BEFORE
THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of: Waste Management of Washington, Inc.., d/b/a Waste Management of Skagit County	DOCKET TG- ________ PETITION FOR RULE EXEMPTION

I. INTRODUCTION

l. COMES NOW Waste Management of Washington, Inc. ("WMW") holder of Certificate of Public Convenience and Necessity No. G-237, and in accordance with WAC 480-07-370(l)(b) files this Petition for Rule Exemption ("Petition") respectfully requesting the Commission's approval to submit Work Papers that vary from a strict interpretation of the filing requirements under WAC 480-07-520(4) [1]

2. The Petition requests permission to file Work Papers that comport with the exemptions granted in WMW's last twelve general rate increase filings. [2]

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1 WAC 480-07-520 sets forth the minimum requirements for filing a general rate increase request by solid waste collection companies. Subsection (4) discusses the information and documents to be included in Work Papers.

2 See Orders 04/0rder 03 — Denying Petition For Rule Interpretation; Granting Exemption To Rule, WUTC v. Waste Management of Washington d/b/a Waste Management Sno-King, Docket Nos. TG-091933 & TG-091945 (Consolidated) (Mar.23, 2010); Order 01 — Granting Exemption From Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-101080 (July 15, 2010); Order 01 — Granting Exemption From Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-101706 (Nov. 24, 2010); Order 01 — Granting Exemption From Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-110792 (June 30, 2011); Order 01 — Granting Exemption From Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG- 120523 (May 10, 2012); Order 02_Granting Exemption From Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-121822 (Jan. 31, 2013); Order 01 — Granting Exemption From Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-130082 (Feb. 14, 2013); Order 01 — Granting Partial Exemption From Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG- 130938 (June 27, 2013); Order 01 — Granting Partial Exemption from

3. Contemporaneously with this Petition, WMW is today filing a general rate request for Waste Management of Washington, Inc. d/b/a Waste Management of Skagit County (WMSC). For its tariff request, WMW respectfully requests an exemption under WAC 480-07-110 to the extent the general rate filing rule stated in WAC 480- 07-520(4) would require the company to submit into the public record certain proprietary and confidential business records unrelated to the substantive audit of the rate filing itself. For the same reasons supporting the Commission's determinations to grant exemptions in the Prior Exemption Orders, approving this Petition would be consistent with the public interest, the purposes underlying the tariff filing regulation, and Ch. 81.77 RCW.

II. PARTIES

4. Petitioner's name and address are as follows: Waste Management of Washington, Inc. 720 Fourth Avenue, Suite 400 Kirkland, WA 98033-8136.

III. GROUNDS FOR RELIEF

5. WMW is the corporate subsidiary of Waste Management, Inc. that operates in Washington State. WMW is the holder of Certificate of Public Convenience and Necessity No. G-237, but throughout the State the company has ten different business units providing solid waste collection services. The business units currently perform regulated solid waste collection under eight different WUTC tariffs, one for each of the geographically specific collection entities. Disposal fees, labor rates, fuel prices, and other costs differ in each of the geographic territories. In addition, WMW owns two landfills, six transfer stations and eight recycling centers.

Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-140471 (Apr. 24, 2014); Order 01 — Granting Partial Exemption from Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-143115 (Sep. I l, 2014); Order 01 — Granting Partial Exemption from Rule, In the Matter of the Petition of Waste Management of Washington, Inc. d/b/a Waste Management of Spokane, Docket No. TG-143889 (Dec. I l, 2014); Order 01 — Granting Partial Exemption from Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-151382 (July 30, 2015); Order 01 — Granting Exemption from Rule, In the Matter of the Petition of Waste Management of Washington, Inc., Docket No. TG-201013 (February 25, 2021) (collectively, "Prior Exemption Orders").

6. In submitting its general rate request, for certain elements of WAC 480-07-520(4), WMW has limited some of the financial data included in its Work Papers to the business entity providing services under the tariff that WMW is seeking to amend and has not provided the analysis for WMW as a whole. This general rate filing for WMSC includes financial information that is the same in scope as the Work Papers approved by the Prior Exemption Orders. Thus, the Work Papers address the separate requirements of WAC 480-07-520(4) as follows:

7. WAC 480-07-520(4)(a) (detailed proforma income statement) - The required income statement is limited to WMSC, the business unit providing services under the tariff that WMW is seeking to amend.

8. WAC 480-07-520(4)(b) (revenue impact calculation for proposed tariff revisions) - The revenue impact calculation is limited to services provided by WMSC, the business unit providing services under the tariff that WMW is seeking to amend.

9. WAC 480-07-520(4)(c) (income statement listing all revenue and expense accounts by month) The required income statement is limited to WMSC, the business unit providing services under the tariff that WMW is seeking to amend.

10. WAC 480-07-520(4)(d) (detailed separation of all revenue and expenses between regulated nonregulated operations if nonregulated revenue exceeds ten percent of total company test period revenue) - The filing provides a detailed separation of all revenue and expenses between (1) WMSC, the business unit that provides services under the tariff that WMW is seeking to amend and (2) other business units within Waste Management with which WMSC has intra-company transactions or arrangements that, but for the fact that the business units are not separate corporations, would be affiliated interest transactions. The filing includes the 2024 Class A Annual Report and Affiliated Interest Report which reflects a detailed separation of all revenues and expenses for each of the other WMW business units performing collection operations, with expenses allocated proportionately on the basis of regulated and

unregulated revenues, and a combined statement of detailed revenues and expenses for all WMW's unregulated, non-collection operations added together.

11. WAC 480-07-520(4)(e) (detailed list of all nonregulated operations, including the rates charged for the services rendered) - The filing includes a list of all regulated and nonregulated operations within WMW, including the rates charged. No exemption is sought for this filing requirement, but due to the extensive number of municipal contracts under which WMW operates, information related to those unregulated operations will be provided upon Staff's request.

12. WAC 480-07-520(4)(f) (detailed price-out information) - The revenue reported is limited to services provided by WMSC, the business unit providing services under the tariff that WMW is seeking to amend.

13. WAC 480-07-520(4)(g) (consolidated balance sheet) - The required consolidated balance sheet includes Waste Management, Inc., and Waste Management of Washington, Inc. No exemption is sought for this filing requirement.

14. WAC 480-07-520(4)(h) (detailed depreciation schedule) - The assets for which a depreciation schedule is provided are limited to those utilized by WMSC, the business unit providing services under the tariff that WMW is seeking to amend.

15. WAC 480-07-520(4)(i) (computed investment) - The assets for which the investment is computed are limited to those utilized by WMSC, the business unit providing services under the tariff that WMW is seeking to amend.

16. WAC 480-07-520(4)(j) (information about every transaction with affiliated interests or subsidiaries) - Affiliated interest transactions under this requirement are limited to those between WMSC, the business unit providing service under the tariff that WMW is seeking to amend, on the one hand, and Waste Management, Inc., on the other, for administrative overhead services performed by the area and corporate offices. The filing includes an income

statement and balance sheet for Waste Management, Inc. No exemption is needed for this requirement.

IV. PETITION FOR EXEMPTION

17. WAC 480-07-110 provides that the Commission may grant an exemption from or modify the application of its rules in individual cases if consistent with the public interest and the purposes of the underlying regulation:

> The standard for consideration is the public interest standard. Factors the commission may consider include whether application of the rule would impose undue hardship on the requesting person, of a degree or a kind different from hardships imposed on other similarly situated persons, and whether the effect of applying the rule would be contrary to the underlying purposes of the rule.

18. In the Prior Exemption Orders, the Commission concluded that granting an exemption was in the public interest and met the standards for consideration of a rule exemption under WAC 480-07110(c) — and the same policy applies in this filing.

19. As the Commission observed in the Sno-King Exemption Order, Waste Management's corporate structure is unusual with respect to having so many organizationally distinct regulated and nonregulated lines of business within one corporation. The burdens imposed on WMW by the general rate filing requirements of WAC 480-07-520(4) are different in degree and kind than those imposed on other solid waste collection companies.

20. The purpose of WAC 480-07-520(4) is to ensure that all information necessary to determine whether existing or proposed rates are fair, just, reasonable, and sufficient is available to the Commission by requiring solid waste collection companies seeking to increase their rates to file Work Papers that account for a variety of data supporting the request, including information about commercial relationships with affiliated enterprises. The limited Work Papers filed for the consolidated tariff increase satisfies the purpose of the rule. Because the data for which this exemption is sought is not relevant to the tariff filing presented and because some of that analysis

is valuable and proprietary commercial information, granting this Petition is not inconsistent with the underlying purposes of the general rate filing rule stated in WAC 480-07-520(4).

21. In addition, to prepare some components of the Work Paper requirements for WMW as a whole would impose a significant hardship on the company because each business entity has its own general ledger, and the analysis would require manually consolidating data into one master ledger, a time-consuming and unproductive process without any commensurate benefit to the ratepayers.

22. Granting this Petition would allow WMW to file Work Papers that explain the services provided under WMSC's tariff, and that list all relevant data for any and every part of Waste Management as a whole that conducts intra-company transactions or arrangements affecting the services provided under the tariff. Allowing limitations to the financial information included in the Work Papers avoids filing immaterial and unnecessary Work Papers and relieves the administrative burden to both WMW and Commission. If this Petition is granted, then Staff will have the information needed to fully analyze the WMSC rate request, and WMW will have partial relief from the burdens of the literal application of the filing requirements in WAC 480-70-520(4).

V. CONCLUSION

23. For the reasons stated above, WMW respectfully requests that the Commission grant an exemption of WAC 480-07-520(4) to WMW for today's WMSC filing to limit the Work Papers required under WAC 480-07-520(4) in the manner stated above.

Respectfully submitted this 15th day of October 2025.

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