



September 7, 2018

Washington Utilities and Transportation Commission
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Olympia, WA 98504-7250

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UTIL. AND TRANSP
COMMISSION

Subject: Brem-Air Disposal, a division of Waste Management of Washington, Inc. (G-237); Tariff # 20

Enclosed are the revised tariff pages 2, 22 and 25 to the above-referenced tariff. The purpose of these tariff revisions is to reflect the change in the commodity credits for residential and multi-family customers receiving recycling collection services. These tariff revisions reflect a decrease in the current recycling credit from <\$2.55> per month to a credit of <\$0.10> per month for residential customers and a decrease in the current recycling credit of <\$0.60> per unit to a credit of <\$0.19> per unit for multi-family customers.

The decrease in the commodity credit is jointly due to the change in commodity values, tonnages and materials composition since the commodity credit adjustment on November 1, 2017. Furthermore, with this filing we are requesting a deviation from the prior practice of estimating the projected revenues based on the revenues received over the past 12 months. We believe that due to the impacts of China's National Sword policy this is not representative of what we can reasonably expect that commodity values will be over the next 12 months.

Accordingly, we feel that a more reasonable measure of the projected commodity revenues should be based on the most recent six months which is near the time when this policy was implemented on January 1, 2018. We believe this change will mitigate a much larger impact on future changes in the annual commodity rebates. We are requesting that the proposed effective date of these tariff revisions be November 1, 2018.

Enclosed for your review are our accounting work papers. Customers will be notified of the change in their recycling <credit> debit adjustment on their next regularly scheduled billing after approval by the Commission. In addition, the county has been notified of these proposed tariff changes.

If you have any questions or need additional information, please contact or me at (425) 814-7840.

Very truly yours,

Michael A. Weinstein

Senior Pricing Manager, Pacific Northwest Market Area

cc: Rob Rutledge
Laura Moser
Clerk of the Board, Kitsap County Chair