

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of:

Petition for Exemption by Murrey's Disposal Company, Inc., G-9, d/b/a Olympic Disposal

Case No. 170036

PETITION FOR EXEMPTION FROM PORTIONS OF WAC 480-07-520(4) and WAC 480-07-520(5)

1 COMES NOW Murrey's Disposal Company, Inc., G-9, d/b/a Olympic Disposal ("Murrey's Disposal," "the certificate holder" or "Petitioner"), PO Box 399, Puyallup, Washington, 98371, by and through its counsel, Williams Kastner & Gibbs PLLC and David W. Wiley, 601 Union Street, Suite 4100, Seattle, Washington, 98101, and hereby files this petition with the Washington Utilities and Transportation Commission ("the Commission"), pursuant to WAC 480-70-051, WAC 480-07-110 and WAC 480-07-370(1)(b), seeking an exemption from certain requirements of the general rate proceeding workpaper filing rule. The exemption is sought as applied to Murrey's Disposal as the "tariff-filing entity," in interpretation and application of the rule requirement in light of the revised Commission policy for stricter enforcement of the general rate case rule and in light of the Commission's decision in Order No. 4, TG-091933, *Washington Utilities and Transportation Commission v. Waste Management of Washington, Inc. d/b/a Waste Management of Sno-King* and Order No. 3, TG-091945 in re the *Petition of Waste Management, Inc. d/b/a Waste Management of Sno-King* (March, 2010), (the "Sno-King Order").¹

I. PRELIMINARY STATEMENT

2 This filing seeks various exemptions from portions of WAC 480-07-520(4) and from WAC 480-07-520(5) in asking that the Commission not require, as a part of the

¹ Like Waste Management of Washington, Inc. ("WMW"), Murrey's Disposal is comparable to WMW in operating as a single corporate entity in regulated service with separate operating divisions spanning multiple counties within differing tariff filing areas.

considerable workpapers being filed herewith, that under WAC 480-07-520, for example 4(a), a detailed pro forma income statement “separated among solid waste, single family residential recycling, multi-family and yard waste, with restating actual and pro forma adjustments, including all supporting calculations and documents for all adjustments” be required with respect to the certificate holder as a whole. This filing also occurs in the wake of the last general rate case of Murrey’s Disposal under Docket No. TG-160232 and which last general rate filing was only just effective on June 1, 2016, hence the underlying request not be required to resubmit various workpapers and documentations submitted in that filing. The range of adjustments required by the subparts of the rule are not all being provided for Murrey’s Disposal, Inc., the certificate holder as a whole, and, in some indicated subsections, neither for the tariff-filing entity because, as the staff is aware, Murrey’s Disposal just underwent an extensive audit in conjunction with its last general rate filing.

3 As noted, Petitioner is now filing separated income statements on behalf of the actual tariff proponent herein. Requiring the type of detail under subsection 4(a) and the revenue impact of the proposed tariff under subsection 4(b) for Murrey’s Disposal as a whole would work a substantial hardship on the Company at present and would also have no direct bearing on this general rate filing. Additionally, there are no revenue impacts posed to the Olympic Disposal operation by this current tariff filing of Murrey’s Disposal. The focal revenue impact of the proposed tariff revision in this general rate case will only directly affect the tariff filing subdivision of Murrey’s Disposal, which has a separate geographic service territory in Pierce County apart from Olympic Disposal’s operations in Jefferson and Clallam Counties.

4 Petitioner is also here seeking exemption from the application of selected latter portions
of the general rate case workpaper rule (WAC 480-07-520(4) (ii), (c), (d), (e), (f), (h), (i)
and (j) and (5)) to the extent that it is asking either that the rule be applied only to the
tariff-filing entity/subdivision, or in a couple instances, not at all. For example, the price
out information provided focuses on the proposed rates for the tariff-filing entity, only.
For WAC 480-07-520(4)(j)'s requirement, the Petitioner is not providing the requisite
affiliated interest information now because it previously provided all current affiliated
interest information in conjunction with Docket No. TG-160232. Finally, the Petitioner
is also not now providing, under WAC 480-07-520(5), the 2015 parent company (Waste
Connections, Inc.) annual report which was previously provided to Staff in the last
general rate case and is not yet available for calendar year 2016.

II. BASIS FOR REQUEST FOR EXEMPTION FROM WORKPAPER
REQUIREMENT ON DETAILED COMPANY-WIDE PRO FORMA INCOME
STATEMENT, REVENUE IMPACT AND INCOME STATEMENT BY
MONTHLY EXPENSE ACCOUNTS AND CALCULATION OF THE PROPOSED
TARIFF REVENUE IMPACT: WAC 480-07-520(4)(a) and 4(b)

5 The test period involved in this filing is January 1, 2015 through December 31, 2015.
6 Despite the inability to prepare a detailed pro forma income statement for separated
classes of service revenue impact and income statement by all accounts by month for all
of G-9 pursuant to subparts 4(a) and 4(b) of the rule, Murrey's Disposal *has* compiled a
detailed depreciation for the tariff-filing entity, (not the certificate holder as a whole)
under WAC 480-07-520(4)(h). It has prepared and is filing a lengthy schedule listing all
the tariff entity's assets and pertinent asset purchases, depreciation/salvage value
expenses, and test period information, etc., that will clearly identify all pertinent assets
for audit and allocation purposes at this time. It has also prepared a monthly income

statement listing all revenue and expenses by account by month for the tariff-filing entity under WAC 480-07-520(4)(c).

III. REQUEST FOR EXEMPTION FROM WAC 480-07-520(4)(ii)(d), (e), (f), (g), (i) and (j) and 480-07-520(5) TO THE EXTENT THOSE PROVISIONS WOULD APPLY ONLY TO THE TARIFF ENTITY/BUSINESS UNIT SUBJECT TO THE TARIFF AT ISSUE OR NOT BE APPLIED DUE TO RECENT GENERAL RATE CASE.

7 Finally, as noted above, Petitioner respectfully requests that the remainder of the general rate filing workpaper rule be narrowed in this instance to apply the indicated priceout detail, the separation of revenue between regulated and non-regulated operations and list of all non-regulated operations, including the rates charged for the services rendered and reconciliation by tariff item only to the tariff filing division, not to “certificate holder” as a whole. Additionally, we ask to provide the information at subsection (g) to information at the parent company level because those calculations are used in the tariff filing entity’s pro forma calculations submitted with this filing. For the depreciation schedule in subsection (h) and the computations of average investment, Petitioner also asks that these subsections to the rule apply only to the tariff filing entity as has been the practice with previous Petition for Exemption requests.


IV. PRAYER FOR RELIEF

8 WHEREFORE based on the foregoing outline and narrative of the issues raised by this Petition for Exemption from rule, Petitioner Murrey’s Disposal, Inc., asks that the Commission authorize the various exemptions of this filing as noted to WAC 480-07-520(4)(ii)(a) through (j), and WAC 480-07-520(5), in finding that it is in the public interest and fully consistent with the purposes of evaluating the instant general rate case increase to grant Murrey’s Disposal, Inc. exemptions from the workpaper requirements of

WAC 480-07-520(4) and (5), for the limited purpose of considering the proposed general rate case filing in this docket for the tariff-filing unit of Murrey's Disposal, Inc. and not those including Olympic Disposal and otherwise avoiding duplication of materials as just provided in the recent general rate case effective June 1, 2016.

Dated this 18th day of January, 2017.

Respectfully submitted,



DAVID W. WILEY
Attorney for Murrey's Disposal Company, Inc.
d/b/a Olympic Disposal

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2017, I caused to be served the original and three (3) copies of the foregoing document to the following address via first class mail, postage prepaid to:

Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

I certify I have also provided to the Washington Utilities and Transportation Commission's Secretary an official electronic file containing the foregoing document via the UTC web portal.



Lyndsay Taylor