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BEFORE THE STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Complaint:

DTG ENTERPRISES, INC.

v.

Washington Utilities and Transportation  
Commission

DOCKET TG-240761

PETITION TO INTERVENE OF LAUTS  
INC. DBA LAUTENBACH INDUSTRIES

Lauts Inc. dba Lautenbach Industries (“Lauts”) 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: 13084 Ball Road Mount Vernon, WA 98273.

2) Lauts is a company regulated by the UTC in Washington state. Lauts has been providing collection of commercially generated recyclable materials for nearly 34 years. Lauts owns and operates three material recovery facilities and is currently constructing a fourth. Lautenbach recycling facilities rely heavily on the receipt of collected commodities provided to these recycling facilities by its own collection and transportation division. These facilities also receive materials delivered by generators as well as G-Certificated haulers.

As such, any matters involving the collection, and/or processing of commercially generated construction and demolition and land clearing debris and, commercially generated recyclable industrial materials (organic byproducts), is of great significance to Lauts’ operations.

1 Any adjudication with the potential to set policy for the industry should include  
2 representation from the regulated companies.

3 3) A business such as Lauts is included in the definition of "person" in WAC 480-07-  
4 340(1)(a). WAC 480-07-355(1)(a) provides that "any person" may file a Petition to Intervene.

5 4) Lauts' s participation as an intervenor in this action will not broaden the issues in  
6 the matter. At this time, Lauts does not intend to call any witnesses at hearing but reserves the  
7 right to do so should issues brought by the primary parties result in the presentation of  
8 witnesses by Lauts being helpful to the Commission. Lauts's involvement in this action is  
9 necessary to assure it's interests and those of their customers are properly presented and  
10 preserved.

11 5) Lauts's position in this action is expected to be in support of previously established  
12 precedents set by the UTC to allow Lauts to further the recycling goals of Washington State.

13 6) Proposed intervenor's attorney is:

14 Mark C. Lamb  
15 Carney Badley Spellman, P.S.  
16 701 5th Avenue, Ste.3600  
17 Seattle, WA 98104-7010  
18 Phone: 206-607-4101  
19 e-mail: mlamb@carneylaw.com

20 7) WHEREFORE, Lauts prays that it be allowed to participate as an intervenor in this  
21 matter.

22 DATED this 3rd day of February, 2025.

23 CARNEY BADLEY SPELLMAN, P.S.

24 By 

25 Mark C. Lamb, WSBA #30134  
26 Attorneys for Lauts Inc. dba Lautenbach Industries

**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the State of Washington that I am an employee at Carney Badley Spellman, P.S., over the age of 18 years, not a party to nor interested in the above-entitled action, and competent to be a witness herein. On the date stated below, I caused to be served a true and correct copy of the foregoing document on the below-listed attorney(s) of record by the method(s) noted:

☒ Email to the following:

Commission Staff  Lisa Gafken Assistant Attorney General PO Box 40128 Olympia WA 98504-0128	<a href="mailto:lisa.gafken@atg.wa.gov">lisa.gafken@atg.wa.gov</a>
Respondent & Counsel  DTG Enterprises, Inc. DTG Enterprises, Inc. PO Box 14203 Mill Creek, WA 98082 Respondent's Counsel  David Steele Perkins Coie, LLP 10885 NE Fourth Street STE 4900 Bellevue, WA 98004  David Perez Perkins Coie, LLP 1201 Third Ave STE 4900 Seattle WA 98101-3099  Jonathan Hawley Perkins Coie, LLP 1201 Third Ave STE 4900	<a href="mailto:info@dtgrecycle.com">info@dtgrecycle.com</a> <a href="mailto:dsteele@perkinscoie.com">dsteele@perkinscoie.com</a> <a href="mailto:dperez@perkinscoie.com">dperez@perkinscoie.com</a> <a href="mailto:jhawley@perkinscoie.com">jhawley@perkinscoie.com</a> <a href="mailto:solson@perkinscoie.com">solson@perkinscoie.com</a>

DATED this 3rd day of February, 2025.

s/ Lynn Caragol  
S. Lynn Caragol, Legal Assistant