

March 21, 2014

Washington Utilities and Transportation Commission Chandler Plaza Building 1300 S. Evergreen Park Drive SW P.O. Box 47250 Olympia, WA. 98504-7250

Subject: Waste Management – South Sound and Waste Management of Seattle, divisions of Waste Management of Washington, Inc. (G-237); Tariff No. 23

Enclosed herein, you will find our new Tariff No.23 for the above-referenced company. This tariff replaces Waste Management – South Sound and Waste Management of Seattle Tariff No.22. In this new tariff, we are requesting adjustments to our rates attributed to increased disposal, maintenance, labor, fuel and other operating and administrative costs since our last general rate increase. This company received its last general rate increase on August 1, 2010 nearly four years ago. This new tariff, if approved by the commission, would increase Company revenue by approximately \$1,053,000 (10%) and collectively, residential and commercial rates by 13%. This new tariff is being filed with a proposed effective date of June 1, 2014.

Enclosed for your review are electronic copies (excel) of our workpapers related to the rate filing, including a legend for the tabs that clearly identifies where various financial analyses are located to facilitate the auditor's review.

Please note that our filing includes certain information that contains valuable commercial information and is therefore presented in accordance with the procedures established in WAC 480-07-160. Enclosed are electronic versions of confidential materials (excel), with the first page of the file, and each page that contains confidential information marked appropriately. A CD of our redacted workpapers and our confidential unredacted workpapers in Adobe Acrobat format which was too large to submit through the web site will be mailed to achieve compliance with WAC 480-07-140(6). In addition, a paper copy of the confidential and redacted workpapers will be submitted by mail as well.

A rate case checklist confirming compliance with the requirements of WAC 480-07-520 is included in the workpapers. In addition, enclosed is a "Petition for Rule Exemption", seeking the Commission's approval to file workpapers that vary from a strict interpretation of the general rate filing regulations. This request seeks an exemption for workpapers similar to that which has been approved by the Commission under exemptions granted to Waste Management of Washington, Inc. in its eight most recent general rate increase filings.

Sample customer notices are also enclosed. Customer notices will be mailed on or before May 1, 2014. In addition, a copy of this transmittal letter was mailed to King County on March 21, 2014.

This filing requests an effective date of June 1, thereby giving staff more than 70 days to review and audit the rates proposed. This time period is substantially greater than the minimum 45-day required

by statute, and hopefully will afford staff adequate time for review and investigation. We request that staff inform us as soon as possible as to whether the fling is "complete" and will not be rejected for failure to meet regulatory submittal requirements, and suggest a goal of April 1 for that determination, which would give the company time to correct any procedural deficiencies and still file for an effective date of June 1. This manner of filing early and being informed about completeness is not reflected in the Commission's tariff-filing regulations, but it has been discussed at recent workshops and therefore we are submitting this tariff request according to those discussions.

If you have any questions or need additional information, please contact me at:

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Respectfully,

Michael A. Weinstein

Senior Pricing Manager, Pacific Northwest Market Area

cc: Jason Rose
Adam Winston
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Clerk of the Board, King County