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6 BEFORE THE WASHINGTON STATE  
7 UTILITIES AND TRANSPORTATION COMMISSION

8 WASHINGTON UTILITIES AND  
9 TRANSPORTATION COMMISSION

10 Complainant,

11 vs.

12 ECOMED SERVICES, LLC.

13 Respondents.

Docket No. TG-152373

PETITION TO INTERVENE OF  
WASHINGTON REFUSE  
AND RECYCLING  
ASSOCIATION

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

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

19 2) WRRRA is a trade association representing the vast majority of solid  
20 waste haulers in Washington state. As such, it has taken part as a party,  
21 intervenor or interested party in virtually every WUTC hearing regarding solid  
22 waste since the inception of regulation of solid waste. Matters involving  
23 regulation of the solid waste industry are of interest to the members of WRRRA,  
24 who would not be parties in this action. The issues presented in this action are  
25 of substantial interest to the solid waste industry in Washington in general, and  
26 to all individual G-certificate holders who are members of WRRRA.

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

4           4)     WRRRA's participation as an intervenor in this action will not broaden  
5 the issues in the matter. WRRRA does not intend to call any witnesses at hearing,  
6 but reserves the right to do so should issues brought by the primary parties  
7 result in the presentation of witnesses by WRRRA being helpful to the  
8 Commission;

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


11           6)     Proposed intervenor's attorney are:

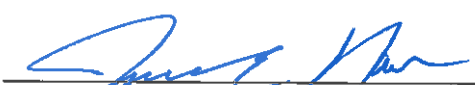
12                   James K. Sells, Attorney at Law  
13                   PMB 22  
14                   3110 Judson Street  
15                   Gig Harbor, WA 98335  
16                   Phone: 360.981.0168  
17                   e-mail: [jamessells@comcast.net](mailto:jamessells@comcast.net)

18                   Rod Whitaker, Attorney at Law  
19                   WRRRA  
20                   4160 6<sup>th</sup> Avenue SE, Ste.205  
21                   Lacey, WA 98503  
22                   Phone: 360-943-8859  
23                   e-mail: [rod@wrrra.org](mailto:rod@wrrra.org)

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

26                   DATED this 16<sup>th</sup> day of June, 2016.

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28 \_\_\_\_\_  
29 James E. Ryan for (WSBA No 5807)  
30 For JAMES K. SELLS  
31 WSBA No. 6040  
32 Attorney for Washington Refuse and  
33 Recycling Association

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35 \_\_\_\_\_  
36 James E. Ryan (WSBA No 5807)  
37 For ROD WHITTAKER  
38 WSBA No. 48336  
39 Attorney for Washington Refuse and  
40 Recycling Association

**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 <a href="mailto:records@utc.wa.gov">records@utc.wa.gov</a>	<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
Alex Squalli President/Presiding Manager 1400 Hubbell Pl., Ste. 1206 Seattle, WA 98101 206-427-6641 <a href="mailto:asqualli@ecomedservices.com">asqualli@ecomedservices.com</a>	<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
Julian Beattie Office of the Attorney General 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0218 360.664.1225 <a href="mailto:jbeattie@utc.wa.gov">jbeattie@utc.wa.gov</a>	<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 16<sup>th</sup> day of June, 2016.



Terre M. Skelly