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Metropolitan Water Pollution Abatement Advisory Committee

King Street Center, 201 S Jackson St, MS: KSC-NR-6200, Seattle, WA 98104 206-477-4435

April 23, 2025

The Honorable Girmay Zahilay Chair, King County Council 516 Third Avenue, Room 1200 Seattle, WA 98104

Subject: Wastewater Treatment Division (WTD) 2026 Rate Recommendation

Dear Chair Zahilay:

The Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC) supports a sustainable regional wastewater treatment system. However, the rate forecast falls short of that goal. The steep projected rates are threatening to overwhelm not only our ability to adequately fund necessary local system improvements, but also our customers' ability to pay. Our region must develop a new approach to assuring a proper balance of regional versus local investments.

MWPAAC acknowledges the need for a sewer rate increase in 2026; however, we have not been given adequate time and information to responsibly understand the costs driving the rates for 2026 and beyond. The proposed forecast shows the current sewer rate of \$58 per month doubling in six years, reaching \$116 in 2031. On average, the charge makes up 65percent of the local sewer bill our customers pay. With affordability a crisis in our region and nationwide, the steep rate climb projected by WTD threatens to overwhelm our customers' ability to pay and will restrict local governments from adequately funding critical local system needs.

Several key points require additional discussion, all of which influence the rate path:

 Third-Party Oversight for Capital Program: Given the \$11 billion in proposed capital spending over the next 10 years, WTD should have third party oversight of mega projects. To properly understand and provide feedback to WTD on behalf of our ratepayers, the consultant should assess project conception, alternatives analysis, prioritization and delivery, budgeting, and financing. The Honorable Girmay Zahilay April 23, 2025 Page 2

- 2. **Rate Predictability for Multiple Years**: We strongly recommend committing to rates for a multi-year period, at a minimum for two years. This approach provides more discipline in rate-setting and forecasting and allows for better long-term planning and stability for WTD and for MWPAAC member agencies.
- 3. Long-Term Forecasting: It is imperative that we continue to refine long-term forecasts set forth in the Council's adopted motions 16410 and 16449. Early sharing of project alternatives and costs will allow MWPAAC to understand drivers and provide timely feedback. This effort must be ongoing to ensure that we are preparing for future system needs and revenue requirements.
- 4. Deeper Discussion on Capital Improvement Program Assumptions: MWPAAC wishes to better understand what contributes to the large cost buckets specifically project descriptions, alternatives, and cost projections per year. Having ample time to fully understand the projects and the planning behind them is essential for us to inform our leadership effectively.
- Revisit Regulatory Timelines: We urge you to encourage WTD to pursue appropriate timeline extensions for regulatory requirements in areas requiring significant investment, such as nutrient reduction and combined sewer overflows. This would allow for a more phased approach to implementing the required projects and provide rate relief to local agencies.
- 6. Policy Effects on Rate Growth: MWPAAC seeks clarity on how policies drive capital prioritization, particularly for projects that are not principally related to asset management or regulatory compliance. It has been over a decade since WTD conducted its formerly tri-annual comprehensive review. The Regional Wastewater Services Plan policies, as well as the financial policies, have direct and indirect effects on rates. Upcoming conversations on contract renewal will also daylight other concerns that require rate impact analysis, such as the Residential Customer Equivalent factor and a Capacity Charge that does not adequately account for the costs imposed by growth.

Our region is experiencing growing costs and strained financial resources, presenting extraordinary challenges to achieving lasting solutions and a system that is affordable for all ratepayers. While these challenges seem overwhelming, we have also seen a new engagement and collaboration growing to meet these obstacles. We must be prepared to make hard choices to prioritize the projects that must be done to maintain the integrity of

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the system. MWPAAC can support the proposed 2026 sewer rate; however, we urge the Council to work with the Executive and WTD to make meaningful progress on these issues summarized above before the next rate cycle begins.

Sincerely,

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John McClellan MWPAAC Chair

e-cc: The Honorable Shannon Braddock, County Executive, King County King County Councilmembers Regional Water Quality Committee members MWPAAC members John Taylor, Director, Department of Natural Resources and Parks (DNRP) Kamuron Gurol, Division Director, Wastewater Treatment Division, DNRP