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6 BEFORE THE WASHINGTON STATE
7 UTILITIES AND TRANSPORTATION COMMISSION

8 In re Application TG-150771

Docket No. TG-150771

9 Topsoils, Inc. d/b/a United Recycling
10 & Container

PETITION TO INTERVENE
OF WASHINGTON REFUSE
AND RECYCLING
ASSOCIATION

11
12 **COMES NOW** the Washington Refuse and Recycling Association (WRRRA)
13 and respectfully petitions to intervene in the above matter pursuant to WAC
14 480-07-355, and in doing so alleges as follows:

15 1) Proposed intervenor's address is: 4160 - 6th Ave. SE, Suite 205,
Lacey, Washington 98503.

16 2) WRRRA is a trade association representing the vast majority of solid
17 waste haulers in Washington state. As such, it has taken part as a party,
18 intervenor or interested party in virtually every WUTC hearing regarding solid
19 waste since the inception of regulation of solid waste. Matters involving
20 regulation of the solid waste industry are of interest to the members of WRRRA,
21 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 WRRRA.

22 3) A trade association such as WRRRA is included in the definition of
23 "person" in WAC 480-07-340(1)(a). WAC 480-07-355(1)(a) provides that "any
24 person" may file a Petition to Intervene.

25 4) WRRRA's participation as an intervenor in this action will not broaden
26 the issues in the matter. WRRRA does not intend to call any witnesses at hearing,

1 but reserves the right to do so should issues brought by the primary parties
2 result in the presentation of witnesses by WRRRA being helpful to the
3 Commission.

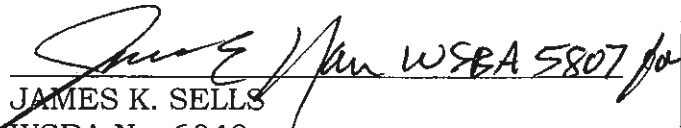
4 5) WRRRA's position in this action is expected to be in support of the
5 Protestants.

6 6) Proposed intervenor's attorney is:

7 James K. Sells
8 Attorney at Law
9 PMB 22
3110 Judson Street
Gig Harbor, WA 98335
Phone: 360.981.0168
e-mail: jamessells@comcast.net

10 **WHEREFORE**, WRRRA prays that it be allowed to participate as an
11 intervenor in this matter.

12 DATED this 22nd day of July, 2015.


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15 JAMES K. SELLS
16 WSBA No. 6040
17 Attorney for Washington Refuse and
18 Recycling Association
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding, by the method as indicated below, pursuant to WAC 480-07-150.

Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW PO Box 47250 Olympia, WA 98504-7250 360.664.1160 records@utc.wa.gov	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
Topsoils, Inc. d/b/a United Recycling & Container 18827 Yew Way Snohomish, WA 98296	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Email
David W. Wiley Williams, Kastner & Gibbs PLLC Two Union Square 601 Union Street, Suite 4100 Seattle, WA 98101 206.233.2895 dwiley@williamskastner.com	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
Tina Leipski Office of the Attorney General 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0218 360.664.1187 TLeipski@utc.wa.gov	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email

DATED at Silverdale, Washington, this 23rd day of July, 2015.


Cheryl L. Sinclair