

November 16, 2011

10631.0121

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 Sea-Tac Disposal and Allied Waste of Bellevue, G-12; Request for Exemption From WAC 480-07-505(3)(b) and WAC 480-07-520(4) Workpaper Requirements for This "Disposal Fee Only" Filing

Dear Mr. Danner:

Pursuant to WAC 480-07-110, Sea-Tac Disposal is formally requesting an exemption from WAC 480-07-505(3)(b) and, more specifically, WAC 480-07-520(4), to the extent that it is seeking to gain Commission approval and authorization for this form of filing of proposed tariffs which would add disposal fee increases in King County effective January 1, 2012 to its existing rates, without filing a general rate case. Sea-Tac Disposal believes this exemption request is consistent with the public interest and acknowledges its last general rate filing was pursuant to Docket No. TG-070749, effective July 1, 2007. During that time period, however, Sea-Tac would note that its regulated customer base has not experienced any significant growth and has, in fact, declined.

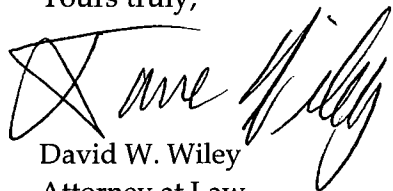
Sea-Tac Disposal therefore asks that the Commission here grant an exemption from WAC 480-07-520 and WAC 480-07-505(3)(b) to allow the enclosed filing to be treated as a "disposal fee only" filing and to otherwise meet the conditions for waivers/exemption within the spirit of the rule at WAC 480-07-110(2)(c), in avoiding an undue hardship on Sea-Tac Disposal by requiring the time and expense of a general rate filing in light of the above-mentioned circumstances which Sea-Tac believes supports relief from the need to file a general rate case with supporting workpapers under WAC 480-07-520(4).

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Please contact the undersigned or Alex Brenner, of Sea-Tac 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](mailto:dwiley@williamskastner.com)

DAV:lct

cc: Alex Brenner  
John Lawler