

December 21, 2011

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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: 2011/2012 Recycling Plans for Rabanco Ltd. d/b/a Allied Waste of Bellevue, SeaTac Disposal and Allied Waste of Lynnwood, Certificate G-12

Dear Mr. Danner:

Enclosed please find 2011/2012 Revenue Share Plans for the above companies which for this year, will be for a proposed period of seven months and certifications of the plans by King and Snohomish Counties. These plans are to accompany commodity credits filed under dockets TG-111991 for Rabanco Ltd (d/b/a Allied Waste of Bellevue), TG-111992 for Rabanco Ltd (d/b/a SeaTac Disposal) and TG-111993 for Rabanco Ltd (d/b/a Allied Waste of Lynnwood). In filing these plans, we note that the prior revenue share plans for the same two counties filed by Waste Management of Washington, Inc. under Docket No. TG-112162 et al. are still pending before the Commission and have just been recently recessed into a subsequent workshop for an Open Meeting. We thus expect that additional policy articulations by the Commission may be announced in those pending dockets which could have material impacts on the direction of these plans and reserve the right to address these with the Counties and to submit any subsequent amendments to the Commission for review and approval. However, we understand it is the Staff's current position that under RCW 81.77.185, in order to continue revenue share, we need to have filed and certified plans, hence our submissions today.

We also would note that *In re: WUTC v. Mason County Garbage Company, Inc. et al.*, TG-101542, Order No. 5, (May, 2010), the Commission announced principles that continue to evolve and to guide revenue share plan participants as they meet first at the local level to formulate and shape those plans based on this evolving area of law. Thus, we do not anticipate that either the seven month plan now submitted or prospective plans that will be submitted in summer, 2012 may necessarily include the same prior plan elements or designs while the Commission continues the current process of interpreting RCW 81.77.185 and legislative intent thereunder.

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As the counties' letters certify, however, the current 2012 plans are filed consistent with local solid waste service ordinances and with the submitting companies' understanding of various plan elements that are ultimately designed to increase recycling.

Please contact us if you have further questions on this matter.

Yours truly,

Alex Brenner

cc: John Lawler
Pete Keller
Dave Wiley