WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSES TO DATA REQUESTS

DATE PREPARED: August 7, 2014

WITNESS:

Melissa Cheesman

DOCKET:

TG-140560

RESPONDER:

Melissa Cheesman

REQUESTER:

Waste Control, Inc.

TELEPHONE:

(360) 664-1251

REQUEST NO. 13: Please provide case cause numbers and corroborating workpapers for Staff's "Three-Factor Allocations" as depicted in Exhibit MC-7 where Staff has applied the same criteria in other recent solid waste general rate cases in the last three years to allocate expenses amongst a regulated solid waste collection company and its affiliates.

RESPONSE:

Objection. Unduly burdensome to request Staff review several years of general rate filings and work papers. The Company has ample opportunity to obtain public documents, conduct an analysis, and present its position.

Without waiving objection, Staff is unaware from memory of a previous rate case applying Staff's recommended three-factor allocation for solid waste companies.