

November 16, 2011

10631.0117

VIA EMAIL to WUTC RECORDS CENTER/
ORIGINAL VIA FIRST CLASS MAIL

David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
Attention: Records Center
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

Re: Filing by Rabanco Ltd. d/b/a Eastside Disposal and Allied Waste of Bellevue, G-12; Request for Exemption From WAC 480-07-505(3)(b) and WAC 480-07-520(4) General Rate Case Workpaper Requirements

Dear Mr. Danner:

This is to formally request, pursuant to WAC 480-07-110, an exemption from the above general rate case filing and workpaper requirements in order to allow Eastside Disposal, ("Petitioner"), to file a rate case seeking increase in its general rates due to the imminent increase in King County disposal fee filings for all affected customers. Filed today simultaneously are customer counts and rate spread analyses on the impact of the proposed rates.

Because Eastside Disposal has, pursuant to TG-100253, filed for and received adjustments to its general rates within the last 18 months, Petitioner believes that this request is fully consistent with the public interest and existing authority.

The Commission has recently indicated *In the Matter of the Delegation of Authority to the Secretary of the Commission Pursuant to RCW 80.01.030 and Fuel Surcharge Inquiry*, Docket A-042090 and Docket T-101661, (April, 2011), that it would allow affected haulers exemptions from general rate case rules for fuel surcharges with general rate filings not in excess of three years. Petitioner believes that the instant filing is fully consistent with the Commission's analogous statement on exemption from general rate filings and with the overall purpose of the rule on exemptions.

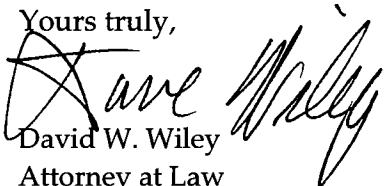
Finally, for consideration under the cited exemption rule, Petitioner asks that the above be treated as a Petition for Exemption or modification of WAC 480-07-505 and WAC 480-07-520 as concerns its rate filing to recoup increased disposal fees in King County effective January 1, 2012.

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Please contact the undersigned or Alex Brenner, of Eastside Disposal, with further questions on this request.

Yours truly,

A handwritten signature in black ink, appearing to read "David W. Wiley". The signature is written in a cursive style with a large, stylized initial "D".

David W. Wiley
Attorney at Law
(206) 233-2895
dwiley@williamskastner.com

DAV:lct

cc: Alex Brenner
John Lawler