

1
2 BEFORE THE WASHINGTON STATE
3 UTILITIES AND TRANSPORTATION COMMISSION
4

5 In re Application of:) DOCKET TG-240583
6 DTG Enterprises Inc)
7) PETITION TO INTERVENE OF
8) WASHINGTON REFUSE
9) AND RECYCLING
10) ASSOCIATION
11)
12)
13)
14)

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

17 1) Proposed intervenor's address is: 4160 - 6th Ave. SE, Suite 205, Lacey, Washington
18 98503.

19 2) WRRRA is a trade association representing the vast majority of regulated solid waste
20 collection companies in Washington state. As such, it has taken part as a party, intervenor or
21 interested party in virtually every Utilities and Transportation Commission hearing regarding
22 solid waste since the inception of solid waste regulation. Matters involving regulation of the
23 solid waste industry are of interest to the members of WRRRA, who would not be parties in this
24 action. The issues presented in this action are of substantial interest to the solid waste industry in
25 Washington in general, and to all individual G-certificate holders who are members of WRRRA.
26 Any adjudication with the potential to set policy for the industry should include representation
from the regulated companies.

3) A trade association such as WRRRA 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) WRRRA' s participation as an intervenor in this action will not broaden the issues in the
2 matter. At this time, WRRRA 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 WRRRA being helpful to the Commission.

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

6 6) Proposed intervenor's attorney is:

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8 Rod Whitaker, In-House Counsel
9 WRRRA
10 4160 6th Avenue SE, Ste.205
11 Lacey, WA 98503
12 Phone: 360-943-8859
13 e-mail: rod@wrra.org

14 7) WHEREFORE, WRRRA prays that it be allowed to participate as an intervenor in this
15 matter.

16 Dated this 25th Day of September, 2024.

17 

18 _____
19 Rod Whittaker
20 WSBA No. 48336
21 Attorney for Washington
22 Refuse and Recycling
23 Association