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2 BEFORE THE WASHINGTON STATE  
3 UTILITIES AND TRANSPORTATION COMMISSION  
4

5 In re Application of: ) DOCKET TG-230798  
6 PNW Composts Inc )  
7 ) PETITION TO INTERVENE OF  
8 ) WASHINGTON REFUSE  
9 ) AND RECYCLING  
10 ) ASSOCIATION  
11 )  
12 )  
13 )  
14 )

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

17 1) Proposed intervenor's address is: 4160 - 6th Ave. SE, Suite 205, Lacey, Washington  
18 98503.

19 2) WRRRA is a trade association representing the vast majority of regulated solid waste  
20 collection companies in Washington state. As such, it has taken part as a party, intervenor or  
21 interested party in virtually every WUTC hearing regarding solid waste since the inception of  
22 regulation of solid waste. Matters involving regulation of the solid waste industry are of interest  
23 to the members of WRRRA, who would not be parties in this action. The issues presented in this  
24 action are of substantial interest to the solid waste industry in Washington in general, and to all  
25 individual G-certificate holders who are members of WRRRA. Any adjudication with the potential  
26 to set policy for the industry should include representation from the regulated companies.

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.

1 4) WRRRA' s participation as an intervenor in this action will not broaden the issues in the  
2 matter. At this time, WRRRA does not intend to call any witnesses at hearing but reserves the  
3 right to do so should issues brought by the primary parties result in the presentation of witnesses  
4 by WRRRA being helpful to the Commission.

5 5) WRRRA's position in this action is expected to be in support of the Protestants.

6 6) Proposed intervenor's attorney is:

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8 Rod Whitaker, In-House Counsel  
9 WRRRA  
10 4160 6th Avenue SE, Ste.205  
11 Lacey, WA 98503  
12 Phone: 360-943-8859  
13 e-mail: [rod@wrra.org](mailto:rod@wrra.org)

14 7) WHEREFORE, WRRRA prays that it be allowed to participate as an intervenor in this  
15 matter.

16 Dated this 3<sup>rd</sup> day of November 2023

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19 Rod Whittaker  
20 WSBA No. 48336  
21 Attorney for Washington  
22 Refuse and Recycling  
23 Association  
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