



WASHINGTON REFUSE & RECYCLING ASSOCIATION

July 20, 2015

Mr. Steve King  
Executive Director & Secretary  
Washington Utilities and  
Transportation Commission  
PO Box 47250  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250

**Re: Docket A-130355  
Part III**

Dear Mr. King:

Thank you for the opportunity to comment on this stage of the comprehensive review and revision of the Commission's procedural rules. WRRA has actively participated in this effort and will continue to do so by submitting comments and taking part in workshops and hearings as they are scheduled. Please also be aware that comments offered by WRRA are on behalf of WRRA, and additional comments from individual members on their own behalf are anticipated.

Part III, which addresses adjudicative proceedings, is of substantial interest to the industry. Although, as a general rule, everyone involved hopes to avoid the necessity of an adjudicative proceeding, the reality is that in some instances a hearing simply cannot be avoided. In such situations, all parties need to proceed pursuant to clear, fair and contemporary rules which accurately reflect not only the then current state of the law but the ever-advancing world of technology.

At this point in the rule making, we are pleased to see the effort expended in modernizing and "streamlining" the rules. Part III admittedly may not be as "exciting" as perhaps other parts, but it is equally important. It is obvious that a great deal of work has gone into this draft, and we are truly appreciative of that effort and expertise. With perhaps a few minor "tweaks" that undoubtedly will arise as the process continues, we see this first draft of Part III as being very close to being a final draft. However, we will await review of other

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comments and a workshop, if appropriate, before reaching any final conclusions.

Again, Judge Kopta and staff are to be commended for their hard work on this Part. We look forward to not only finalization of Part III language but to completion of this necessary integration and revision of all the procedural rules.

Very truly yours,

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JAMES K. SELLS  
General Counsel

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