

January 10, 2012

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VIA EMAIL/ORIGINAL VIA FIRST CLASS MAIL

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

Re: Docket No. TG-111674, American Disposal Company, Inc., G-87; Request for Exemptions and Current Rate Suspension Status

Dear Mr. Danner:

Pursuant to WAC 480-07-110, American Disposal Company, Inc. ("American") is initially seeking an exemption from the rule at WAC 480-07-520(4), in order to allow the instant disposal fee only filing affecting rates for disposal in Pierce County without filing a general rate increase.

American last filed for a general rate increase effective March 1, 2011, under TG-110099. Here, the filing seeks to increase rates due solely to the disposal fee adjustment mandated by Pierce County. We thus note this request's consistency with recent Commission articulations of the intervals in which disposal fee filings and fuel surcharges will be granted without general rate reviews. See, i.e., *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).

Additionally, pursuant to Order No. 1, TG-111674, *In re: Washington Utilities and Transportation Commission v. American Disposal Company, Inc., G-87*, the Commission, in Section 28 of that Order, has suspended any further tariff changes except upon authorization of the Commission under RCW 81.04.130.


Thus, under WAC 480-07-110 and RCW 81.04.210, American respectfully requests that the Commission expressly authorize the filing approval and the change in rate levels should the enclosed rate filing for disposal fee changes be approved, in order to allow new rates to be implemented as of March 1, 2012. American is not asking for any other change in its tariffs during this period except for fuel surcharges as appropriate and understands that Section 28 of Order No. 1 in Docket No. TG-111674 remains in effect, subject to express Commission authorization of further changes thereto.

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Thank you for your attention to this matter. Please contact me should you have any further questions.

Yours truly,

A handwritten signature in black ink that reads "D Wiley". The signature is written in a cursive style with a large, looped initial "D".

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

DAV:lct

cc: Client