Vandeberg & Johnson

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DARREL B. ADDINGTON
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HAROLD T. HARTINGER
JOANNE HENRY
MARK A. HOOD
W. ROGER JOHNSON
JONI R. KERR

JAMES A. KRUEGER, P.S.

JEROME F. MCCARTHY

1900 FIRST INTERSTATE PLAZA
1201 PACIFIC AVENUE
P.O. BOX 1315
TACOMA, WASHINGTON 98401-1315

(206) 383-3791 (TACOMA) (206) 838-8067 (SEATTLE) FACSIMILE: (206) 383-6377

May 4, 1992

JOHN L. NICHOLS
MARK R. PATTERSON
GARY W. ROSS
H. ANDREW SALLER, JR.
MICHAEL T. TURNBULL
MARY J. URBACK
ELVIN J. VANDEBERG
JAMES R. VERELLEN
G. PERRIN WALKER
JULIE R. WEIGAND-JOHNSON

OF COUNSEL ROBERT M. KANE, P.S.

Mr. Paul Curl, Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive S.W. P.O. Box 47250 Olympia, Washington 98504-7250

Re: Enoch Rowland d/b/a Kleenwell Biohazard and General Ecology Consultants - Rabanco Companies' Petition for Intervention -Docket No. TG-920304

Dear Mr. Curl:

Enclosed for filing is the original and three copies of Rabanco Companies' Petition for Intervention in the above-referenced matter. Also enclosed is the Certificate of Service by Mail which indicates that a copy of the Protest was mailed to the Applicant.

If there are any questions concerning the Petition, please contact the undersigned at 206-383-3791.

RICHARD A. FINNIGAN

RAF/las enclosures

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BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of Determining the Proper Carrier) DOCKET NO. TG-920304
Classification of:)
) PETITION FOR
ENOCH ROWLAND d/b/a KLEENWELL) INTERVENTION
BIOHAZARD AND GENERAL ECOLOGY)
CONSULTANTS)
	.)

comes now the RABANCO COMPANIES ("Rabanco"), by and through its attorney, Richard A. Finnigan, of the firm of Vandeberg & Johnson, attorneys at law, and petitions for intervention in the above entitled matter.

- I. This Petition is brought under the terms and conditions of WAC 480-09-430.
- II. Rabanco desires to appear and participate in the proceedings and will not by its appearance and participation broaden the issues beyond those stated in the cause.
- III. The address of Rabanco is 54 South Dawson, P.O. Box 2443, Seattle, Washington 98124.
- IV. The address of Vandeberg & Johnson is 1201 Pacific Avenue, Suite 1900, Tacoma, Washington 98402.
- V. Rabanco's interest and position in this proceeding is as an authorized provider of services, holding authority issued by the Washington Utilities and Transportation Commission, G-12, to serve

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as the solid waste collection company in portions of the territory described in that certificate.

Respectfully submitted this ____ day of May, 1992.

VANDEBERG & JOHNSON

RICHARD A. FINNIGAN, Attorney

for Protestant

Rabanco Companies

1900 First Interstate Plaza

1201 Pacific Avenue

Tacoma, WA 98402

(206) 383-3791

CERTIFICATE OF SERVICE

I hereby certify that I have this date served this Petition for Intervention upon applicant by mailing a copy to applicant Kleenwell Biohazard Waste and General Ecology Consultants, 17800 Des Moines Memorial Drive, Seattle, Washington 98148, and by mailing a copy to applicant's representative, James T. Johnson, Esq. Two Union Square, Suite 3000, 601 Union Street, Seattle, 98101-2324; and to Washington Utilities Transportation Commission, Chandler Plaza Building, 1300 South Evergreen Park Drive SW, P.O. Box 47250, Olympia, Washington 98504-7250; and to Mr. Steven W. Smith, Assistant Attorney General, Washington Utilities and Transportation Commission, Heritage Plaza Building, 1400 S. Evergreen Park Drive SW, Mail Stop: PY-11, 98504 each by first class mail, postage Olympia, Washington prepaid.

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