

Law Offices of  
**RYAN SELLS UPTEGRAFT, INC. P.S.**

9657 Levin Road N.W., Suite 240, Silverdale, WA 98383  
Phone (360) 307-8860 • Fax (360) 307-8865 • Toll Free 1-800-481-8861  
E-mail: [jimsells@rsulaw.com](mailto:jimsells@rsulaw.com) Website: [rsulaw.com](http://rsulaw.com)

JAMES E. RYAN  
JAMES K. SELLS  
DARRELL D. UPTEGRAFT, JR.  
ANNE M. MONTGOMERY

CHERYL K. RIFE  
CHERRY L. DAVIS  
MARY SPAUN

August 26, 2009

GORDON L. WALGREN, *Of Counsel*

Mr. Dave Danner  
Executive Director and Secretary  
Washington Utilities and  
Transportation Commission  
1300 S Evergreen Park Dr. SW  
P. O. Box 47250  
Olympia, WA 98504-7250

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RECORDS MANAGEMENT  
2009 AUG 27 AM 9:04  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

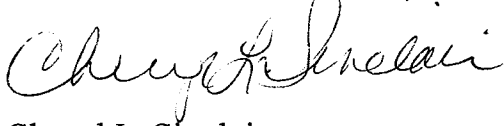
**Re: No. TG-091259**  
***Application of West Waste & Recycling, Inc.***

Dear Mr. Danner:

Enclosed you will find an original and 12 copies of Motion to Intervene of Washington Refuse and Recycling Association.

Very truly yours,

RYAN SELLS UPTEGRAFT, INC. P.S.



Cheryl L. Sinclair  
Legal Assistant to  
JAMES K. SELLS

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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION

In re Application TG-091259  
  
West Waste & Recycling, Inc.  
272 LaPush Road  
Forks, WA 98331

Case No.: TG-091259

PETITION TO INTERVENE  
OF WASHINGTON REFUSE  
AND RECYCLING ASSOCIATION

**COMES NOW** the Washington Refuse and Recycling Association (WRRRA), and respectfully petitions to intervene in the above matter pursuant to WAC 480-07-355, and in doing so alleges as follows:

- 1) Proposed intervenor's address is: 4160 6<sup>th</sup> Ave. SE, Suite 205, Lacey, Washington 98503.
- 2) WRRRA is a trade association representing over 30 solid waste haulers in Washington state. As such, it has taken part as a party or intervenor in virtually every WUTC hearing regarding solid waste since the inception of regulation of solid waste. Matters involving regulation of the solid waste industry are of interest to the members of WRRRA, who would not be parties in this action. The issue herein is of vital importance to the solid waste industry and therefore to WRRRA and its members.
- 3) A trade association such as WRRRA is included in the definition of "person" in WAC 480-07-340(1)(a). WAC 480-07-355(1)(a) provides that "any person" may file a Petition to Intervene.
- 4) WRRRA will not broaden the issues in this matter.

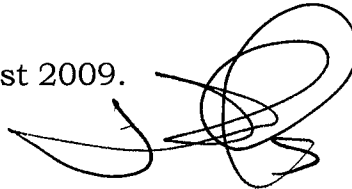
1           5)     WRRRA's position in this matter will be in support of Protestant  
2 Murrey's Disposal, Inc. d/b/a Olympic Disposal.

3           6)     Proposed intervenor's attorney is:

4                     James K. Sells  
5                     Ryan Sells Uptegraft, Inc. P.S.  
6                     9657 Levin Rd. NW, Suite 240  
7                     Silverdale, WA 98383  
8                     Phone: 360.307.8860  
9                     Fax:     360.307.8865  
10                    e-mail: jimsells@rsulaw.com

11           **WHEREFORE**, WRRRA prays that it be allowed to participate as an  
12 intervenor in this matter.

13           DATED this 26 day of August 2009.



14                     \_\_\_\_\_  
15                     JAMES K. SELLS  
16                     WSBA No. 6040  
17                     Ryan Sells Uptegraft, Inc. P.S.  
18                     9657 Levin Rd. NW, Suite 240  
19                     Silverdale, WA 98383  
20                     Attorneys for Washington Refuse  
21                     and Recycling Association

1 CERTIFICATE OF MAILING

2 I hereby declare that on the 26<sup>th</sup> day of August 2009, I caused to be  
3 deposited in the U. S. Mail, first class postage prepaid, a true copy of the  
4 foregoing PETITION TO INTERVENE OF WASHINGTON REFUSE AND  
5 RECYCLING ASSOCIATION addressed to:

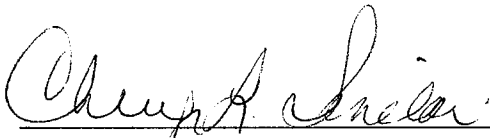
6 West Waste & Recycling, Inc.  
7 272 LaPush Road  
8 Forks, WA 98331

9 George E. Kargianis  
10 Law Offices of George Kargianis  
11 701 - 5<sup>th</sup> Ave., Suite 4760  
12 Seattle, WA 98104-7035

13 David W. Wiley  
14 Williams, Kastner & Gibbs, PLLC  
15 Two Union Square  
16 Suite 4100  
17 Seattle, WA 98111-3926

18 I swear under penalty of perjury of the laws of the State of Washington  
19 that the foregoing is true and correct.

20 DATED this 26<sup>th</sup> day of August 2009 at Silverdale, Kitsap County,  
21 Washington.

22   
23 Cheryl L. Sinclair