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ANNE M. MONTGOMERY

CHERYL K. RIFE  
CHERRY L. DAVIS  
MARY SPAUN

October 28, 2008

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

**Re: No. TG-08157**  
**Application of Freedom 2000, LLC**

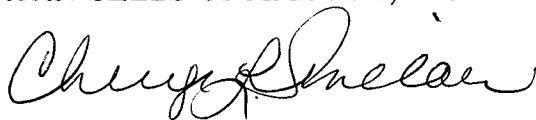
RECEIVED  
MARY SPAUN  
2008 OCT 29 AM 8:05  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

Dear Mr. Danner:

Enclosed you will find an original and 12 copies of Petition 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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BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In re Application of  
FREEDOM 2000, LLC

DOCKET NO. TG-08157  
PETITION TO INTERVENE

**COMES NOW** Petitioner Washington Refuse and Recycling Association (WRRRA), by and through its attorney JAMES K. SELLS, and petitions the Commission for Intervenor status in the above-referenced matter. In doing so, Petitioner alleges and prays as follows:

1) WRRRA is a trade association representing the majority of holders of WUTC Certificates of Public Convenience and Necessity for the collection and transportation of solid waste in the state of Washington. Proposed Intervenor's address is 4160 6<sup>th</sup> Ave. SE, Suite 205, Lacey, WA 98503.

2) WRRRA has taken part as a party or intervenor in virtually every WUTC hearing involving solid waste issues since the inception of the present regulatory system. Matters involving regulation of the solid waste and recycling industries are of vital importance 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 petition to intervene in an action such as this.

4) Proposed Intervenor does not intend to broaden the issues herein.

5) Proposed Intervenor's position in this matter is anticipated to be in support of the Protestant Points Recycling and Refuse.



1 CERTIFICATE OF MAILING

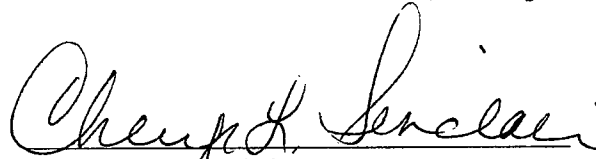
2 I hereby declare that on the 28<sup>th</sup> day of October 2008, I caused to be  
3 deposited in the U. S. Mail, first class postage prepaid, a true copy of the  
4 foregoing PETITION TO INTERVENE addressed to:

5 Freedom 2000, LLC  
6 575 Calder Dr.  
7 Pt. Roberts, WA 98281

8 Points Recycling and Refuse, LLC  
9 PMB 1542  
10 145 Tyee Drive  
11 Point Roberts, WA 98281

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

14 DATED this 28<sup>th</sup> day of October 2008 at Silverdale, Kitsap County,  
15 Washington.

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Cheryl L. Sinclair