25

26

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In re Joint Applications GA-79141, GA-79142, and GA-79159 of Rabanco, Ltd.

ORDER TG-030434 ORDER TG-030590

PETITION TO AMEND ORDERS TG-030433, TG-030434, AND TG-030590

## I. IDENTITY AND ADDRESS OF MOVING PARTY

King County, a political subdivision of the State of Washington, is the petitioning party. The mailing address for King County's Department of Natural Resources and Parks, the responsible county department, is 201 South Jackson Street, Seattle, Washington, 98104.

## II. RELEVANT STATUTES AND RULES

This petition is based on the authority set forth in RCW 80.01.040 and WAC 480-07-875.

## III. REQUEST FOR RELIEF

King County petitions for an order amending Orders TG-030433, TG-030434, and TG-030590 such that all certificates of necessity and convenience transferred to Rabanco, Ltd. by these orders and consolidated as Certificate G-12 instead are transferred to Rabanco, Ltd. as

PETITION TO AMEND ORDERS TG-030433, TG-030434, AND TG-030590 - 1

FOSTER PEPPER & SHEFELMAN PLLC 1111 THIRD AVENUE, SUITE 3400 SEATTLE, WASHINGTON 98101-3299 ◆ 206-447-4400 separate certificates of necessity and convenience for each county in which Rabanco, Ltd. is authorized to collect waste under Certificate G-12 (August 22, 2003).

This amendment would create six certificates of convenience and necessity for Rabanco, Ltd. in the currently authorized territory in each of King, Snohomish, Klickitat, Skamania, Yakima, and Kitsap Counties (as well as Pierce County, if Rabanco has operating authority in Pierce County) included in Certificate G-12 (August 22, 2003). This petition is based upon the attached declaration of Justin D. Haag and the attached memorandum of law.

DATED this 29th day of September, 2004.

NORM MALENG, PROSECUTING ATTORNEY

FOSTER PEPPER & SHEFELMAN PLLC

P. Stephen DiJulio, WSBA No. 7139 Jeremy R. Larson, WSBA No. 22125

Attorneys for Petitioners King County

PETITION TO AMEND ORDERS TG-030433, TG-030434, AND TG-030590 - 2

FOSTER PEPPER & SHEFELMAN PLLC 1111 THIRD AVENUE, SUITE 3400 SEATTLE, WASHINGTON 98101-3299 ◆ 206-447-4400