



STATE OF WASHINGTON  
**UTILITIES AND TRANSPORTATION COMMISSION**

*621 Woodland Square Loop S.E. • Lacey, Washington 98503*

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July 11, 2022

**VIA US MAIL AND EMAIL**

Chris Jenness  
Certified Public Accountant  
7 Northeast Main, Box 268  
Wilbur, Washington 99185

RE: Robert J. Pellegrini, d/b/a Upper/Okanogan Valley Disposal G-21 Docket TG-220343

Dear Chris Jenness:

On June 27, 2022, Robert J. Pellegrini d/b/a Upper/Okanogan Valley Disposal (Company), filed with the Washington Utilities and Transportation Commission (Commission) a general rate case filing. This filing was docketed under Docket TG-220484.

The Company's filing does not comply with the Commission's rule, WAC 480-07-520. The company did not include with its filing the information required in WAC 480-07-520(4), regarding workpapers. The missing subsections of WAC 480-07-520(4) are;

- (a) a detailed pro forma income statement separated by customer class, with restating and pro forma adjustments, reflected in separate columns, including all supporting calculations and documentation for all adjustments,
- (b) A calculation of the total revenues the company is realizing at its present rates and the total revenues the company would realize at the requested rates,
- (c) An income statement listing all revenue and expense accounts by month or a supporting general ledger for the test period,
- (f) A detailed study that reconciles service pickups or passenger counts as applicable, to the test year revenue by tariff item or service. The computed revenue must reconcile within five percent of the test period revenue,
- (g) A consolidated balance sheet for the company with supporting documentation including, but not limited to, detailed cost of debt and a list of all real property and

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vehicle leases to which the company is a party,  
(h) A detailed calculation of net investment in plant and equipment and the net book value of used and useful assets at the end of the test period,

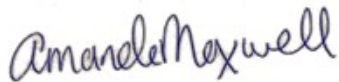
Lastly from WAC 480-07-520 (4) subsection (i) A detailed depreciation schedule listing all used and useful assets the regulated entity that operates under the tariff for which the company files the rate request held during the test period, including the date of purchase, the cost at purchase, the depreciable life, the salvage value, depreciation expense, and accumulated depreciation expense at the end of the test period.

Also, RCW 81-28-050 states for a solid waste collection company, a change may not be made except after forty-five days' notice to the commission and to the public. The tariff the company provided did not provide proper notice to the Commission and the public.

Under WAC 480-07-520, the Commission may reject a filing that fails to meet the minimum requirements, without prejudice to the Company's right to refile its request in conformance with the rule. Therefore, the Company's request filed on June 27, 2022, is rejected in its entirety.

If you have any questions regarding this letter, please contact Tiffany Van Meter at [tiffany.vanmeter@utc.wa.gov](mailto:tiffany.vanmeter@utc.wa.gov) or (360) 664-1246.

Sincerely,



Amanda Maxwell  
Executive Director and Secretary