BEFORE THE WASHINGTON STATE

In re Application of:) DOCKET TG-240584)
DTG Enterprises Inc) PETITION TO INTERVENE OF) WASHINGTON REFUSE) AND RECYCLING) ASSOCIATION)
)

The Washington Refuse and Recycling Association (WRRA) respectfully petitions to intervene in the above matter pursuant to WAC 480-07-355, and in doing so alleges as follows:

- 1) Proposed intervenor's address is: 4160 6th Ave. SE, Suite 205, Lacey, Washington 98503.
- 2) WRRA is a trade association representing the vast majority of regulated solid waste collection companies in Washington state. As such, it has taken part as a party, intervenor or interested party in virtually every Utilities and Transportation Commission hearing regarding solid waste since the inception of solid waste regulation. Matters involving regulation of the solid waste industry are of interest to the members of WRRA, who would not be parties in this action. The issues presented in this action are of substantial interest to the solid waste industry in Washington in general, and to all individual G-certificate holders who are members of WRRA. Any adjudication with the potential to set policy for the industry should include representation from the regulated companies.
- 3) A trade association such as WRRA 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 file a Petition to Intervene.

1	4) WRRA's participation as an intervenor in this action will not broaden the issues in the
2	matter. At this time, WRRA does not intend to call any witnesses at hearing but reserves the
3	right to do so should issues brought by the primary parties result in the presentation of witnesses
4	by WRRA being helpful to the Commission.
5	5) WRRA's position in this action is expected to be in support of the Protestants.
6	6) Proposed intervenor's attorney is:
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Rod Whitaker, In-House Counsel WRRA 4160 6th Avenue SE, Ste.205 Lacey, WA 98503 Phone: 360-943-8859 e-mail: rod@wrra.org 7) WHEREFORE, WRRA prays that it be allowed to participate as an intervenor in this matter. Dated this 25th Day of September, 2024. Rod Whittaker WSBA No. 48336 Attorney for Washington Refuse and Recycling Association
26	