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BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

9 In the Matter of the Petition of
10 STERICYCLE OF WASHINGTON, INC.,

Docket TG-110553

11 For an Order Suspending Tariff Filing and
12 Initiating an Adjudicatory Proceeding
13 concerning the Abandonment of Authority
14 Under G-237 and Proposed Biomedical
15 Waste Collection and Transportation
16 Services of Waste Management of
17 Washington, Inc. dba WM Healthcare
18 Solutions (G-237)

PETITION TO INTERVENE
BY WASHINGTON
REFUSE & RECYCLING
ASSOCIATION

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

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

22 2) WRRRA is a trade association representing over 30 solid waste
23 haulers in Washington state. As such, it has taken part as a party or
24 intervenor in virtually every WUTC hearing regarding solid waste since the
25 inception of regulation of solid waste. Matters involving regulation of the solid
26 waste industry are of interest to the members of WRRRA, who would not be
parties in this action. The issues presented in this action are of substantial

1 interest to the solid waste industry in Washington in general, and to all
2 individual G-certificate holders who are members of WRRRA.

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

6 4) WRRRA does not intend to broaden the issues in this matter.

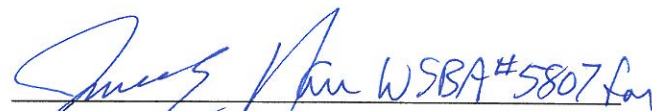
7 5) WRRRA's position in this matter is in general support of that of
8 Waste Management of Washington, Inc., as expressed in its Motion to Dismiss
9 Stericycle's Complaint and Petition on file herein.

10 6) Proposed intervenor's attorney is:

11 James K. Sells
12 PMB 22, 3110 Judson St.
13 Gig Harbor, WA 98335
14 phone: 360.981.0168
15 e-mail: jamesells@comcast.net

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

18 DATED this 25th day of April 2011.

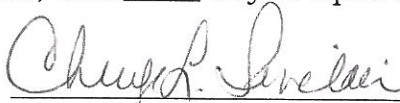
19 
20 JAMES K. SELLS
21 WSBA No. 6040
22 Attorney for Washington Refuse &
23 Recycling Association

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served this document upon all parties
3 of record in this proceeding, by the method as indicated below, pursuant to WAC
4 480-07-150.

5 Stephen B. Johnson 6 Donald B. Scaramastra 7 Garvey Schubert Barer 8 1191 Second Ave., Suite 1800 9 Seattle, WA 98101 10 (206) 464-3939 11 sjohnson@gsblaw.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
12 Washington Utilities and 13 Transportation Commission 14 1300 S. Evergreen Park Dr. SW 15 PO Box 47250 16 Olympia, WA 98504-7250 17 360.664.1160 18 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
19 Polly L. McNeill 20 Summit Law Group 21 315 - 5th Avenue S. 22 Seattle, Washington 98104 23 pollym@summitlaw.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

24 DATED at Silverdale, Washington, this 25th day of April 2011.

25 
26 Cheryl L. Sinclair