Mason County Garbage Co., Inc. PO Box 787 Shelton, WA 98584

April 27, 2020

Mr. Mark L. Johnson Executive Director and Secretary Attn: Records Section Washington Utilities and Transportation Commission 1300 S Evergreen Park Dr SW Olympia, WA 98504-7250

Records Managemen State Of WASH 04/28/21 14:2 COMMISSIO Receive

RE: Withdrawal of TG-210261 and Resubmission as a Tariff Revision to Recover Incremental COVID 19 Costs - Mason County Garbage Co., Inc. G-88.

Dear Mr. Johnson:

At the request of Staff, we are withdrawing the accounting petition docket TG-210261 and replacing that filing with a tariff revision filing.

Overview

The Company proposes recovering \$49,681 of incremental COVID-19 costs, over a two-year period, beginning June 1, 2021. The two-year period is requested to minimize the monthly impact to customers. These costs include supplemental payments to all hourly employees, sanitary cleaning, and building and property expenses needed to maintain a safe work environment. The Company proposes the costs be recovered via an increase to each tariff rate, similar to a dump fee filing. This tariff revision affects approximately

The annual impact of this request is proposed as follows: Residential service \$12,200, 0.36%; commercial service \$4,600, 0.36%; roll-off service \$1,900, 0.36%; and residential recycling service \$5,500, 0.36%. There are approximately 13,800 residential; 1,000 commercial; 100 roll-off; and 14,000 residential recycling customers affected by this change.

Rate Calculation

The Company tracks COVID-19 expenses in dedicated general ledger accounts. The regulated portion of those accounts for the period of April 1, 2020 – March 31, 2021 is \$49,681, or 0.71% of regulated revenue for the same period. Half of that percentage, as to allow for a two-year recovery, is \$25,153 or 0.36% of revenue. Each tariff rate will be increased by 0.36%. The Company has provided work papers with this filing, including a Price Out, to support the calculation and prove appropriate recovery of incremental COVID-19 costs.

Tariff Pages

The Company is submitting a new set of "COVID-19 cost recovery" tariff pages, separate from existing tariff pages, in order to clearly state the expiration date of the COVID-19 recovery rates. If subsequent rate increases occur, such as a dump fee increase, the Company will update both sets of tariff pages for the approved increase. When the two-year recovery period ends, the Company will start billing the rates on the current "non-COVID-19 cost recovery" tariff pages.

Filing Considerations

Due to the required withdrawal of the accounting petition under docket TG-210261, and re-filing as a tariff revision at Staff's request, we respectfully ask that this filing be accepted under Less than Statutory Notice (LSN), per WAC 480-70-276. Should the Commission approve this filing under LSN, we request the new CPA go into effect on June 1, 2020.

Further, we request an exemption from the workpapers rules in WAC 480-07-520, and the 30 day customer notification in WAC 480-70-271(a), as this is a pass-through of known incremental COVID-19 costs, similar to a dump fee filing. We will notify customers of this increase on the first bill reflecting the change.

CONCLUSION

The company respectfully requests the Commission issue an accounting order authorizing the Company to defer and recover \$49,681 of COVID-19 incremental costs over a two-year period. The requested two year period begins June 1, 2021 and ends May 31, 2023.

If you have any questions regarding this filing, please contact me at (360) 695-4923, or via email at heatherg@wcnx.org.

Sincerely,

Heather Garland Pricing Manager