

DAVIS WRIGHT TREMAINE

LAW OFFICES

2600 CENTURY SQUARE · 1501 FOURTH AVENUE · SEATTLE, WASHINGTON 98101-1688  
(206) 622-3150

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WILLIAM K. RASMUSSEN  
(206) 628-7760

October 4, 1994

STATE OF WASH.  
UTIL. & TRANSP  
COMMISSION

Mr. Steve McLellan, Secretary  
Washington Utilities and  
Transportation Commission  
1300 Evergreen Park Drive South  
P.O. Box 9022  
Olympia, WA 98504-9022

Re: The Disposal Group v. Waste Management Disposal  
Services of Oregon d/b/a Oregon Waste Systems,  
Washington Utilities and Transportation Commission  
Docket No. TG-941154

Dear Mr. McLellan:

Enclosed for filing is the original and four copies of respondent Waste Management's Memorandum in Opposition to the Petition to Intervene of the Washington Refuse & Recycling Association in the above-referenced matter. After filing the original, please return one of the copies, conformed, to our office in the enclosed envelope.

Thank you for your assistance in this matter.

Very truly yours,

DAVIS WRIGHT TREMAINE



William K. Rasmussen

Enclosure

cc: Parties of Record  
Mr. John Prusia, Hearing Officer  
Mr. William Jeffry  
Mr. Norman Wietting  
Mr. Douglas Coenen

25608\50\00024.LTR  
Seattle

FAX: (206) 628-7040

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PORTLAND, OREGON · RICHLAND, WASHINGTON · WASHINGTON, D.C.

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STATE OF WASH.  
UTIL. & TRANSP  
COMMISSION

BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION  
OF THE STATE OF WASHINGTON

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THE DISPOSAL GROUP, INC., dba  
VANCOUVER SANITARY SERVICE and  
TWIN CITY SANITARY SERVICE, a  
WASHINGTON CORPORATION (G-65);

Complainant,

vs.

WASTE MANAGEMENT DISPOSAL  
SERVICES OF OREGON, INC., dba  
OREGON WASTE SYSTEMS, a  
DELAWARE CORPORATION; and T&G  
TRUCKING & FREIGHT CO., an Oregon  
Corporation,

Respondents.

NO. TG-941154

WASTE MANAGEMENT'S  
MEMORANDUM IN  
OPPOSITION TO  
PETITION TO INTERVENE

Respondent, Waste Management Disposal Services of Oregon, Inc., d/b/a Oregon Waste Systems ("OWS") requests that the Petition to Intervene of the Washington Refuse and Recycling Association be denied.

Unlike the other parties to this proceeding, the Washington Refuse & Recycling Association has no direct interest in this matter. Its participation will unnecessarily complicate the proceeding, causing delay and additional costs for the parties

WASTE MANAGEMENT'S MEMORANDUM  
IN OPPOSITION TO PETITION TO INTERVENE - 1  
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Seattle

DAVIS WRIGHT TREMAINE  
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1 who have a direct interest in the action. No public interest  
2 will be served by allowing this intervention. The Association  
3 has not (and cannot) show that its interests will not be  
4 adequately represented by The Disposal Group, the complainant  
5 herein. Accordingly, the Petition to Intervene of the Washington  
6 Refuse & Recycling Association should be denied.

7 Dated this 4<sup>th</sup> day of October, 1994.

8 DAVIS WRIGHT TREMAINE  
9 Attorneys for Waste Management  
10 Disposal Services of Oregon, Inc.,  
11 d/b/a Oregon Waste Systems

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13 William K. Rasmussen  
14 WSBA #20029

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WASTE MANAGEMENT'S MEMORANDUM  
IN OPPOSITION TO PETITION TO INTERVENE - 2  
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Seattle

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding by mailing same, postage prepaid, to:

Steve McClellan, Secretary  
Washington Utilities and Transportation Commission  
1300 Evergreen Park Drive South  
P.O. Box. 9022  
Olympia, WA 98504-9022

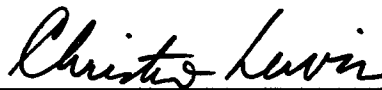
John Prusia, Hearing Officer  
Washington Utilities and Transportation Commission  
1300 Evergreen Park Drive South  
P.O. Box. 9022  
Olympia, WA 98504-9022

Cynthia A. Horenstein  
Horenstein & Duggan  
First Interstate Tower  
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P.O. Box 694  
Vancouver, WA 98666  
Attorney for The Disposal Group, Inc.

Jack R. Davis  
Davis, Baldwin & Haffner  
1200 Fifth Avenue, #1900,  
Seattle, WA 98101  
Attorney for T&G Trucking & Freight Co.

James K. Sells  
McCluskey, Sells, Ryan, Uptegraft & Decker  
510 Washington Ave, Suite 300,  
Bremerton, WA 98337  
Attorney for Washington Refuse & Recycling Association

Dated this 4th day of October, 1994 at Seattle, Washington.

  
Christine Lewis

WASTE MANAGEMENT'S MEMORANDUM  
IN OPPOSITION TO PETITION TO INTERVENE - 3  
25608\50\00023.PLD  
Seattle

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