



WASHINGTON REFUSE & RECYCLING ASSOCIATION

January 7, 2011

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

Re: Docket No. A-042090 (Fuel Surcharge)

Dear Mr. Danner:

As we discussed, there appears to be some amount of uncertainty, if not confusion, regarding the above-referenced matter. Specifically:

- 1) Order #3 provides that the delegation of authority to the Executive Secretary will expire January 31, 2011. WRRA views that date as far too early to assist in resolving this issue in a manner which would be fair and reasonable for the Commission, our members and, of course, the ratepayers. There is a stakeholders' meeting currently set for January 20 at which we hope at least the outlines of a resolution will be discussed. There simply is not sufficient time between that meeting and the effective date of Order #3 for a workable solution to be effectuated or, for that matter, to exhaust all efforts to resolve the issue.
- 2) Of course, at the crux of this entire matter is the price of fuel. It is going up (again) and there is no guarantee what so ever that it will stabilize at any point in the foreseeable future. The delegation of authority regarding fuel surcharges has proven to be an effective method of dealing with this issue, saving the haulers time and expense, and avoiding substantial staff time by not having to deal with a general rate case when there is a single item involved. It

simply makes no sense for any party involved to complicate what is a relatively simple issue.

With the above in mind, WRRRA is of the belief that an extension of the January 31 date for at least three months would best serve the interests of the industry, the Commission and the ratepayers. We believe the Commission could and should do so upon its own motion.

Sincerely,

WASHINGTON REFUSE AND RECYCLING ASSOCIATION

A handwritten signature in cursive script that reads "Brad Lovaas". The signature is written in black ink and is positioned to the left of the printed name.

BRAD LOVAAS
Executive Director