

**BEFORE
THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In re Application of:

**ADE DUMPSTERS LLC
P.O. Box 111883
Tacoma, WA 98411**

DOCKET TG-200250

**PROTEST OF
WASTE MANAGEMENT OF
WASHINGTON, INC.**

1. Waste Management of Washington, Inc., d/b/a Waste Management – North Sound and Waste Management – Marysville and d/b/a Waste Management – South Sound and Waste Management of Seattle (“Waste Management”) holds Certificate No. G-237 to operate under RCW Title 81. ADE Dumpsters LLC (“ADE”) has applied for a certificate of public convenience and necessity to operate as a solid waste collection company in King, Pierce, and Thurston Counties. Pursuant to WAC 480-70-106(2), Waste Management respectfully protests ADE’s application in those areas where ADE’s proposed territory conflicts with Waste Management’s existing authority.
2. Waste Management provides solid waste collection services pursuant to Certificate No. G-237. As evidenced by that certificate, Waste Management currently holds authority in conflict with ADE’s applied-for authority, and Waste Management therefore has a direct interest in this proceeding.
3. Waste Management believes and therefore alleges that ADE is not qualified to receive a grant of a solid waste certificate of public convenience and necessity; is not fit, willing, and able

to properly perform the services proposed; and is unable to conform to the provisions of Chapter 81.77 RCW and the requirements, rules, and regulations of this Commission thereunder.

4. Waste Management is suitably and adequately equipped and otherwise qualified, ready, fit, willing, and able to provide—and does provide—service to customers in the portions of the applied-for territory already served by Waste Management to the satisfaction of the Commission and consistent with the Commission’s regulations. Waste Management therefore alleges that public convenience and necessity do not require the service proposed by ADE and that the proposed service is not in the public interest.
5. Waste Management requests that ADE be required to submit strict proof in support of its application and to produce competent witnesses at a hearing for cross-examination on all material and relevant facts bearing on the protested application. ADE has not demonstrated—and cannot—that it is fit, willing, or able to provide the applied-for services to the satisfaction of the Commission. ADE also has not and cannot demonstrate that Waste Management will not provide service to the satisfaction of the Commission.
6. If an oral hearing is held, Waste Management will appear and present evidence of its own operations and particular interests in the application. Waste Management estimates that it will call two to three witnesses at the hearing, and that the hearing time for the testimony of the witnesses will be approximately three hours.
7. Service on Waste Management in this docket should be made to:

Waste Management

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WHEREFORE, Waste Management respectfully requests the opportunity to participate in the hearing on this application, and that the Commission thereafter deny the application.

Respectfully submitted this 4th day of May, 2020.

Respectfully Submitted,
DAVIS WRIGHT TREMAINE LLP
Attorneys for Waste Management

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