

My primary comments relate to the fact that once again there is no clear definition that describes industrial or commercial waste versus what is considered recyclable.

- does the generator determine if the material is recyclable?
- is it the local jurisdictions responsibility?
- is it the WUTC's responsibility

After reading the draft, it certainly does not appear that the WUTC has resolved this issue.

I think we all agree that the hauling of recyclable materials are clearly exempt from regulation by the WUTC. Where the disagreement lies is in the definition. There are those that would call anything recyclable. Consequently, the haulers and the Counties need direction from the WUTC as to where the jurisdiction lies to protect g-holders from potential losses to waste poachers.

The lack of any clear definition or direction from the WUTC actually diminishes the value of the g-permits. It also jeopardizes long standing relationships between the haulers and counties which have led to stable rate structures for the rate payers. My understanding of the primary role of the WUTC is to provide a stable rate environment. Failure to address this issue at this time will eventually destabilize rate structures.

I will try to be at the workshop on the 14th. See you there.

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