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7 BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

8 WASHINGTON UTILITIES AND
9 TRANSPORTATION COMMISSION

Docket No. TG-131794

10 Complainant,

11 vs.

12 WASTE CONTROL, INC. (G-101),

13 Respondents.

PETITION TO INTERVENE
OF WASHINGTON REFUSE
AND RECYCLING
ASSOCIATION

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

18 1) Proposed intervenor's address is: 4160 - 6th Ave. SE, Suite 205,
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
of substantial interest to the solid waste industry in Washington in general, and
25 to all individual G-certificate holders who are members of WRRRA.
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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;

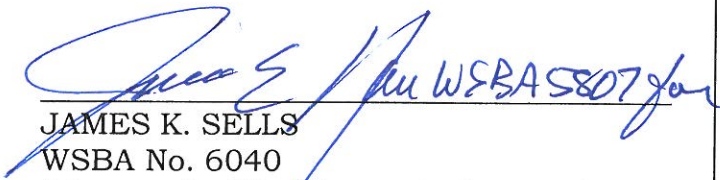
9 5) WRRRA's position in this action is expected to be in support of the
10 Respondent.

11 6) Proposed intervenor's attorney is:

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

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

21 DATED this 7th day of January 2014.


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JAMES K. SELLS
WSBA No. 6040
Attorney for Washington Refuse and
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 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
David W. Wiley Williams, Kastner & Gibbs PLLC Two Union Square 601 Union Street, Suite 4100 Seattle, WA 98101 206.233.2895 <u>dwiley@williamskastner.com</u>	<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
Waste Control, Inc. PO Box 148 Kelso, WA 98626	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Email
Steven W. Smith Office of the Attorney General 1400 S. Evergreen Park Dr. SW PO Box 40128 Olympia, WA 98504-0218 360.664.1225 <u>ssmith@utc.wa.gov</u>	<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 7th day of January 2014.


Cheryl L. Sinclair