

Agenda Date: December 10, 2003
Item Number: B1

Docket: TG-031972
Company Name: Solid Waste General

Staff: Cathie Anderson, Regulatory Analyst

Recommendation:

Direct the Secretary to issue an order that:

- (1) Authorizes an exemption from WAC 480-70-326(1), WAC 480-09-335, and WAC 480-07-520 (becomes effective 1-1-04) regarding the methods of submitting tariffs to the Commission; and
- (2) Allowing solid waste collection companies to electronically submit tariffs.

Discussion:

The Commission's Staff requests that the Commission, on its own motion, consider authorizing an exemption from WAC 480-70-326(1), WAC 480-09-335, and WAC 480-07-520.

WAC 480-70-326(1) requires solid waste collection companies to submit tariff filings to the Commission in person, by mail, or by telefacsimile. In contrast, WAC 480-80-031(4) allows electronic filing of tariffs by gas, electric, telecommunications and water companies.

WAC 480-09-335(1) requires Class A and B solid waste collection companies to file two copies of any proposed tariff. WAC 480-07-520, replaces WAC 480-09-335 effective January 1, 2004, and also requires Class A and B companies to file two copies when submitting tariffs to the Commission. This requirement is not necessary when companies file electronically.

A Staff team is involved in a project whose goal is to enable all Commission-regulated companies to electronically submit tariffs to the Commission, while concurrently drafting processes that will enable the tariff submissions to be managed electronically once they are received. The project is known as the E-filing Project.

During the past several months, select utility companies participated in the project. By working with a relatively small number of companies, Staff has been able to develop effective processes and policies for managing the e-filing program. Moving toward e-filing for all companies is a large undertaking. The e-filing goal is to move slowly and deliberately, taking time to ensure that the process ultimately adopted recognizes and incorporates any unique aspects of each industry's filing needs.

This project supports the Commission's commitment to the use of technology, particularly where doing so can result in benefits to our customers and to the Commission. During the pilot program several benefits have been identified, including:

- **Cost savings:** Both companies and the Commission have realized savings on staff processing time, postage, messenger services, and photocopying. Examples:

- Companies are not required to follow up with a “hard paper” copy of an e-filing submitted to the Commission, as they are required to do when a filing is submitted via fax.
- Companies may also submit back up documents and work papers electronically – often eliminating the submission of a large amount of paper documents.
- **Improved filing deadline flexibility:** Solid waste companies are required by law to submit rate filings to the Commission at least 45 days before the requested effective date of those filings. When submitting electronically, companies may have additional time to complete their filings before submitting them to the Commission because they will not have to allow for mailing or delivery time.
- **Increased communication between companies and the Commission regarding tariff filings.** Examples:
 - The company receives electronic notice that the Commission has received the e-filing. That notice also provides information regarding docket number, tentative docket date, staff assignments, and filing description.
 - Substitute sheets, if required, are submitted electronically. This facilitates negotiations between companies and Staff and makes it easier for a company to meet deadline for submitting such documents.
 - Following consideration at an open meeting, tariff sheets will be returned to the Company electronically. This ensures that the Company will receive the sheets soon after the open meeting and reduces Commission Staff time, photocopying, and postage costs.

- **Information sharing.** E-filings will interface with other Commission technologies, allowing the Commission to more efficiently share information with the public.

Examples:

- Providing copies of tariffs to answer consumer, legislative, or media inquiries.
- Providing copies of tariffs to companies.
- Maintaining accurate records of company rates and filings.
- New filings and activity are web-accessible via the Commission's Records Management System.

At present, only regulated utility companies have participated in the e-filing program. Staff believes, however, that it is now time to include transportation companies, beginning with solid waste collection companies so that they, too, may begin to enjoy the identified e-filing benefits. Several solid waste collection companies have volunteered to be included in the program. It is the project team's goal to work with those companies for a period of time to ensure that the draft processes work well for solid waste companies. Then, all solid waste companies will be encouraged to electronically submit their tariffs to the Commission.

Conclusion:

Staff recommends that the Commission, on its own motion,

- (1) Authorize an exemption from WAC 480-70-326(1), WAC 480-09-335, and WAC 480-07-520 (becomes effective 1-1-04) regarding the methods of submitting tariffs to the Commission; and
- (2) Allow solid waste collection companies to electronically submit tariffs.