

November 29, 2011

10631.0104

VIA EMAIL AND FIRST CLASS MAIL

David W. Danner
Executive Director and Secretary
Attn.: Records Center and
Dave Gomez, Assistant Director of Water & Transportation
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P. O. Box 47250
Olympia, WA 98504-7250

Re: *Proposed Substitute Tariff Pages for Rabanco, Ltd, Certificate G-12, d/b/a Lynnwood Disposal*

Dear Mr. Danner:

We recently identified errors in the company's current Tariff No. 4 as filed. While we have been appropriately applying tariff rates pursuant to the Commission's last general rate Order No. 2 in TG-101157, when the affected pages were updated in August, 2010 for commodity credit purposes, apparently predecessor rate levels were inadvertently retained in the affected pages and, thus, while the commodity credit adjustments were correctly reflected, predecessor general rate levels were published rather than the correct current authorized rate levels, reflecting the rates approved by the Commission in Order No. 2 Docket TG-101157.

Revised tariff rates were approved at the August 12, 2010 Open Meeting, while revised single-family commodity credits were approved at the December 30, 2010 Open Meeting. Prior to those approvals, proposed replacement pages reflecting both the final tariff rates and the new commodity credit were filed with the Commission. The updated pages were subsequently not reflected in the company's published tariff.

Therefore, please see the attached corrected tariff pages reflecting the rates approved in TG-101157 and the subsequently approved commodity credits. The substitute pages reflect solid waste collection rates that were approved under the 2010 Order and the correct commodity credits subsequently approved under Docket TG-101224 for September, 2010 implementation.

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We apologize again for not identifying this error in a more timely fashion and request that the corrected pages be substituted for the current tariff pages as reflected in the attached 15th revised page, No. 21 and 16th revised page, No. 21a.

We view this as a ministerial filing to correct the erroneous publication created in December, 2010. Thus, we do not believe this should be characterized as a conventional circumstance where we are “changing rates.”

Because of this, we do not believe that WAC 480-70-266 or WAC 480-70-276 (rules on requisite 45-days notice and short notice LSN periods) are pertinent. We are now filing revised tariff pages, pursuant to WAC 480-70-286, merely to illustrate how the erroneous published rates would be actually reflected by correction of authorized rates resulting from the original Orders in TG-101157 and 101224.

Please contact us should you have further clarifying questions or concerns regarding this proposed substitute tariff filing.

Yours truly,

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cc: Dave Wiley