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## BEFORE THE WASHINGTON STATE

## UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of:	) DOCKET TG-220215
FORMAL COMPLAINT OF BASIN DISPOSAL, INC. AGAINST JAMMIE'S ENVIRONMENTAL, INC	) ) PETITION TO INTERVENE OF ) WASHINGTON REFUSE ) AND RECYCLING ) ASSOCIATION )
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**COMES NOW** the Washington Refuse and Recycling Association (WRRA) and 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 significant WUTC hearing regarding solid waste since the inception of regulation of solid waste. 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. The Company has raised issues that impact Commission regulated solid waste collection companies. 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.
- 4) WRRA's participation as an intervenor in this action will not broaden the issues in the matter. At this time, WRRA does not intend to call any witnesses at hearing but reserves the right to do so should issues brought by the primary parties result in the presentation of witnesses by WRRA being helpful to the Commission.
  - 5) WRRA's position in this action is expected to be in support of the complainant.
- 6) WRRA has filed a separate petition to intervene in a related proceeding, Docket TG-220243 In re Application of: Jammie's Environmental, Inc.
  - 7) Proposed intervenor's attorney is:

Rod Whitaker, Attorney at Law 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 April 2022

Rod Whittaker WSBA No. 48336 Attorney for Washington Refuse and Recycling

Association