

June 14, 2005

Ms. Brenda Harn  
Solid Waste Coordinator  
Chelan County Public Works Department  
316 Washington Street, Suite 402  
Wenatchee, Wa 98801

**RE: Chelan County Comprehensive Solid Waste Management Plan, TG-060706**

Dear Ms. Harn:

Per RCW 70.95.100 the Washington Utilities and Transportation Commission (commission) has completed its review of the preliminary draft of the Chelan County Comprehensive Solid Waste Management Plan (plan) dated April 2006.

Staff analysis of the Cost Assessment portion of the plan shows minimal impacts to regulated ratepayers in Chelan County. During the six-year planning period, disposal fees are anticipated to increase from \$24.61 per ton to \$27.84 per ton. By 2011, the last year of the planning period, a one-can weekly customer's monthly bill would increase about \$0.23. A one-yard commercial weekly pickup bill would increase about \$0.31.

The following are staff's comments for your consideration:

1. The plan often describes the area that certificated (regulated) solid waste companies operate in as "(franchise)" areas. We do not issue franchises; the commission issues Certificates of Public Convenience and Necessity.
2. The first paragraph on page 4-3 states that the county can request that the commission carry out the recycling provisions of the plan. Current commission practice is to include recycle costs in rates only after the local governing authority passes a minimum service level ordinance. That process must include public participation.
3. That same paragraph mentions "incentive rates." The glossary at the back of the plan defines incentive rates as those that "incorporate the cost of recycling into the cost of garbage collection, such that customers who recycle can then be charged a lower monthly fee as an incentive." If required by a service level ordinance, we do pass on the costs of

mandatory pay/voluntary participation recycle programs into rates. We do allow higher rates for non-recyclers than recyclers. We require carriers to breakout each category of service on their bills to customers. Incentive rates generally mean linear rates. The commission is charged with allowing rate structures consistent with the solid waste priorities set forth under RCW 70.95.010. We are also charged with the responsibility of setting rates that are fair, just reasonable and sufficient (RCW 81.04.130 and RCW 81.28.010.) We take that to mean rates should reflect the costs of providing the service.

4. On page 4-13 at Recommendation R2, it appears that the reference should be to the list of materials on page 4-10.
5. On page 4-24 the net average fee for our monthly residential recycling programs is in the range of \$3.00 to \$6.00.
6. Throughout Chapter 4, we remind you that except for multi-family recycling we do not regulate commercial recycling in any manner.
7. On page 5-12, our monthly average fee for voluntary yardwaste programs is in the range of \$6.00 to \$10.00.
8. Near the bottom of pages 6-6 and 6-8 regarding the discussion of service level ordinances and linear rates, refer to our comments per Items 2 and 3 above.
9. In Table 7.3 on page 7-6, the pit floor repair should read \$50,000.
10. In Table 10.1 on page 10-6, the 2005 detailed revenue and expense listings at the top of the Solid Waste Fund column do not equal the sub-totals at the bottom of the column. The reconciliation at the bottom also does not foot properly.

Questions or comments about the commission plan review process can be directed to Bob Colbo at (360) 664-1247 or by e-mail at [bcolbo@wutc.wa.gov](mailto:bcolbo@wutc.wa.gov).

Sincerely,

Carole Washburn  
Executive Secretary

cc: Sage Park, Department of Ecology, Eastern Regional Office  
Cullen Stephenson, Solid Waste and Financial Assistance Program Manager