detailed depreciation schedule applicable to the test period to the tariff-filing entity only, Sea-Tac Disposal.

11 WAC 480-07-520(i). Petitioner asks that the computed average investment calculation requirement be limited to applying only to the tariff-filing entity, Sea-Tac Disposal, in presenting computed average investment information.

12 WAC 480-07-520(j). No exemption requested.

III. ARGUMENT IN SUPPORT OF REQUESTED EXEMPTIONS OF GENERAL WORKPAPER FILING RULE

13 G-12, like Waste Management of Washington, Inc.'s Certificate G-237, contains multiple counties, varying geographic routes and tariff filing divisions comprising Rabanco LTD, of which Sea-Tac Disposal which, along with Lynnwood Disposal, Tri-County Disposal, Eastside Disposal and Rabanco Recycling Companies are all operating divisions.

Combined G-12 operations currently service approximately 37,604 regulated residential customers and 2,535 regulated commercial customers in Snohomish, King and Klickitat Counties. Many of the subparts of WAC 480-07-520, in application, implicate broad swaths of territory and disparate routes and operations in both regulated and unregulated services. Historically, accounting data has been maintained based upon and oriented to those separate operating and tariff-filing divisions and it is thus very difficult to aggregate the various data in its current format to be correlated for "the Company," or G-12, as a whole.

14 Because of the greater detail and reconcilable qualities of the individual division's data reporting for a general rate case, Petitioner believes modification/relaxation of the general rate case workpaper rule for the filing by Sea-Tac Disposal is fully consistent with the public interest as required by WAC 480-07-110<sup>2</sup> and the purposes underlying regulation and applicable statutes, and that exemptions from the general rate workpaper rule should therefore be granted.

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<sup>2</sup> As also found in a prior exemption request in TG-101157, *in re: Rabanco LTD d/b/a Lynnwood Disposal*, Order No. 1 (July, 2010) and in a previous rate filing for Tri-County, *in re: Rabanco LTD d/b/a Tri-County Disposal*, TG-111689 (Oct. 2011) amongst others.



15 Indeed, all of the exemptions here requested under the particular subparts of the rule appear to be consistent with the *Sno-King* Order and numerous exemption decisions since 2009. As in *Sno-King*, the corporate structure of Rabanco LTD d/b/a Sea-Tac Disposal, et al. has numerous distinct regulated and unregulated lines of business within a single corporation operating within numerous counties.

#### IV. PRAYER FOR RELIEF

16 For all the foregoing reasons, Rabanco LTD d/b/a Sea-Tac Disposal, Republic Services, Rabanco Companies respectfully asks that the Commission consider the specific requests for exemption from portions of WAC 480-07-520(4) noted above, and that after due consideration, it issue an order granting the Petition in full, and thereafter, enabling conventional audit and review by the audit staff of the general rate case accompanying this filing.

Dated this 5 day of June 2015.

Respectfully submitted,



DAVID W. WILEY

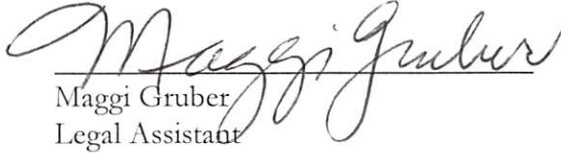
Attorney for Rabanco LTD d/b/a Sea-Tac Disposal et al.

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2015, I caused to be served the original and three (3) copies of the foregoing document to the following address via first class mail, postage prepaid to:

Steven V. King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250

I certify I have also provided to the Washington Utilities and Transportation Commission's Secretary an official electronic file containing the foregoing document via email to: [records@utc.wa.gov](mailto:records@utc.wa.gov).

  
Maggi Gruber  
Legal Assistant